

Confidentiality Policy

Effective date: September 18, 2026

Fellstead is operated by Solten Ventures LLC.

This Policy describes how Fellstead treats non-public information submitted in connection with diagnostics and related services.

1. Our approach

Fellstead is designed to work with information that may be commercially sensitive. Solten Ventures LLC treats non-public customer information as confidential and uses it only as reasonably necessary to provide and operate the requested service, subject to the exceptions below.

2. What we treat as confidential

Confidential information may include non-public information concerning strategy, customers, products, pricing, financial performance, forecasts, fundraising, employees, technology, intellectual property, suppliers, operations, research, internal metrics, or other business matters disclosed through questionnaires, documents, email, or other communications.

3. Permitted use

We use confidential information only as reasonably necessary to:

- perform the requested diagnostic or related service;
- analyze submitted evidence and prepare deliverables;
- ask follow-up questions and communicate with you;
- maintain service quality, security, records, and support;
- comply with law and enforce applicable agreements.

4. Internal and service-provider access

Access to confidential information is limited to personnel, contractors, professional advisors, and service providers who reasonably need access for the purposes above and who are subject to confidentiality, privacy, professional, or contractual obligations appropriate to their role.

5. What is not confidential

Confidentiality obligations do not apply to information that Fellstead can reasonably demonstrate:

- was publicly available without breach of an obligation;
- was lawfully known to us before disclosure without a duty of confidentiality;
- was received lawfully from a third party without a duty of confidentiality;
- was independently developed without use of the confidential information;
- was approved by you in writing for disclosure.

6. Required disclosure

If disclosure is required by law, subpoena, court order, or government request, we may disclose the minimum information reasonably necessary. Where legally permitted and practicable, we will seek to provide advance notice so you may pursue appropriate protection.

7. No public case studies without permission

Fellstead will not publicly identify a customer, publish submitted confidential information, quote a diagnostic, or use a customer as a case study, testimonial, or marketing example without permission.

8. Security and storage

We use reasonable administrative, technical, and organizational measures designed to protect confidential information. Information may be processed or stored using reputable third-party infrastructure and service providers where reasonably necessary to operate Fellstead.

9. Retention and deletion

Confidential materials may be retained for as long as reasonably necessary to provide the service, maintain business and legal records, resolve disputes, improve operational quality, or meet legal obligations. You may request deletion of submitted materials by contacting us, subject to legal, security, backup, and legitimate record-retention requirements.

10. Aggregated and de-identified information

Fellstead may use information that has been aggregated or de-identified so that it does not reasonably identify a customer or reveal customer confidential information, for purposes such as product improvement, benchmarking methodology, research design, quality assurance, and service development.

11. Relationship to separate agreements

This Policy is a general Fellstead policy and is not intended to replace a separately signed non-disclosure agreement or confidentiality agreement. If Solten Ventures LLC and a customer enter into a separate written agreement with different confidentiality terms, the separate agreement controls to the extent of any direct conflict.

12. No fiduciary relationship

Confidential treatment of submitted information does not create a fiduciary, advisory, agency, partnership, employment, or professional-client relationship beyond the contractual obligations expressly agreed between the parties.

Contact

Questions about this policy may be sent to hello@fellstead.com.