

# SATIVA PRIVACY POLICY

## LIST OF CONTENTS

- I. Privacy Policy Application Terms
- II. Definitions
- III. Personal Data
- IV. Personal Data Processing
- V. Consent for personal data processing
- VI. GDPR compliance
- VII. Data transfer to third parties
- VIII. Use of Cookies
- IX. Integration with Facebook
- X. Use of Instagram

## PRIVACY POLICY APPLICATION TERMS

1. This Privacy Policy determines the terms for applying data protection procedures, data processing processes, as well as rules for disclosing confidential documents and sensitive data at SATIVA.
2. Personal data are processed at SATIVA according to 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).
3. We protect the privacy of our Users, Members, and Contractors to assure their security according to GDPR. The rules of Privacy Policy stated below touch upon protection and use of personal data to pursue cooperation with Users, Members, and Contractors.
4. SativaLife.eu Sp. z o.o., with its registered office in Kraków, ul. Jabłonna 9, 31-231 Kraków, entered in the Register of Entrepreneurs as number KRS 0000898591, VAT number (NIP) 9452244567, REGON 388835994, shall act as the Data Controller.
5. The data are provided on voluntary basis. All Users and Members shall have the right to view their personal data, update them, and to request data erasure. Nevertheless, data erasure may be related to temporary or complete termination of the cooperation.
6. Personal data gathered by SATIVA are gathered for legitimate purpose related to cooperation between the Parties, and the scope of data has been limited to the absolute minimum.

## II. DEFINITIONS

1. DATA CONTROLLER - SativaLife.eu Sp. z o.o., with its registered office in Kraków, ul. Jabłonna 9, 31-231 Kraków, entered in the Register of Entrepreneurs as number KRS 0000898591, VAT number (NIP) 9452244567, REGON 388835994.
2. COOKIES – text files saved on devices and in Internet services supported by SATIVA.

3. PERSONAL DATA – all information allowing identification of a natural person.
4. PRODUCT – good or service intended for sale, offered to Users and Members via SATIVA Online Store.
5. PERSONAL DATA PROCESSING – collection, storage, disclosure, and erasure of data referring to identification of a natural person or a corporate entity.
6. SERVICE(S) – website(s) supported by SATIVA operating under the domain of sativalife.eu and other domains related to SATIVA’s business.
7. SELLER / SERVICE PROVIDER – SativaLife.eu Sp. z o.o., with its registered office in Kraków, ul. Jabłonna 9, 31-231 Kraków, entered in the Register of Entrepreneurs as number KRS 0000898591, VAT number (NIP) 9452244567, REGON 388835994.
8. USER – corporate entity or natural person aged over 18, having full legal capacity and using functionalities made available at the sativalife.eu online store administered by SATIVA.
9. MEMBER - corporate entity or natural person aged over 18, having full legal capacity, who has entered into Agreement with SATIVA – pursuant to the submitted Declaration of Membership – and has approved Ethical Code, Membership Regulations, Online Store Regulations, and the Privacy Policy. Members can run their own business. Registered at MLM SATIVA System and has purchased products by oneself. Members shall have the right to gather Points, bonuses, and commissions, as well as Discounts, as stated in the Membership Regulations.

