

# SpaceX Website Privacy Policy

Last updated: January 1, 2021

We don't sell your personal information, but we still have to tell you what we collect from you when you access or use our websites and how we use it. We may update this policy from time to time. Your continued use of this site indicates your agreement to the updated terms.

If you are a prospective, current or past Starlink customer, this Privacy Policy also does not apply to you—please refer instead to our Starlink Customer Privacy Policy found at <https://www.starlink.com/privacy-policy>.

If you are a resident of **California**, our **CCPA Privacy Policy**, found below, also applies to you. If you are located in the **European Economic Area, the United Kingdom, or Switzerland** (collectively “EEA+”), our **EEA+ Privacy Policy**, found below, also applies to you.

If you are under 13 years of age, please do not access or use our website. We do not knowingly collect or maintain personal information from people under 13, and if we find out that personal information of people under 13 has been collected on or through our website, we will delete it.

## 1. What Personal Information Do We Collect?

Depending on how you interact with our website, we may collect the following personal information about you, which we have grouped together as follows:

- **Identity Data**, which may include your first name, last name, and title.
- **Contact Data**, which may include your postal address, email address, and telephone numbers.
- **Financial Data**, which may include your payment card details and billing address.
- **Profile Data**, which may include username and password, purchases made by you, and customer service requests.
- **Technical Data**, which includes your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, and operating system and platform.
- **Usage Data**, which includes information about how you use our website.
- **Marketing and Communications Data**, which includes your preferences in receiving marketing and non-marketing communications from us.

## 2. How Do We Collect Personal Information?

We may collect personal information about you from the following sources:

- **From you**, such as when you subscribe to our publications, purchase an item, request marketing to be sent to you, enter a promotion, complete a survey, or correspond with us by any means. As you interact with our website, we will also automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Publicly available sources**, such as information that you or your organization make publicly available online.

## 3. How We Use Personal Information

We have set out below a description of the purposes for which we may use personal information. For

each purpose, we identify the groups of personal information we use for that purpose (please refer to Section 1 above).

Purposes of Use	Group of Personal Information Concerned
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>(a) Communicating with you about our services, including notifying you about changes to our terms or privacy policy</li> <li>(b) Asking you to take a survey</li> <li>(c) To process and deliver customer orders;</li> <li>(d) to manage payments, fees and charges</li> <li>(e) To communicate about our goods and services and provide customer service</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing and Communications</li> <li>• Financial</li> <li>• Profile</li> </ul>
<ul style="list-style-type: none"> <li>• To enable you to participate in a recognition program, competition or complete a survey</li> <li>• To understand what may be of interest to you, deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you, in accordance with applicable law</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Profile</li> </ul>
<ul style="list-style-type: none"> <li>• To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</li> <li>• To detect, prevent, or otherwise address fraud or security issues</li> <li>• To comply with legal obligations that apply to us, monitor and ensure compliance with our terms, and defend our legal interests in the event of a potential dispute</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> <li>• Usage</li> <li>• Marketing and Communications</li> <li>• Financial</li> <li>• Profile</li> </ul>
<ul style="list-style-type: none"> <li>• To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</li> </ul>	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> <li>• Profile</li> </ul>
<ul style="list-style-type: none"> <li>• To defend our interests in the event of a dispute and comply in good faith with applicable laws, legal processes, and lawful government requests</li> </ul>	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> </ul>

#### 4. With Whom Do We Share Personal Information?

We may share your personal information with the following categories of third parties:

- **Our Service Providers:** We may transfer your personal information to our service providers, some of which may include our affiliates, as necessary for them to provide services to us in connection with our fulfilment of the purpose set out above. For example, we may rely on service providers to host and maintain our website, perform backup and storage services, process payments, collect debts, provide customer service, transmit communications, deliver products and prizes, and perform analytics services. Our service providers are located and process personal information in the following countries: United States and United Kingdom.

