

Privacy Policy

1. Introduction

This Privacy Policy outlines how HFHS ("we," "our," or "us") collects, uses, shares, and protects information provided by suppliers who register through our SaaS-based, white-labeled STARS (Supplier Tracking and Reporting System) portal ("Portal"). Although hosted and operated by the licensed technology service provider VIVA USA INC ("Service Provider"), the STARS Portal is owned and controlled by HFHS.

2. Applicability

This policy is applicable to all U.S.-based and international supplier users, but emphasizes compliance with relevant U.S. federal and state privacy laws, including:

- California Consumer Privacy Act (CCPA) & California Privacy Rights Act (CPRA)
- Virginia Consumer Data Protection Act (VCDPA)
- Colorado Privacy Act (CPA)
- Connecticut Data Privacy Act (CTDPA)
- Utah Consumer Privacy Act (UCPA)
- Texas Data Privacy and Security Act (TDPSA)
- Oregon Consumer Privacy Act (OCPA)
- Montana Consumer Data Privacy Act
- Iowa Consumer Data Protection Act (ICDPA)
- Indiana Consumer Data Protection Act
- Tennessee Information Protection Act
- Florida Digital Bill of Rights (FDBR)

3. Information We Collect

- Business identifiers (Ex: legal name, EIN, DUNS number)
- Contact details (Ex: email, phone number, address)
- Login credentials, session activity
- Uploaded documentation (Ex: W-9s, COIs, certifications)
- Technical information (ex: IP address, device type)
- User actions within the Portal (audit logs)

4. Use of Data

Data is used for:

- Supplier vetting, onboarding, and qualification
- Compliance and due diligence review

- Contracting and performance tracking
- Secure communication and audit trail management

5. Data Rights

Depending on your U.S. state of residence, you may have rights to:

- Request access to your personal data
- Request correction or deletion
- Opt-out of data sharing (Note: we do not sell personal data)

You can exercise these rights by contacting:

Email: support@starssmp.com

Phone: (877) 557 5258

6. Data Sharing and Transfers

We do not sell your data. Information is shared only:

- With internal procurement and compliance teams
- With our Service Provider VIVA USA INC as the Data Processor under a signed agreement
- With regulators or auditors as required by law

7. Data Security

- TLS 1.2 encryption for transmission
- AES 256-bit data-at-rest encryption
- SOC 2 Type II and ISO 27001 controls (via Service Provider)
- Secure user authentication, logging, and access controls

8. Data Retention

Data is retained as applicable in accordance with:

- Extant Federal/State/Other Agency acquisition and procurement rules
- Internal business and audit policies
- Regulatory and statutory retention periods

9. Children's Data

This Portal is not intended for data collection from minors.

10. Updates to Policy

We reserve the right to update this Privacy Policy. We will notify registered users through email or in-portal messages if material changes are made.