### III. PERSONAL DATA

1. Personal data, such as: User’s or Member’s ID number, correspondence address, e-mail address, phone number, etc. shall be treated as confidential. They can be used in relation to SATIVA’s business.
2. Personal data can be disclosed upon justified and legitimate request from Governmental Authorities. In the situation of disclosing the data to the authorities, the User or Member shall be informed by SATIVA about such circumstances.
3. SATIVA shall save and store personal data (ID number, full name, date of birth, residential address, correspondence address, e-mail address, phone number PESEL, tax/VAT number (NIP), bank account data) provided on voluntary basis by the User or Member, according to personal data protection regulations applicable in a given country.
4. SATIVA shall save and store personal data provided on voluntary basis to meet the contractual terms of the Agreement – concluded pursuant to the submitted Declaration of Membership – and to provide access to the Online Store, as necessary to make deliveries, financial settlements available to accountants, carriers, and other contractors performing services for SATIVA.
5. Third parties collaborating with SATIVA, having access to some personal data, will use the data to the extent necessary to perform the Agreement. Third parties are committed to using personal data according to the applicable laws.
6. Other than in the circumstances stipulated above, where personal data must be disclosed to third parties during the cooperation, procurement, and deliveries, User’s or Member’s personal data provided to SATIVA will not be disclosed to third parties without knowledge and consent of the User or Member.
7. After termination of membership in the MLM SATIVA system and SATIVA Online Store, including settlements, personal data kept by SATIVA shall be permanently erased and will not be processed further apart from the data still used under prior consents from the User or Member, or if their storage is necessary and legally required.
8. Users or Members shall have the right to obtain more information on one’s data storage, request rectification, blocking or erasure of one’s personal data; for this purpose, send a message with the relevant request at the e-mail address: [biuro@sativalife.eu](mailto:biuro@sativalife.eu).

## IV. PERSONAL DATA PROCESSING

1. SATIVA, acting as Data Controller, does not gather data associated with specific data of persons viewing websites, except for cases where registration and login are required to use such services.
2. Personal data are gathered by SATIVA Data Controller and processed using all services to the extent necessary to perform the Agreement – concluded pursuant to the submitted Declaration of Membership – and to access the Online Store, as existing between SATIVA and the corporate person or natural person being the data subject, and to fulfil legal obligations of SATIVA Data Controller.
3. Personal data are kept for the term of the Agreement and shall be erased after termination thereof except where the processing is necessary for the following purposes:
  - a. complaint and returns handling;
  - b. securing and pursuing any claims by SATIVA;
  - c. needs related to tax settlements;
  - d. legal requirements.
4. User or Member being the data subject shall have the right to:
  - a. access and view one's personal data;
  - b. request update and rectification of one's personal data;
  - c. request limitation or erasure of one's personal data.
5. To exercise one's rights, the User should address the relevant request at the correspondence address of the Data Controller: SativaLife.eu Sp. z o.o. ul. Jabłonna 9, 31-231 Kraków, or send a message with the relevant request at the e-mail address: [biuro@satalife.eu](mailto:biuro@satalife.eu).

## V. CONSENT FOR PERSONAL DATA PROCESSING

1. Users or Members give their consent to collection and processing of their personal data included in the Agreement – concluded pursuant to the submitted Declaration of Membership – and gathered while performing the Agreement and activities resulting therefrom, as the collection and processing of such data is necessary for SATIVA to pursue its duties under the Agreement and for direct marketing of products and services offered by the Data Controller, including:
  - a. sending commercial and marketing information to the User or Member, in various forms, via e-mail, text message, MMS, and access channels used by SATIVA or entities operating on request or on behalf of SATIVA.
2. Personal data processing occurs pursuant to the User's or Member's consent. The Data can be used by various branches of the Company involved in sales network management.

## VI. GDPR COMPLIANCE

1. SATIVA, as well as Users and Members, commit that the data gathered, used, processed, stored, and updated comply with applicable data protection laws, in particular including 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), and all other legal regulations on personal data protection.

## VII. DATA TRANSFER TO THIRD PARTIES

1. To assure correct performance of services related to cooperation between SATIVA as the Data Controller and the User and Member, the Data Controller shall have the right to disclose User personal data to third parties cooperating with SATIVA, in particular including:
  - a. companies supporting telecommunications systems;
  - b. companies dealing with post and courier mail services;
  - c. companies dealing with accountancy services;
  - d. other companies rendering services to SATIVA to the extent of current activities of the Data Controller;
  - e. Users and Members of the system within the same distribution structure can receive some data entered into the profile;
  - f. companies rendering payment services, hereinafter referred to as “payment services provider”.