- **Government Agencies, Regulators and Professional Advisors:** Where permitted or required by applicable law, we may also need to transfer your personal data to government agencies and regulators (e.g., tax authorities, courts, and government authorities) to comply with our legal obligations, and to external professional advisors as necessary to defend our legal interests.
- **Organizations Involved in Business Transfers:** In the event of a merger, reorganization, dissolution or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal information, will be transferred to the surviving entity in a merger or the acquiring entity. Such information will be transferred in accordance with applicable law.

## 5. How Do We Protect Personal Information?

We maintain physical, administrative and technological safeguards intended to prevent personal information from accidental or unauthorized loss, alteration access or use. We have put in place procedures to deal with any suspected breach of personal information and will notify individuals and any applicable regulator of a breach where we are legally required to do so.

## 6. Your Privacy Rights

Under applicable laws, you may have rights to access, update, rectify, port or erase certain personal information that we have about you or restrict or object to certain activities in which we engage with respect to your personal information. If you have such rights and your request complies with the requirements under applicable laws, we will give effect to your rights as required by law.

To exercise any rights you may have under applicable privacy laws, please contact us using the details in the “Contact Us” section below. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## 7. Links to Other Websites

Our website may contain links to other websites, which may have privacy policies or notices that differ from ours. We are not responsible for the collection, processing or disclosure of personal information collected through other websites. We are also not responsible for any information or content contained on such websites. Links to other websites are provided solely for convenience. Your usage and browsing on any such website is subject to that website’s own policies. Please review the privacy notices posted on other websites that you may access through our website. We may provide you with additional or different privacy notices in specific instances which describe how your personal information is collected and used for a specific service.

## 8. Contact Us

You may contact us using the following details:

Email address: [privacy@spacex.com](mailto:privacy@spacex.com)

Postal address: ATTN: Privacy/Legal, Space Exploration Technologies Corp., 1 Rocket Road, Hawthorne, CA 90250

# SUPPLEMENTAL CCPA PRIVACY POLICY

*Last updated January 1, 2021*

As mentioned in our other privacy disclosures, we don't sell your personal information, but the privacy laws of California, including the California Consumer Protection Act of 2018 ("**CCPA**"), require us to provide some information about our data processing practices to California residents.

If you are a resident of California and not part of our workforce, this Supplemental CCPA Privacy Policy applies to you. However, this Privacy Policy does not reflect our collection, use or disclosure of California residents' personal information where an exception under the CCPA applies.

## **1. Your Personal Information: Right to Know, Request Deletion, and Opt-Out**

As a California resident, you have the right to request that we disclose what PI we collect, use, and disclose about you specifically ("**right to know**"), and the right to ask that it be deleted. To submit a request to exercise the right to know or to delete, please submit a request, with the details you would like to know or delete, by email to [privacy@spacex.com](mailto:privacy@spacex.com) and include "California Request to Know or Delete" in the subject line, or by mail to ATTN: Privacy/Legal, Space Exploration Technologies Corp., 1 Rocket Road, Hawthorne, CA 90250.

We may need to verify your identity, and/or ask you to confirm your request. If we deny your request, we will explain why.

You also have the right to opt-out of the sale of your personal information by a business. We do not sell personal information, so there is no need to opt-out. We do not have actual knowledge that we sell the personal information of minors under 16 years of age.

## **2. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights**

You have a right not to receive discriminatory treatment by us for the exercise of your privacy rights under the CCPA.

## **3. Right to Be Informed of Financial Incentives**

We do not currently offer any financial incentives in exchange for the retention or sale of California residents' personal information.

## **4. Authorized Agent**

You can designate an authorized agent to make a request under the CCPA on your behalf if your authorized agent is a natural person or a business entity registered with the Secretary of State of California, and you sign a written declaration that you authorize the authorized agent to act on your behalf. If you use an authorized agent to submit a request under the CCPA, please have the authorized agent take the following steps in addition to the steps described in Section 1 above: (1) Mail a notarized copy of your written declaration authorizing the agent to act on your behalf to the address listed below (we will reimburse you for the costs of notarizing the declaration and mailing it to us if you provide a receipt showing the costs paid and they are reasonable); and (2) Provide any information we request from you to verify your identity and that you provided the authorized agent permission to submit a request under the CCPA on your behalf.

