

# PRIVACY POLICY

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## **1 INTRODUCTION**

We are delighted that you have shown interest in the services of Natural Form owned and operated by Non Zero Design LLP (hereinafter referred to as "Non Zero", "we", "us", "our") and any services which are provided via <http://naturalform.shop/> website, software(s), APIs, or otherwise and mobile website and mobile applications related, linked, or otherwise connected thereto (collectively the "Platform"). Data protection is high priority for Non Zero. The use of the Platform of Non Zero is possible without any indication of personal data; however, if a data subject wants to use special services via our Platform, processing of personal data may become necessary. If the processing of personal data is necessary, and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, email address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA) and in accordance with the country-specific data protection regulations applicable to Non Zero. Utilizing this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed through this data protection declaration, of the rights to which they are entitled.

As the controller, Non Zero has implemented numerous technical and organizational measures to ensure the complete protection of personal data processed through this Platform. However, Internet-based data transmissions may, in principle, have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

## **2 DEFINITIONS**

The data protection declaration of Non Zero is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used. In this data protection declaration, we use, among other things, the following terms:

### **A) Personal data**

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### **B) Data subject**

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

### **C) Processing**

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **D) Restriction of processing**

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

### **E) Profiling**

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

F) Pseudonymization

Pseudonymization is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

G) Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

H) Processor

Processor is a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

I) Recipient

Recipient is a natural or legal person, public authority, agency, or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by

those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

J) Third-party

Third-party is a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

K) Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

### **3 NAME AND ADDRESS OF THE CONTROLLER**

Controller for the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Non Zero Design LLP

Enam Sambhav, BKC WeWork Enam Sambhav, C - 20, G Block Rd, G Block BKC, Bandra Kurla Complex, Bandra East, Mumbai, Maharashtra 400051

[hello@nonzero.space](mailto:hello@nonzero.space)

### **4 COOKIES**

The Platform of Non Zero uses cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Platform and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of

the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, Non Zero can provide the users of this Platform with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our Platform can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our Platform users. The purpose of this recognition is to make it easier for users to utilize our Platform. The Platform user that uses cookies, e.g. does not have to enter access data each time the Platform is accessed, because this is taken over by the Platform, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

The data subject may, at any time, prevent the setting of cookies through our Platform employing a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our Platform may be entirely usable. The Platform uses the following cookies:

Cookies	Domain	Description	Expiry	Type
keep_alive	naturalform.shop	The keep_alive cookie is used to maintain a user's session active on a website,	1 hour	Necessary

		preventing automatic logout during periods of inactivity.		
secure_customer_sig	.naturalform.shop	Shopify sets this cookie to be used in connection with customer login.	1 year	Necessary
localization	.naturalform.shop	The localization cookie stores user preferences for language and region to provide a personalized browsing experience.	1 year	Necessary
_shopify_y	.naturalform.shop	This cookie is associated with Shopify's analytics suite.	1 year	Analytics
_shopify_s	.naturalform.shop	This cookie is associated with Shopify's analytics suite.	1 hour	Analytics
_tracking_consent	.naturalform.shop	Shopify sets this cookie to store a user's preferences if a merchant has set up privacy rules in the	1 year	Necessary

		visitor's region.		
_orig_referrer	.naturalform.shop	Shopify sets this cookie to be used in connection with shopping cart.	14 days	Analytics
_landing_page	.naturalform.shop	Shopify installs this cookie to track landing pages.	14 days	Analytics
_shopify_sa_t	.naturalform.shop	Shopify sets this cookie for marketing & referrals.	1 hour	Analytics
_shopify_sa_p	.naturalform.shop	Shopify sets this cookie for marketing & referrals.	1 hour	Analytics
ga*	.naturalform.shop	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days	Analytics
_ga	.naturalform.shop	The _ga cookie, installed by Google Analytics, calculates visitor, session, and campaign data and also keeps track of site usage for the site's analytics	1 year 1 month 4 days	Analytics

