

## Privacy Policy (Privacy Notice)

Date of last update: 14.07.2024

Welcome to LIKI24: <https://liki24.es>!

### 1. LIKI24 AND THE PRIVACY POLICY

This Privacy Policy, (hereinafter, the "**Privacy Policy**" or "**Privacy Notice**") governs how we collect, use, share and process your information, that you provide to us by using the webpage <https://liki24.es> ("**Website**"), the mobile application ("**App**") and other related software (hereinafter jointly referred to as the "**Platform**" or "**LIKI24 Platform**") of the company FAMCARE TECHNOLOGIES S.R.L, (hereinafter referred to as "**LIKI24**"), with the domain <https://liki24.es>, the related mobile application and other related software.

We, LIKI24, are acting as Controller in accordance with the provisions of the applicable data protection legislation. Our identification details are the following: **FAMCARE TECHNOLOGIES S.R.L**, having the headquarter in Bucharest, 2 District, 158 Calea Mosilor Street, Bucharest, Trade Register no. J40/20885/2021, Fiscal Code 45287030, DPO: SCA DUMITRACHE-CHIRONDA, IVU SI ASOCIATII, contact: [dpo@liki24.ro](mailto:dpo@liki24.ro).

Protecting your personal data is very important to us. To do this, we undertake to provide all due diligence to ensure compliance with the legal requirements for the protection of personal data, in particular the requirements provided by General Data Protection Regulation (EU) 2016/679 (GDPR).

Based on this Privacy Notice, we help you understand how we process your personal data within our Platform and during the provision of the services, what categories of information we process, why we process them, how long we keep them, who can access this data, your rights and how you can exercise them.

This Privacy Policy applies to the LIKI24 Platform. Terms used and not directly defined herein are defined in the T&C.

Please read this Privacy Policy carefully. It includes information about the services, your rights, and other important information.

By viewing the Website, using the App and/or our services you accept this Privacy Policy and confirm that you voluntarily provide us with personal data, including product orders and financial information, and consent to their collection, use and disclosure in accordance with this Privacy Policy.

You also confirm that you are duly authorized by any third-party whose personal data you share with us. We shall act as per your representation of authority and shall not make any independent inquiries to ascertain the veracity of your authorization. In the event that you do not have sufficient authorization, you shall be solely responsible for your acts and omissions including sharing of personal data with us by you and the consequential processing and actions taken by us in accordance with this Privacy Policy.

### 2. TYPES OF COLLECTED AND PROCESSED PERSONAL DATA

We collect your personal data to provide and continually improve our services. Below are the types of personal data we may collect.

#### 2.1. Provided by the User

We receive and store from you any information you submit to us that is relevant to the provision of services defined in the T&C. You can choose not to provide certain information but then you might not be able to order the services, as this information might be required to provide you with the

services that you request.

- a. Primary identification data and contact details: name, surname, phone number, delivery address, e-mail;
- b. Other information required for the provision of the services: voice recording, other people delivery locations or phone numbers, etc.

Please do not provide to us or share by any means on our Platform any health information regarding yourself or other people.

## **2.2. Automatically collected**

We automatically collect and store certain types of information about your use of the services, including your interaction with the Platform. We use cookies and other unique identifiers, and we obtain certain types of information when your web browser or device accesses the Platform.

- a. Account data: IP address, geolocation data, chosen payment method (bank card token and mask), language preferences, information about requested products, products viewed, preferences, shopping history, shopping frequency.
- b. Device data and Platform interaction data: device ID (such as IDFA and IDFV), browser info, device info, mobile carrier info, usage data (e.g., time spent on various pages of the Platform), diagnostics data, marketing data or any other information about how you interact with the Platform.
- c. If the registration of the User account is performed with the use of external services (e.g., Facebook or Google account): public profile data made public by the services through which you log in: username, e-mail address;
- d. Additional information:
  - i. version and time zone settings;
  - ii. purchase and content use history, which we sometimes aggregate with similar information from other users to create features;
  - iii. Platform browsing history and preferences;
  - iv. the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); cookie number; products and/or content you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs);
  - v. phone numbers used to communicate with our customer service;
  - vi. data resulting from the management of incidents and claims: if the user contacts LIKI24 through the order form or on the phone number, LIKI24 will collect the messages received in the format used by the User and may use and store them to manage current incidents and claims;
  - vii. data arising from "cookies": LIKI24 uses its own and third-party cookies to facilitate browsing by its Users for comfort, statistics and marketing purposes;
  - viii. technical information for fraud prevention purposes.

