

# PRIVACY POLICY

This Privacy Policy is part of the User Agreement (hereinafter – the “**Agreement**”) establishing terms and conditions for use of EQVI, an application for mobile devices (hereinafter – the “**Application**”), available at Europe, CIS, Asia and by accepting the terms of the Agreement You give your consent to the processing of your personal data in accordance with terms of this Privacy Policy set forth herein.

## 1. General terms

1.1. EQVI LLC, organized and existing in accordance with legislation of the USA (hereinafter – the “**Operator**”) acts both as the controller and the processor of Your personal data as provided for by Regulation (EU) 2016/679 of the European Parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR).

1.2. The contact details for the data protection officer of the Operator and other representatives of the Operator are indicated in Section 12 of this Privacy Policy.

## 2. The purposes for which Your personal data will be used by the Operator:

2.1. The Operator may use Your personal data for the following purposes:

2.1.1. Your Identification for entering into and performance of the Agreement with You;

2.1.2. Performance of the terms of the Agreement with You, including the following activities required for due performance of the Agreement:

- a) Selection of clothing, footwear and accessories (hereinafter – the “**Products**”) offered at online stores of third parties (hereinafter – the “**Stores**”) in accordance with Your preferences to the Products determined via use of the Application;
- b) Promotion of the Application and Operator services, including informing You about Operator’s new products, new functions of the Application as well as promos and discounts,
- c) Development, improvement, modernization, updating of services and products of the Operator
- d) Informing You in connection with performance of the Agreement
- e) Payment of part of money spent by You on purchases at the Stores (hereinafter – the “**Cashback**”) in accordance with the Agreement, applicable law and requirements of the payment systems used for Cashback payment
- f) Analysis of the consumer market with consideration of Your personal data and using the Application for marketing of products and services of Operator (hereinafter referred to as the “**Market Analysis**”);
- g) Compliance with the requirements of the applicable law or the decision of a court or other competent state or municipal authority;

## 3. The personal data that will be used by the Operator

3.1.1. You are solely responsible for updating and maintaining the correct information in Your Personal Account in the Application. You may amend Your personal information at any time in Your Personal Account.

3.1.2. The information You provide the Operator with:

- (i) Your name
- (ii) Your mobile phone number
- (iii) Your age range;
- (iv) Your hair color;
- (v) Your eye color;
- (vi) Currency used;
- (vii) Details of Your bank payment card or other electronic means of payment.

- (viii) Your name and surname (if required by payment systems)
  - (ix) Your physical address (if required by payment systems)
  - (x) Your email address (if required by payment systems)
- 3.1.3. The information that the Operator receives from other sources:
- (i) Information about purchased Products
  - (ii) Amount paid for the Products
  - (iii) Your identification number (ID) in the Application, assigned after registration
  - (iv) Your IP address
  - (v) Your geolocation
  - (vi) Identifiers (UUID, model, and others) of Your mobile device
  - (vii) Your operating system and its version.
  - (viii) Time zone.
  - (ix) Language used.
  - (x) Cookies (small files stored in the memory of Your device, designed to personalize Your activity and behavior in the Application and Stores).

#### **4. Methods of Your personal data processing**

4.1. The way the Operator uses Your personal data depends on the specific purposes for processing it.

##### **4.1.1. Use of personal data for identification for registration in the Application**

In order to obtain Your personal information for execution of the Agreement, the Operator must obtain sufficient information to establish Your identity, indicated in paragraphs (i) and (ii) of clause 3.1.2. hereof. The Operator collects, records, stores and systematizes this information through automated means as well. Such personal data is processed until termination of the Agreement in accordance with terms and conditions of the Agreement.

##### **4.1.2. Use of personal data for performance of the Agreement**

For the purposes of due performance of the Operator's obligations under the Agreement, and, in particular, to select the Products most suitable to You according to Operator's evaluation, the Operator processes the information indicated in paragraphs (i) to (v) of clause 3.1.2. hereof, (iii) to (x) of clause 3.1.3. hereof. By using automated processing of the aforementioned information, the Operator forms derived data about Your preferences that is used for the purposes, indicated in paragraphs (a)-(d), (f) and (g) of clause 2.1.2. hereof.

The operator collects, records, systematizes, accumulates, and uses the personal data listed above. The Operator may share personal data indicated in clause 3.1.3. hereof with the Stores, advertising platforms and services, partner networks that the Operator cooperates with on the basis of agreements for the purposes of receipt of commission fees for purchase of the Products.

The Operator may use aforementioned personal data to send notifications to Your personal account or Your mobile phone number, which may concern operation of the Application, new functions of the Applications and special offers to users of the Application.

The aforementioned personal data is processed until termination of the Agreement in accordance with terms and conditions of the Agreement.

##### **4.1.3. Use of personal data for Cashback payment**

In order to ensure due and timely Cashback payment, the Operator requires information on the methods and details to use to transfer the Cashback and to be able to check the status of the payment execution. For this purpose, the Operator obtains and processes the information indicated in paragraphs (vi) to (x) of clause 3.1.2. hereof. The Operator additionally obtains information on the possibility, reception, and status of the payment execution from payment system operators, banks, communications providers, and other intermediaries participating in the Cashback payment. This information is collected, recorded, systematized, accumulated, and used in the processing of payment records and transferring Cashback.

The aforementioned personal data is processed until termination of the Agreement in accordance with terms and conditions of the Agreement.