		report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.		
getItem	naturalform.shopp	This cookie is related to local storage functions, likely used for retrieving stored data from the browser.	never	Other
setItem	naturalform.shopp	This cookie is related to local storage functions, likely used for saving user preferences or session data.	never	Other
removeItem	naturalform.shopp	This cookie is related to local storage functions, likely used for deleting stored data.	never	Other
clear	naturalform.shopp	This cookie is related to local storage functions, likely used for clearing stored data.	never	Other

length	naturalform.shopp	This cookie is related to local storage functions, likely used for determining the number of stored items.	never	Other
key	naturalform.shopp	This cookie is related to local storage functions, likely used for retrieving a specific key from stored data.	never	Other

## 5 COLLECTION OF GENERAL DATA AND INFORMATION

The Platform collects a series of general data and information when a data subject or automated system calls up the Platform. The general data collected may be (1) Full names, (2) Organisation name, (3) Emails, (4) (5) Data and information that may be used in the event of attacks on our information technology systems.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

When using these general data and information, Non Zero does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our Platform correctly, (2) optimize the content of our Platform as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, (4) for analytics purposes, (5) to facilitate account creation and logon process, (6) request feedback (7) as necessary for basic functionality of the Platform

and account management (billing our clients) and, (8) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Non Zero analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise and to achieve an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

## **6 CONTACT POSSIBILITY VIA THE PLATFORM**

The Platform of Non Zero contains information that enables quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (email address). If a data subject contacts the controller by email or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

## **7 CCPA PROVISIO**

The California Code of Regulations defines a "resident" as:

- 7.1 every individual who is in the State of California for other than a temporary or transitory purpose and
- 7.2 every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, certain rights and obligations apply regarding your personal information.

if you are a resident of California, you are granted specific rights regarding access to your personal information.

## **Your California Privacy Rights**

If you are a California resident, you have the following rights specifically under the California Consumer Privacy Act:

**Right to Know.** You have the right to know and see what data we have collected about you over the past 12 months, including:

- (1) The categories of personal information we have collected about you;
- (2) The categories of sources from which the personal information is collected;
- (3) The business or commercial purpose for collecting your personal information;
- (4) The categories of third parties with whom we have shared your personal information; and
- (5) The specific pieces of personal information we have collected about you.

**Right to Delete.** You have the right to request that we delete the personal information we have collected from you (and direct our service providers to do the same).

If you are under 18 years of age, reside in California, and have a registered account with the Platform, you have the right to request removal of unwanted data that you publicly post on the Platform. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Platform, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

**Other Rights.** California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third

parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided in this document.

Certain information may be exempt from such requests under applicable law. For example, we need certain types of information so that we can provide the Platform to you. If you ask us to delete it, you may no longer be able to access or use the Platform.

To exercise your rights under the California Consumer Privacy Act, please contact us by either sending us an e-mail at [hello@nonzero.space](mailto:hello@nonzero.space). Please provide your full name and e-mail address so that we may respond to your request as quickly as possible. You may be required to verify your identity before we fulfill your request. To do so, you will need to provide us with certain account information, such as your full name and email address. You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization for the agent to act on your behalf. You will still need to verify your identity directly with us.

## **8 SECURITY**

This Platform ensures that data is encrypted when leaving the Platform. This process involves the converting of information or data into a code to prevent unauthorised access. This Platform follows this process and employs secure methods to ensure the protection of all credit and debit card transactions. Encryption methods such as SSL are utilised to protect customer data when in transit to and from this Platform over a secure communications channel.

Whilst we do everything within our power to ensure that personal data is protected at all times from our Platform, we cannot guarantee the security and integrity of the information that has been transmitted to our Platform.

## **9 ROUTINE ERASURE AND BLOCKING OF PERSONAL DATA**

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

## **10 RIGHTS OF THE DATA SUBJECT**

### **A) Right of confirmation**

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact us.

### **B) Right of access**

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing; the existence of the right to file a complaint

with a supervisory authority; where the personal data are not collected from the data subject, any available information as to their source; the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or an international organization. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may at any time contact us.