## **3. PURPOSES OF PERSONAL DATA COLLECTION AND PROCESSING**

We process your personal data to operate, provide and improve the services offered through the Platform. We may process your personal data to:

- a. Intermediate and provide the services. We use your data to process the order, to redirect the order to the Delivery Agents and the Retailers in order to deliver the LIKI24 Services, intermediate provision of other services and sales of products, provide customer service, process payments and communicate with you about orders, products, services and promotional offers.
- b. Troubleshoot and improve LIKI24 Services. We use your data to provide functionality, analyze

- performance, fix errors and improve the usability and effectiveness of the LIKI24 Services.
- c. Personalize your experience. We use your personal data to recommend features, products and services that might be of interest to you, identify your preferences and personalize your experience with LIKI24 Services.
  - d. Comply with legal obligations, bring forth and defend against legal actions. In certain cases, we collect and use your personal data to comply with laws. For instance, we collect information regarding place of establishment and limited bank account information for identity verification and other purposes.
  - e. Communicate with you. We use your personal data to communicate with you in relation to the services via different channels (e.g., by phone, email, in-app notices, push notifications, etc.).
  - f. Prevent fraud and credit risks. We process personal data to prevent and detect fraud and abuse in order to protect our security, the security of our Users, partners and others.
  - g. Communicate. We will communicate with you via technical communication means (telephone, e-mail, text messages, chat, application notifications, web page communications, etc.) through LIKI24 Customer Service. Please refer to Section 8 of the T&C for details.
  - h. Inform you of products and services. We may use your personal data to display interest-based ads for features, non-medical products and non-medical services that might be of interest to you, as well as for promotion and commercial offers (online and offline) of non-medical products and services. We may use third-party technology integrated in Platform for the purpose of collecting the Users' data and preferences and using this with CRM systems and advanced technology for the benefit of users. The data will be processed for transmission: the User may receive messages (e.g., e-mails, text, in-app notices, push notifications) with promotions and/or offers relating to the non-medical products and services that may be of interest to the User. LIKI24 may personalize such advertising in accordance with the Users' preferences. If the User does not wish to receive this information and/or commercial communications, he/she may at any time opt to "Unsubscribe", and LIKI24 will immediately stop sending the aforementioned information.

LIKI24 and/or third parties associated with LIKI24 may use the order delivery address entered by the User for the purpose of carrying out promotional activities for the delivery of samples or free products of the service related to LIKI24 which may be of interest to the user (e.g., home delivery of free samples or advertising brochures) at the same time as delivering the order.

As a result of using the LIKI24 Platform, the User may also receive commercial communications from third parties associated with the Platform, such as Facebook and Google, all this in accordance with the privacy preferences set by each User on the third-parties' platforms.

The users may at any time unsubscribe from online non-medical marketing services or close their accounts if they do not wish to receive the relevant information by simply sending an email to [support@liki24.es](mailto:support@liki24.es).

- i. Ensure security and an appropriate environment for the safe supply of services. LIKI24 may use the data in order to ensure the proper use of the services requested on its Platform (e.g., to ensure the delivery is made to persons over the age of 18).
- j. Process incidents and claims. If the User contacts LIKI24 to report the occurrence of any damage, unforeseen event or any other issue, LIKI24 may process all data relating to the incident for the purpose of handling and responding to requests.
- k. Reach other purposes for which we seek your consent. We may also ask for your consent to process your personal data for a specific purpose that we communicate to you. When you consent to our processing of your personal information for a specified purpose, you may withdraw your consent at any time and we will stop the processing of your data for that purpose.

#### **4. COOKIES AND THIRD-PARTY TECHNOLOGIES**

We use cookies and other identification technologies on our apps, websites, e-mails for purposes described in this Privacy Notice and our Cookies Policy.

Cookies are small text files that are stored on browsers or devices by websites, apps, online media. LIKI24 uses cookies and similar technologies for purposes such as authenticating users, remembering users' preferences and settings, determining the popularity of the content, delivering and measuring the effectiveness of marketing campaigns, analyzing Platform traffic and trends, and generally understanding the online behaviors and interests of people who interact with the services offered on the Platform.

We may also allow other companies to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet and track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify the devices used by visitors to our Platform, as well as when they visit other online sites and services.

#### **5. PERSONAL DATA SHARING AND DISCLOSURE**

The representation services (purchase of the ordered products on your behalf) and delivery services require that we share your personal data with Delivery Agents and other Third-Party Providers (postal mail offices, delivery companies, Retailers).

We may also share such data with our affiliates, subsidiaries and partners, for legal reasons or for intra-group services.

We employ other companies in processing payments, transmitting content, assessing and managing credit risk, legal services, accounting services, etc.

These third-party service providers have access to personal information needed to perform their functions but may not use it for other purposes. Further, they must process the personal information in accordance with this Privacy Policy and as permitted by applicable data protection laws.

We may share your data for legal reasons or in the event of a dispute. We may share the Users' personal data if we believe it's required by applicable law, regulation, operating license or agreement, legal process and/or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

If LIKI24 becomes a party to a merger/acquisition transaction, user information might be transferred as a business asset, but it shall remain subject to the safeguards made in any pre-existing Privacy Policy (unless the user consents otherwise).