#### **4.1.4. Use of personal data in the Market Analysis**

Market Analysis is performed by the Operator with consideration of the behavior and preferences of Application users for the growth of Operator's business, which may subsequently contribute to improving the quality of Operator's services. For the purposes of Market Analysis the Operator collects, records, systematizes, accumulates, and uses information indicated in paragraphs (i) to (vi) of clause 3.1.2. and clause 3.1.3. hereof. This information may be shared with third parties subject to prior depersonalization of this information. This information is considered for development of the Operator's market strategy, as well as the services and products of the Operator.

The aforementioned personal data is processed until termination of the Agreement in accordance with terms and conditions of the Agreement.

### **5. Data transfer outside the European Union**

5.1. The Application may be maintained in the United States of America. By using the Application, you authorize the export of personal data to the USA and Republic of Armenia and its storage and use as specified in this Privacy Policy. The Operator may transfer personal data from the EU to the USA and Republic of Armenia and other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. Information stored in the USA and Republic of Armenia may be subject to lawful requests by the courts or law enforcement authorities in the USA and Republic of Armenia.

5.2. If you are located in the EU, please contact the Operator via the contact details indicated in section 12 hereof if you require further information on the specific mechanism used by the Operator when transferring your personal data out of the EEA.

### **6. The grounds for use of your personal data by the Operator**

6.1. The Operator processes Your personal data only if one of the following conditions is met:

6.1.1. You have given Your consent to process Your personal data as provided for in the Agreement.

6.1.2. The processing of Your personal data is required for the performance of the Agreement.

6.1.3. The processing of Your personal data is necessary in accordance with the requirements of the applicable law, a decision of a court or other competent state or municipal authority.

6.1.4. You have made such data publicly available and accessible.

### **7. Storage of personal data**

7.1. Recording, systematization, accumulation, storage, improvement (updating, modification), extraction of Your personal data is performed with the use of databases located on the territory of USA and Republic of Armenia.

### **8. Protection of personal data confidentiality**

8.1. The Operator takes reasonable and appropriate administrative, technical, organizational, and physical security and risk management measures in accordance with market standards and applicable laws to ensure that your Personal Data is adequately protected against accidental or unlawful destruction, manipulation, damage, loss or alteration, unauthorized or unlawful access, disclosure or misuse, and all other unlawful forms of processing of your Personal Data in possession of the Operator.

8.2. The Operator establishes control access to our facilities and applies secure destruction to media containing your personal data. The Operator uses network and information security technologies, monitors the systems and data centers to ensure that they comply with security policies. The technology safeguards are continuously adapted and improved in line with technological developments.

8.3. The Operator conducts regular training and awareness programs on security and privacy, to ensure that the Operator's employees and contractors understand the importance of protecting Your personal data, and that they learn and maintain the necessary knowledge and skills effectively to protect it in practice.

8.4. The security organization of the Operator applies policies, standards and supporting security controls at the level appropriate to the risk level and the services provided. In addition, appropriate security controls are communicated to application owners and technology teams to support secure development of products and a secure operating environment.

8.5. The Operator takes all reasonable measures to prevent personal data breaches. If such breaches occur the Operator shall take appropriate actions will be consistent with the role of the Operator in relation to the products, services or processes affected by the breach.

## **9. Cookies Policy**

9.1. The Operator and its partners use cookies or similar technologies. Cookies are small text files that are stored on Your device and provide the Operator with the ability to track, store, and collect information.

9.2. The cookies may be used by the Operator for tracking your purchases of the Products in the Stores. When You purchase a Product, cookies provide the details for calculating the Cashback. The cookies may also be used to recognize that you have signed in to Your Personal Account so that you do not have to log into Your Personal Account for a period of time, to provide analytics and reporting and remember options you have selected for Your Personal Account settings.

9.3. You may control cookies at the browser level. If you disable cookies you might not receive Cashback from the Operator as the Operator will be unable to calculate the Cashback.

## **10. Your rights in respect of Your personal data**

10.1. The Operator takes all reasonable measures to ensure realization of Your rights in respect of Your personal data. At any time You may contact data protection officer of the Operator with a request for the realization of Your rights indicated herein. Contact details of the data protection officer are indicated in Section 12 hereof. Your request shall be executed not later than 1 (one) month from the receipt of Your request.

10.2. You may realize the following rights in respect to Your personal data upon Your request:

- (i) the right to access - You can ask for copies of your personal data;
- (ii) the right to rectification - You can ask the Operator to rectify inaccurate personal data and to complete incomplete personal data;
- (iii) the right to erasure - You can ask the Operator to delete your personal data;
- (iv) the right to restrict processing - You can ask use to restrict the processing of your personal data;
- (v) the right to object to processing - You can object to the processing of your personal data;
- (vi) the right to data portability - you can ask that the Operator transfers your personal data to another organization or to you;
- (vii) the right to complain to a supervisory authority - you can complain about our processing of your personal data; and
- (viii) the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

## **11. Amendments**

11.1. The Operator may update this policy from time to time by publishing a new version in the Application. You should check the Application occasionally to ensure you consent with any changes to this policy. If You disagree with any terms of this Privacy Policy, You must immediately cease to use the Application and notify the Operator of Your intention to stop the processing of Your personal data.

## 12. Contacts

You may contact the Operator by using the "Support" function of the Application interface.

You may contact data protection officer of the Operator on issues related to the processing of Your personal data:

Address: RA, 0001 Yerevan, Belyakov 5/22

Email address: [info@eqvilibria.com](mailto:info@eqvilibria.com)

Company name: EQVI LLC

Address: RA, 0001 Yerevan, Belyakov 5/22