## 5. What we Collect

### *Collection of Personal Information*

We have set out below the categories of personal information we have collected about California residents in the past 12 months as well as the sources, business or commercial purposes, and categories of third parties with whom we shared the personal information. We collect this information directly from California residents who use our website or subscribe for our services. If a California resident uses their organization’s Starlink subscription, we may collect some of this information from their organization. We may also collect some information about a California resident’s interests and preferences from a third-party source where they or their organization make such information publicly available, such as on their organization’s public website.

Category of personal information	Corresponding reference to category of personal information under CCPA definition of personal information (Cal. Civ. Code § 1798.140(o)(1))	Business or commercial purposes for which information was collected	Category of third parties with whom we shared the personal information
Name Title Username or similar identifier  Account Password Delivery/service address  Email address Telephone number  Details of products and services customers have purchased from us  Customer service requests, interests, preferences, feedback and survey responses	(A) Name (A) Name (A) Unique personal identifier (B) Signature (A) Postal Address  (A) Email address (B) Telephone number (D) Records of products or services purchased (D) Commercial information (D) Tendencies (H) Electronic information	<ul style="list-style-type: none"> <li>• To process and deliver customer orders</li> <li>• To manage payments, fees and charges</li> <li>• To manage our relationship with customers, such as communicating with them about our goods and services, providing customer service, and notifying them of changes to our terms or privacy policy</li> <li>• To administer and protect our business and services, including troubleshooting, and performing data analysis, testing, system maintenance, support, reporting and hosting of data</li> <li>• To detect, prevent, or otherwise address fraud, security or technical issues, including by monitoring and enforcing compliance with our terms of use,</li> </ul>	Service providers that process personal information solely on our behalf and which are subject to data security measures

		<p>appropriate use policies, and privacy policies</p> <ul style="list-style-type: none"> <li>• To defend our interests in the event of a dispute</li> <li>• To comply in good faith with applicable laws, legal processes, and lawful government requests</li> <li>• To understand what may be of interest to a customer</li> <li>• To deliver relevant news, offers and other content to a customer and measure and understand the effectiveness of the content</li> <li>• To ask and enable a customer to take a survey</li> </ul>	
<p>Billing address</p> <p>Payment card details</p>	<p>(B) Financial information</p> <p>(B) Credit card number, debit card number</p>	<ul style="list-style-type: none"> <li>• To process and deliver customer orders;</li> <li>• To manage payments, fees and charges</li> <li>• To manage our relationship with customers</li> <li>• To administer and protect our business and services</li> <li>• To detect, prevent, or otherwise address fraud or security issues</li> <li>• To defend our interests in the event of a dispute and comply in good faith with applicable laws, legal processes, and lawful government requests</li> </ul>	Same as above
<p>Website technical data, which includes the following information about users of our online portal and services: Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and the ways in which the user uses or interacts with our online portal and services.</p> <p>Customer technical data, which includes data about throughput delivered to a customer over time, service connectivity, latency,</p>	<p>(A) Internet Protocol address</p> <p>(F) Internet or other electronic network activity information</p>	<p>Same as above, and:</p> <ul style="list-style-type: none"> <li>• To use data analytics to debug, optimize, and improve our products and services, marketing, customer relationships and experiences</li> </ul>	Same as above

<p>quality metrics, sky obstruction data, device orientation and location, WiFi quality metrics, WiFi device information, and the public IP address information assigned to a customer over time.</p> <p>Hardware and network technical data, which includes data about the performance of user terminals and other hardware and software that we provide to customers, including data about the usage of such hardware and software, and their temperatures, power usage, signal strength, throughput, orientation, location, and software version information.</p>			
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**6. Contact for More Information**

If you have questions or concerns regarding our privacy policy or practices, you may contact us:

Email address: [privacy@spacex.com](mailto:privacy@spacex.com)

Postal address: ATTN: Privacy/Legal, Space Exploration Technologies Corp., 1 Rocket Road, Hawthorne, CA 90250

## SUPPLEMENTAL EEA+ PRIVACY NOTICE

*Last Updated January 1, 2021*

If you are located in the **European Economic Area, the United Kingdom, or Switzerland (EEA+)**, and access our website, this Supplemental EEA+ Privacy Notice applies to you.