Whenever we transfer personal data to countries outside of the European Economic Area, we ensure that the information is transferred in accordance with this Privacy Policy and as permitted by the applicable laws on data protection. We rely on European Commission adequacy decisions or use contracts with standard safeguards published by the European Commission and similar measures under Italian/Portuguese laws for such transfers.

#### **6. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING**

The legal grounds for processing of personal data are:

- a. the legal obligations incumbent on LIKI24 as a result of the services provided through the LIKI24 Platform;
- b. the conclusion or execution of the contract (by accepting the T&C) regarding the LIKI24 Services;
- c. the legitimate interest of LIKI24 in promoting its products and/or services in the context

- of their presentation through the LIKI24 Platform or in defending its rights and interests in the event of potential legal action;
- d. your consent to direct marketing activities and other processing for which consent is required by law. If the basis of processing is your consent, to the extent that you have given your consent you have the right to withdraw your consent at any time, without prejudice to the lawfulness of the processing carried out by LIKI24 prior to its withdrawal.

## **7. DATA RETENTION PERIOD**

Personal data is stored for processing for the time necessary to achieve the purposes of the processing mentioned in this Privacy Policy and beyond, in accordance with the legal requirements for archiving documents.

The data necessary for accounting will be kept for the periods provided by the applicable legislation for document management, archiving, and accounting obligations, for a period of no more than 10 years from the end of the financial year when it was collected.

We will not store your data for longer than is necessary for each processing and we will process it strictly according to the legal provisions in force.

The data provided on the basis of your consent is kept until the purpose for which it was given or until the consent is withdrawn and may be retained if it is the legitimate interest of LIKI24 during the limitation period related to this data processing. Certain categories of personal data may be processed by LIKI24 for a longer time in view of the applicable legal obligations, namely our legitimate interests (such as the protection of rights or interests, the handling of any requests). We shall keep documents containing personal data for a longer period if required by law, for any current or future legal proceedings or to establish, enforce or defend our rights before courts and beyond.

If you wish to disable/delete the account, LIKI24 will consider that such a request would reasonably imply the deletion of the account data. Disabling/deleting the account does not involve the withdrawal of the user's consent to the processing of data for the direct marketing of products, such consent being expressed separately by the subscribing procedure. In this context, the User shall unsubscribe separately or send a request to our e-mail: [support@liki24.es](mailto:support@liki24.es). Within a maximum of one month from the date of registration of the request, LIKI24 will communicate to the user how to resolve the request unless the legal response period is extended by law. When the user requests to disable/delete the account, but there is at least one active order on that account, the account deletion request can only be registered after the delivery of the products and completion of the last active order.

## **8. SECURITY MEASURES**

LIKI24 believes that the security of your personal data is of the utmost importance and, in this regard, ensures the implementation and periodic review of organizational and technical security measures designed to protect your data against unauthorized access, modification, disclosure or destruction.

Access to your personal data is only allowed to persons authorized by LIKI24, following an appropriate assessment, according to specific attributions and responsibilities, and if the respective persons previously accepted their confidentiality obligations.

LIKI24 has taken the necessary steps according to the GDPR to maintain the required security level, according to the nature of the personal data processed and the circumstances of the processing, to avoid, to the extent possible and always in accordance with the state of the art, its alteration, loss or unauthorized access or processing.

The LIKI24 implements specific precaution measures and procedures for the proper prevention, identification and management of potential personal data breaches, under the conditions set forth by

the legal provisions in force.

The servers we use to store the data are located in EU.

## **9. YOUR RIGHTS**

You can exercise at any time the following rights, within the limits and conditions set forth by the applicable legislation in the field of personal data protection:

- a. Right to be informed
- b. Right of access to your data
- c. Right to data rectification
- d. Right to object to data processing
- e. Right to data restriction
- f. Right to data erasure
- g. Right to data portability
- h. Right not to be subject to a decision based solely on automated processing
- i. Right to withdraw your consent

All these rights can be exercised by submitting to us (to the contact details listed below) an official written request in this regard and we will respond you within 30 days or, if the request requires a more complex analysis, this deadline may be extended by another 60 days, in which case you will be informed of the reason for the extension accordingly.

If you are convinced that your personal data is being processed incorrectly and does not comply with the legal requirements, you may file a complaint with you local supervisory authority for personal data processing.

Our business changes constantly and our Privacy Policy will change also. Please check our Platform frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.

We shall never materially change our policies and practices to make them less protective of the User information collected in the past without the consent of affected Users.

For any further assistance, details or information we remain at your disposal. The processing of personal data is monitored and supervised by the Data Protection Officer, having the following contact details: [dpo@liki24.ro](mailto:dpo@liki24.ro)