## VIII. USE OF COOKIES

1. For the purpose of performing agreements and orders concluded between the Data Controller and the User or Member, SATIVA web services use Cookies being IT data that can be stored on User’s or Member’s devices.
2. Processing of data from Cookies is necessary for the purposes under legitimate interests pursued by SATIVA for marketing, statistical, and analytical purposes (Article 6(1)(f) of GDPR - General Data Protection Regulation of 27 April 2016 (Regulation (EU) 2016/679 of the European Parliament and of the Council)).
3. Cookies constitute a major element of website function. The main objective of cookies is to improve website use, as they affect:
  - ✓ User identification as the person logged into the online store;
  - ✓ remembering products added to the cart to place an order;
  - ✓ remembering products viewed, product categories, and products added to the cart to propose additional complementary offers;
  - ✓ remembering data from completed order forms, surveys, or logging data into our online store;
  - ✓ User account servicing at the online store;
  - ✓ adaptation of website content to user individual preferences and optimised use of the online store;
4. Cookies are saved in the browser and at the User’s drive, gathering personal data in the form of address: IP of User’s computer, and can only and exclusively be gathered to perform specific functions for the benefit of the User.
5. Standard software for website browsing permits cookie placement at the end device by default. Users may withdraw or changer the scope of one’s prior consent to the use of cookies on the website at any time, and decide to remove them by introducing specific changes to the browser settings. If you believe that cookies violate your privacy, you may block them at any time and remove the already gathered cookies in the browser log. Changes can be made for a specific website or generally for all your connections using the browser.

## IX. INTEGRATION WITH FACEBOOK

SATIVA website is integrated with functions and plugins of social media services (“plugins”), including plugins of Facebook Inc., 1601 Willow Road Menlo Park, CA 94025, USA (“Facebook”). Plugins of this service can be recognised by the Facebook logo on our website. When the User visits our website, Facebook shall receive information that the User has visited our website while using one’s IP address. By clicking on the plugin when the User is logged into one’s account on Facebook, the contents on

the website will be connected to the user profile on Facebook. As a result, Facebook may connect User's visit at our website with one's user account. The data are transferred regarding of the User's having an account on Facebook. SATIVA points out that as the website operator it has no control over the data collected and data processing, and is not aware of complete scope of data gathered purposes of data processing or their storage periods. Facebook saves the data gathered about the user as user profile, and uses them for advertising purposes, market research and/or shaping its website according to the needs. The analysis is performed, in particular, for the purpose of informing other Facebook users about User activity on our website. Users shall have the right to object against creation of such user profiles. To exercise this right, the User must address Facebook. Via the Facebook plugin, the Data Controller allows the User to cooperate with the social media service and other users, owing to which the Data Controller may improve its offer and make it more interesting. The legal grounds for using the Facebook plugin are formed by Article 6(1) paragraph one of point (f) of GDPR. We recommend to always log out after using Facebook, particularly to avoid the aforementioned allocation of User activity in the Internet to one's profile. More information about the purpose and scope of data collection and processing by Facebook can be found in Facebook privacy policy available at the address: <http://www.facebook.com/policy.php>

## USE OF INSTAGRAM

SATIVA website is integrated with functions and plugins of Instagram service supported by Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA ("Instagram"). They can be recognised by the Instagram logo on our website. When the Users are logged into their account on Instagram, they may allocate Data Controller's contents to one's user account by linking them and placing hashtags. In this way, the Data Controller receives information and user activity analyses on Instagram from Instagram. The Data Controller uses such information to improve its offer. The Data Controller has no control over User data processing and use by Instagram; more information about the Instagram privacy policy can be found at the address <http://instagram.com/about/legal/privacy/>. Instagram saves the data gathered about the user as user profile, and uses them for advertising purposes, market research and/or shaping its website according to the needs. The analysis is performed, in particular, for the purpose of informing other Instagram users about User activity. Via the Instagram plugin, the Data Controller allows the User to cooperate with the social media service and other users, owing to which the Data Controller may improve its offer and make it more interesting.

---