#### C) Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact us.

#### D) Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.

The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

The data subject objects to the processing in accordance with Article 21(1) of the GDPR, and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.

The personal data have been unlawfully processed.

The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Non Zero, he or she may at any time contact our us. Non Zero shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. Non Zero will arrange the necessary measures in individual cases.

#### E) Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.

The processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead.

The controller no longer needs the personal data for the processing, but they are required by the data subject for the establishment, exercise or Defense of legal claims.

The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the conditions as mentioned above is met, and a data subject wishes to request the restriction of the processing of personal data stored by Non Zero, he or she may at any time contact us. Non Zero will arrange the restriction of the processing.

#### F) Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used, and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided. As long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where

technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact Non Zero.

#### G) Right to object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

Non Zero shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or Defense of legal claims.

If Non Zero processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to Non Zero to the processing for direct marketing purposes, Non Zero will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by Non Zero for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may directly contact Non Zero. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive

2002/58/EC, to use his or her right to object by automated means using technical specifications.

#### H) Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, Non Zero shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may at any time directly contact Non Zero.

#### I) Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to the processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may at any time directly contact Non Zero.

## **11 DATA PROTECTION PROVISIONS – GOOGLE SEARCH CONSOLE (GSC)**

The controller has integrated Google Search Console (“GSC”). GSC is a free service provided by Google that enables website owners to monitor, maintain, and troubleshoot their site’s presence in Google Search results. GSC delivers aggregated performance metrics—such as search impressions, click data, average ranking positions, indexing status, and crawl error reports—that assist us in evaluating and enhancing our website’s visibility and content strategy. GSC collects data directly from Google’s search index without deploying additional tracking technologies (e.g., cookies) on our website; as a result, no personal data of our visitors is processed by us via GSC.

We use GSC on our Platform to review the following key performance indicators:

- Search impressions and click data
- Average ranking positions for relevant search queries
- Indexing status and detection of crawl errors
- Mobile usability and security issues

For further details regarding the privacy practices applicable to GSC, please consult Google’s Privacy Policy at [https://policies.google.com/privacy?hl=en\\_GB](https://policies.google.com/privacy?hl=en_GB) and the associated terms of use available through Google’s service platforms.

## **12 DATA PROTECTION PROVISIONS ABOUT THE APPLICATION AND USE OF GOOGLE ANALYTICS (WITH ANONYMIZATION FUNCTION)**

On this Platform, the controller has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come

(the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

For the web analytics through Google Analytics, the controller uses the application “\_gat. \_anonymizeIp”. By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymized when accessing our Platform from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the traffic on our Platform. Google uses the collected data and information, among other things, to evaluate the use of our Platform and to provide online reports, which show the activities on our Platform, and to provide other services concerning the use of our Platform for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyse the use of our Platform. With each call-up to one of the individual pages of this Platform, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our Platform by the data subject. With each visit to our Platform, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our Platform at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this Platform, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript that any data and information about the visits of Platform may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

### **13 DATA PROTECTION PROVISIONS ABOUT THE APPLICATION AND USE OF MICROSOFT CLARITY**

On this Platform, the controller has integrated Microsoft Clarity (“Clarity”). Clarity is a free service provided by Microsoft that enables website owners to gain detailed insights into user behavior through tools such as heat maps, session recordings, and aggregated performance metrics. Clarity captures anonymized interaction data—including mouse movements, clicks, scroll patterns, and page engagement—to help us analyze visitor behavior and optimize our website’s usability without directly processing personally identifiable information.

Clarity’s tracking code, which is embedded on our Platform, operates via first-party cookies that facilitate session continuity and enable the aggregation of usage statistics. Importantly, no personal data is directly collected by Clarity unless explicitly configured to do so. Data gathered by Clarity is transmitted to and processed by Microsoft Ireland Operations Ltd. and stored securely on Microsoft’s Azure platform. Any deactivation measures or user consent preferences implemented on our website—such as cookie opt-in or opt-out settings—are respected by Clarity.

