



# EVRIONTA PRIVACY POLICY

Last updated: 25 march 2026

## Preamble

EVRIONTA is concerned with the privacy of the EVRIONTA platform (the "Platform") members, and uses its best efforts to protect it. In particular, EVRIONTA undertakes to ensure a level of protection of personal data that is in accordance with the General Data Protection Regulation ("GDPR") including any regulations implementing, complementing or replacing the GDPR, where appropriate.

EVRIONTA collects and processes personal data relating to the Members. "Members" means the users, who have both registered and not registered with the Platform. This Privacy policy (the "Privacy Policy") describes how the personal data relating to the Members will be collected and processed.

The personal data shall be processed by "EVRIONTA BIOHACKING" LLP, Address: Kazakhstan, Astana city, Saryarka district, street Kenesary, building 8, n. 103, postal code 010000 ("EVRIONTA").

EVRIONTA also collects data relating to the Members, and more generally to the Platform users, by means of cookies, as described in more detail in EVRIONTA'S cookie policy.

By confirming the respective notification displayed on the Platform, the Member expressly acknowledges and agrees that EVRIONTA is entitled to collect, process, and store their Personal Data in accordance with the terms set forth in this Privacy Policy.

Such confirmation shall constitute the Member's informed, specific, and unambiguous consent to the processing of their Personal Data for the purposes described herein. The Member acknowledges that they have been provided with clear and comprehensive information regarding the categories of Personal Data collected, the purposes of such collection, and the rights afforded to them under applicable data protection legislation.

For the purposes of this Privacy Policy, "Personal Data" shall mean any information or set of information relating collected under this Privacy Policy. EVRIONTA ensures the appropriate protection of Personal Data as required under the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (Strasbourg, 28 January 1981).

"Processing of Personal Data" shall mean any operation or set of operations performed upon Personal Data, including but not limited to collection, registration, accumulation, storage, adaptation, alteration, retrieval, use, dissemination (distribution, transfer, sale), anonymisation, or destruction, including by means of automated information systems.

## 1. Use of Technologies for Data Collection

EVRIONTA employs various technologies to collect information from the Member's device and about the Member's activity on the Platform. EVRIONTA reserves the right to use automated scripts, plugins, and other software tools for the collection, processing, storage, and transmission of Personal Data and other information previously uploaded or submitted by the Member during their use of the Platform.

EVRIONTA may automatically collect certain data from the Member's browser or device when the Member accesses the Platform, subject to the Member's consent to the processing of their Personal Data. Such information may include the Member's IP address, device identifier and type, browser type and language, operating system, access time, and geographic location of the access device.

EVRIONTA may also collect other data and information necessary for the provision of its services. In such cases, the Member shall receive a request to provide separate consent for the collection of such additional data.

EVRIONTA may utilise standard internet technologies, including but not limited to web beacons and similar tracking tools, to monitor usage of the Platform. EVRIONTA may embed web beacons in advertisements or e-mail communications to determine whether such messages have been viewed. The information collected by such means may be used to customise services offered to Members, deliver targeted advertising, and assess the overall effectiveness of online advertisements, content, or activities.

## 2. Which personal data does EVRIONTA collect?

EVRIONTA collects personal data directly from each Member when he/she registers with the Platform. EVRIONTA notably collects:

- data relating to his/her registration: his/her login, alias, and e-mail address (the password, if collected, is then encrypted in a non- reversible manner (hashing), and is not collected as such);
- data relating to the profile of a Member who is an auto-entrepreneur or is a one-person business: its registered name, his/her full name, his/her registration number where appropriate, VAT number, registered address, contact details (telephone number, e-mail address), a copy of the legal representative's identity card or passport;
- if the Member is a legal entity, data relating to the contact persons within the Member: the full name of a contact person who is an individual, the full name of the legal representatives or of any person who is duly authorised to make commitments on behalf of the Member, and their respective contact details (telephone number, e- mail address);
- data relating to any orders for products that were placed through the Platform: product(s) purchased, transaction number, address for deliveries;
- bank details: bank details and SEPA direct debit mandate.

Other data will be collected directly from each Member during the use of the Platform, or when the Member communicates through the Platform. These data include, notably:

- information given by a Member when he/she publishes an opinion on the Platform;
- communication between Members (content of the communication, nature of the complaint, returned products, etc.);
- data relating to the consultation of any e-mails sent by EVRIONTA to the Members (administrative e-mails or canvassing e-mails);

The data collected for the purposes of performing the terms and conditions of use, complying with our statutory or regulatory obligations, or the data that are necessary to enter into the terms and conditions of use, are data which provision is compulsory.

If such data are not provided, EVRIONTA will not be in a position to make all of the Platform functionalities available.

## 3. Purposes of and lawful bases for the collection of the personal data

EVRIONTA collects the personal data relating to Members, which are listed in Section 2 of this policy, in order to provide the best service possible to Members. This article gives the Members an overview of how their personal data shall be processed in the context of their use of the Platform.