As mentioned in the SpaceX Privacy Policy, we don't sell your personal information, but the data protection laws of the EEA+, including the General Data Protection Regulation and the so-called UK GDPR (together, "**GDPR**"), require us to provide information about our data processing practices certain people in the EEA+.

### 1. Who Is the Data Controller?

Space Exploration Technologies Corp. is the controller and responsible for your personal data. Our GDPR representative is Starlink Netherlands BV.

With effect from December 31, 2020 at 11pm GMT – our representative in the United Kingdom is Starlink Internet Services UK Limited.

For information about how to contact us or our representatives, please see Section 7 of this Supplemental EEA+ Privacy Notice.

### 2. What Are Our Legal Bases for Processing Personal Data?

We rely on the following legal bases to process your personal data, as appropriate:

- necessary for us to perform a contract with you or take steps at your request prior to entering into a contract ("**Contract Performance Legal Basis**"), to comply with an applicable legal obligation ("**Legal Obligations Legal Basis**"), or to realize a legitimate interest based on an assessment of that interest and your privacy and other fundamental interests ("**Legitimate Interest Legal Basis**"); and
- is performed according to your consent ("**Consent Legal Basis**").

More information is provided below. Please contact us if you need details.

Purpose of Use or Disclosure	Legal Basis and Legitimate Interest
To manage our relationship with you which will include: (a) Communicating with you about our services, including notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	<ul style="list-style-type: none"><li>• If we are legally obligated to respond to your request or inquiry, Legal Obligations Legal Basis. In all other cases, Legitimate Interest Legal Basis, including to maintain the quality of and keep our records updated, and understand how customers use our website so that we can improve them for you and others.</li></ul>



<p>To process and deliver your order including:  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us</p>	<ul style="list-style-type: none"> <li>• Contract Performance Legal Basis based on our Terms of Service, Terms of Sale or other applicable contract.</li> <li>• If the processing of your personal data is necessary for us to collect amounts owed to us, Legitimate Interest Legal Basis based on this legitimate interest.</li> </ul>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> <li>• If the processing is necessary to comply with an applicable contractual obligation with you, Contract Performance Legal Basis per the applicable contract.</li> <li>• If the processing is necessary to comply with an applicable legal obligation, such as under data security laws, Legal Obligations Legal Basis.</li> <li>• In all other cases, Legitimate Interest Legal Basis, including as necessary to run our business, provide administration and IT services, maintain network security, and prevent fraud.</li> </ul>
<p>To understand what may be of interest to you, deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you, in accordance with applicable law</p>	<ul style="list-style-type: none"> <li>• We process your personal data and contact you for direct marketing purposes on the Consent Legal Basis as required by applicable law.</li> <li>• In all other cases, Legitimate Interests Legal Basis as necessary to understand how customers use our products and services, to develop and improve them for you and others, to remain a competitive business, and to inform our marketing strategy.</li> </ul>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> <li>• Legitimate Interests Legal Basis as necessary to define types of customers for our products and services, to keep our website updated and relevant, to develop our business, and to inform our marketing strategy.</li> </ul>
<p>To comply with legal obligations that apply to us, monitor and ensure compliance with our terms, and defend our legal interests in the event of a potential dispute</p>	<ul style="list-style-type: none"> <li>• Contract Performance Legal Basis based on our Terms of Service, Terms of Sale or other applicable contract.</li> <li>• If necessary to comply with applicable laws, Legal Obligations Legal Basis per applicable laws.</li> <li>• In all other applicable cases, Legitimate Interest Legal Basis to prevent fraud, danger or other unlawful conduct, and to defend our legitimate legal interests.</li> </ul>
<p>Disclose your personal data to our service providers (<i>i.e.</i>, processors) as necessary to achieve the above purposes</p>	<ul style="list-style-type: none"> <li>• The lawful bases listed above apply to any disclosure necessary to further the corresponding purpose.</li> </ul>
<p>Disclose your personal data to a prospective or actual purchaser or seller in the context of a merger, acquisition or other reorganization or sale of our business or assets.</p>	<ul style="list-style-type: none"> <li>• If the confidential processing of your personal data is necessary for us to evaluate or execute such a transaction while protecting our trade secrets or sensitive business information and your privacy interests to do not override such interests, Legitimate Interest Legal Basis based on the pursuit of such legitimate interests.</li> <li>• Otherwise, we will obtain your consent and rely on the Consent Legal Basis.</li> </ul>