For further details regarding the data processing practices, security measures, and your rights in relation to Clarity, please refer to Microsoft’s Privacy Statement at <https://privacy.microsoft.com/en-us/privacystatement> and the Clarity privacy information available at <https://clarity.microsoft.com/privacy>.

#### **14 PAYMENT METHOD: DATA PROTECTION PROVISIONS ABOUT THE USE OF RAZORPAY AS A PAYMENT PROCESSOR**

On the Platform, the controller has used Razorpay as an online service provider. Payments are processed via Razorpay and the data is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS) when processing payment.

The operator of the Razorpay component is Razorpay Software Private Limited, No. 22, 1st Floor, SJR Cyber, Laskar - Hosur Road, Adugodi, Bangalore.

If the data subject chooses "Razorpay" as the payment option in the online shop during the ordering process, we automatically transmit the data of the data subject to Razorpay. By selecting this payment option, the data subject agrees to the transfer of personal data required for payment processing.

The personal data transmitted to Razorpay is usually first name, last name, address, email address, IP address, telephone number, mobile phone number, or other data necessary for payment processing. The processing of the purchase contract also requires such personal data, which are in connection with the respective order.

The transmission of the data is aimed at payment processing and fraud prevention. The controller will transfer personal data to Razorpay, in particular, if a legitimate interest in the transmission is given.

Razorpay will, if necessary, pass on personal data to affiliates and service providers or subcontractors to the extent that this is necessary to fulfil contractual obligations or for data to be processed in the order.

The data subject has the possibility to revoke consent for the handling of personal data at any time from Razorpay. A revocation shall not have any effect on personal data which must be processed, used or transmitted in accordance with (contractual) payment processing.

The applicable data protection provisions of Razorpay may be retrieved under <https://razorpay.com/privacy/>.

## **15 DATA PROTECTION PROVISIONS OF THE SERVICE PROVIDER SHOPIFY**

Shopify is the data processor of our Platform. Shopify may place cookies on our Platform to collect and process user data of end users.

The Platform uses the shop system of the service provider Shopify International Limited, Victoria Buildings, 2nd floor, 1-2 Haddington Road, Dublin 4, D04 XN32, Ireland ("Shopify"), for the purpose of hosting and displaying the online shop on the basis of processing on our instructions. All data collected on our Site is processed on Shopify's servers. Within the scope of the aforementioned Shopify services, data may also be transferred to Shopify Inc., 150 Elgin St, Ottawa, ON K2P 1L4, Canada, Shopify Data Processing (USA) Inc., Shopify Payments (USA) Inc. or Shopify (USA) Inc. for further processing on our behalf. In the event that data is transferred to Shopify Inc. in Canada, the appropriate level of data protection is guaranteed by an adequacy decision of the European Commission. Shopify Data Processing (USA) Inc., Shopify Payments (USA) Inc. and Shopify (USA) Inc. based in the USA are certified for the US-European data protection agreement "Privacy Shield", which guarantees compliance with the data protection level applicable in the EU.

For more information on Shopify's privacy policy, please visit the following website: <https://www.shopify.com/legal/privacy>

## **16 LEGAL BASIS FOR THE PROCESSING**

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same

applies to such processing operations which are necessary for carrying out pre-contractual measures, for example, in the case of inquiries concerning our services. If we are subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or another natural person. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

#### **17 THE LEGITIMATE INTERESTS PURSUED BY THE CONTROLLER OR BY A THIRD PARTY**

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to contact you and provide our services.

#### **18 PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED**

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract. If the data subject requests for termination or terminates his Account, the personal data shall be retained for a period of 1 year from date of termination.

**19 PROVISION OF PERSONAL DATA AS STATUTORY OR CONTRACTUAL REQUIREMENT; REQUIREMENT NECESSARY TO ENTER INTO A CONTRACT; OBLIGATION OF THE DATA SUBJECT TO PROVIDE THE PERSONAL DATA; POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE SUCH DATA**

We clarify that the provision of personal data may be partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when we sign a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact us. We will clarify to the data subject whether the provision of the personal data is required by law, contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.