Data concerned	Purposes	Legal bases
<b>Identification and contact data</b>	<ul style="list-style-type: none"> <li>• Account management and requested service provision</li> <li>• Marketing (newsletters, service presentations and events)</li> <li>• Prevention of non- payment, fraud and identity theft (profiling)</li> </ul>	<ul style="list-style-type: none"> <li>• Contract between the Member and EVRIONTA</li> <li>• Our legitimate interest</li> </ul>
<b>Professional Activity Data</b>	<ul style="list-style-type: none"> <li>• Account management and requested service provision</li> <li>• Prevention of non- payment, fraud and identity theft (profiling)</li> <li>• Marketing (newsletters, service and event presentations)</li> </ul>	<ul style="list-style-type: none"> <li>• Contract between the Member and EVRIONTA</li> <li>• Compliance with our legal obligations (e.g., accounting)</li> <li>• Our legitimate interest</li> </ul>
<b>Platform Activity Data</b>	<ul style="list-style-type: none"> <li>• Requested service provision</li> <li>• Fraud prevention and terms compliance monitoring</li> <li>• Product and service improvement</li> <li>• Marketing (newsletters, service and event presentations)</li> </ul>	<ul style="list-style-type: none"> <li>• Contract between the Member and EVRIONTA or between Brand and Retailer</li> <li>• Compliance with our legal obligations</li> <li>• Our legitimate interest</li> </ul>
<b>Transaction Data</b>	<ul style="list-style-type: none"> <li>• Requested service provision (order or payment terms request)</li> <li>• Prevention of non- payment, fraud and identity theft (profiling)</li> </ul>	<ul style="list-style-type: none"> <li>• Contract between the Member and EVRIONTA or between Brand and Retailer</li> <li>• Compliance with our legal obligations</li> <li>• Our legitimate interest</li> </ul>
<b>Interaction Data</b>	<ul style="list-style-type: none"> <li>• Customer relationship monitoring</li> <li>• Service improvement</li> <li>• Marketing (newsletters, services, promotions and events)</li> </ul>	<ul style="list-style-type: none"> <li>• Contract between the Member and EVRIONTA</li> <li>• Our legitimate interest</li> <li>• The Member's consent</li> </ul>
<b>Third-Party Data</b>	<ul style="list-style-type: none"> <li>• Service provision requested by third parties or the Member</li> <li>• Customer relationship monitoring</li> <li>• Marketing (referral, newsletter, events)</li> <li>• Fraud and identity theft prevention (profiling)</li> <li>• Legal obligations compliance</li> <li>• Terms of use compliance monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Contract between the Member and EVRIONTA</li> <li>• Our legitimate interest</li> <li>• The Member's consent</li> <li>• Compliance with our legal obligations</li> <li>• Our legitimate interest</li> </ul>

## 4. The recipients of the personal data

The personal data collected and processed by EVRIONTA may be disclosed to the following recipients or categories of recipients:

- to individuals authorised by EVRIONTA to process the personal data of Members, and who have first signed a non-disclosure agreement, including to EVRIONTA employees;
- to the carriers, who will act under the responsibility of the Member shipping the order;
- to the providers of services, to whom EVRIONTA subcontracts all or part of the processing activities carried out by EVRIONTA in relation to the personal data of Members, including:
  - the payment service provider, in relation to secure online payment transactions;
  - the financial service provider for eligible retailers, the company;
  - the host of the Platform and data;
  - the Platform maintenance service provider;
  - the analytics and marketing service providers;
  - the e-mailing service provider, in relation to the sending of transactional e-mails relating to the orders placed through the Platform;
  - the e-mailing service provider, in relation to the sending of newsletters.

- The subcontractors, which EVRIONTA shall use, provide sufficient guarantees as required by the applicable data protection regulations. These subcontractors only have access to the data that are necessary to the performance of their tasks, and they are not authorised to process the data of Members for any other purposes.

## 5. Data retention period

EVRIONTA shall store the personal data of the Members only for the duration that is strictly necessary for the purposes listed in article 3. The data of the Members shall then be archived, with restricted access, for an additional duration so that EVRIONTA can comply with its legal and/or

regulatory obligations in relating to the archiving and retention of data. On the expiry of this additional duration, the data of the Members shall be permanently deleted from EVRIONTA'S databases.

## 6. Protection of Personal Data

EVRIONTA implements appropriate security measures to protect the Personal Data of its Members from unauthorised access and disclosure. However, no system can be fully secure, and EVRIONTA cannot guarantee the absolute security of any information transmitted or stored. Members are also responsible for taking appropriate steps to safeguard their own information and are advised not to transmit personal data through unsecured channels.

EVRIONTA safeguards the Personal Data it collects in accordance with generally accepted standards within the online community, and in strict compliance with international norms governing the collection, processing, storage, and transfer of Personal Data of internet users.

## 7. The rights of the Members

The Members shall have a right of access, a right to rectification, a right to erasure, and a right to the portability of their personal data, as well as a right to object to the processing of their personal data, the right to withdraw their consent and a right to restriction of processing, in the conditions set out by applicable regulations.

The Members may at any time object to the processing of their data for direct marketing purposes or in accordance with applicable regulations.

The Members may send their request to EVRIONTA :

- in writing, to the following address: 141400, Moscow Region, Khimki, Moskovskaya St., bldg. 14A, floor/ office 5/12;
- by e-mail, to: info@evrionta.com

## 8. Deletion of Personal Data

The Member shall have the right to request the deletion of their Personal Data collected and processed by EVRIONTA. Such a request may be submitted at any time by sending a written notice to EVRIONTA at the following e-mail address: info@evrionta.com

Upon receipt of a valid deletion request, EVRIONTA shall take all reasonable steps to delete the Member's Personal Data from its systems, unless the retention of such data is required for the fulfilment of legal obligations or the establishment, exercise, or defence of legal claims.

The Member acknowledges that the deletion of certain Personal Data may affect their ability to access or use certain functionalities of the Platform.

## 9. Changes to this Privacy Policy

EVRIONTA reserves the right to amend and/or update this Privacy Policy at any time, at its sole discretion. Any such amendments and/or updates shall become effective upon publication of the revised Privacy Policy on the Platform, together with an indication of the date on which it was last updated.

In the event of any changes to the Privacy Policy, EVRIONTA shall provide appropriate notice to the Members, which may include, without limitation, notification via e-mail and/or the display of a prominent notice on the Platform.

Members are encouraged to review this Privacy Policy periodically in order to remain informed of any updates or modifications concerning the processing of their Personal Data.