Disclose your personal data to courts, law enforcement or regulatory	<ul style="list-style-type: none"> <li>• If necessary to comply with applicable laws, Legal Obligations Legal Basis per applicable laws.</li> </ul>
authorities as permitted or required by applicable law.	<ul style="list-style-type: none"> <li>• In all other applicable cases, Legitimate Interest Legal Basis to prevent fraud, danger or other unlawful conduct, and to defend our legitimate legal interests.</li> </ul>

### 3. How Do We Protect Personal Data if we transfer it internationally?

We may transfer your personal data to service providers and business partners outside of the EEA and/or UK.

Some of these recipients are located in countries in respect of which either the European Commission and/or UK Government (as and where applicable) has issued adequacy decisions, in which case, the recipient's country is recognized as providing an adequate level of data protection under UK and/or European data protection laws (as applicable) and the transfer is therefore permitted under GDPR Art. 45.

Some recipients of your personal data may be located in countries outside the EEA and/or the UK for which the European Commission or UK Government (as and where applicable) has not issued adequacy decisions in respect of the level of data protection in such countries ("**Restricted Countries**"). For example, the United States is a Restricted Country. Where we transfer your personal data to a recipient in a Restricted Country, we will either:

- enter into appropriate data transfer agreements based on so-called Standard Contractual Clauses approved from time-to-time under GDPR Art. 46 by the European Commission, the UK Information Commissioner's Office or UK Government (as and where applicable); or
- rely on other appropriate means permitted by GDPR Ch. V, which establish that such recipients will provide an adequate level of data protection and that appropriate technical and organizational security measures are in place to protect personal data against accidental or unlawful destruction, loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.

You may ask for a copy of such appropriate data transfer agreements by contacting us using the contact details below.

### 4. How Long Do We Keep Personal Data?

We will only keep personal data for as long as reasonably necessary to fulfil the purposes we collected it for. We may keep your personal data for a longer period to comply with our legal obligations or in the event of a complaint or litigation.

### 5. Your Rights

Regarding your personal data, You may have the right to:

- **Request access** (commonly known as a "data subject access request") - enables you to receive a copy of the personal data we hold about you and information about how it is processed.

- **Request correction** - enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** - enables you to ask us to delete or remove personal data where there is no lawful reason for us continuing to store or process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that will be notified to you, if applicable, at the time of your request.
- **Object to processing** - where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing** - enables you to ask us to suspend the processing of your personal data if, (i) you want us to establish the data's accuracy; (ii) where our use of the data is unlawful but you do not want us to erase it; (iii) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

To exercise these rights, please contact us using the contact details below.

Although we urge you to contact us first to find a solution for every concern you may have, you always have the right to lodge a complaint with your competent data protection authority.

## 6. Your Choices

You are not required to provide personal data to us but if you do not provide any personal data to us, you may not be able to use our website or we may not be able to authenticate and assist you with your orders, inquiries or requests, and we generally will not be able to provide you with our products and services.

## 7. Contact Us

You may contact us using the following details:

Email address: [privacy@spacex.com](mailto:privacy@spacex.com)

Postal address: ATTN: Privacy/Legal, Space Exploration Technologies Corp., 1 Rocket Road, Hawthorne, CA 90250

You may contact our representative in the EU using the following details:

Email address: [privacy@spacex.com](mailto:privacy@spacex.com)

Postal address: Starlink Netherlands BV, C/O Tesla Motors Netherlands B.V.: Burgemeester Stramanweg 122, 1101EN Amsterdam

You may contact our representative in the UK using the following details:

Email address: [privacy@spacex.com](mailto:privacy@spacex.com)

Postal address: Starlink Internet Services UK Limited: 100 New Bridge St., London, EC4V 6JA