

# Privacy Policy and information about the processing of your personal data for you who are a Zinzino Independent Partner

## 1. What is a Privacy Policy?

1.1. In our privacy policy, we explain who is responsible for the processing of personal data that occurs when you order goods or services from us. We also describe which elements of personal data about you is being processed when you provide information to us in various situations, how we process personal data, why we do so, and what legal support we rely on to justify the processing, as well as explaining which third parties may be processing your personal data about you so that we will be able to provide the goods and services you have ordered. You also receive information about your rights concerning our processing of your personal data, and how to proceed in order to exercise your rights.

## 2. Important terms and concepts

2.1. Here are some important terms and concepts that may be helpful to gain a fuller understanding our privacy policy:

- a) “Personal Data” means any information relating to an identified or identifiable natural person. An identifiable natural person is an individual who can be identified directly or indirectly with reference to an element of data, for instance name, an identification number such as a Swedish personal ID number, information about location, online identifiers such as an IP address, or one or more factors specific to the physical, physiological, genetic, psychological, financial, cultural or social identity of the individual.
- b) “Processing” means a measure or combination of measure concerning personal data, such as the collection, registration, organising, structuring, storage, adaptation or modification, production, reading, usage, disclosure by transfer, dissemination or provision by other means, adjustment or compilation, limitation, erasure or destruction.
- c) “Zinzino Independent Partner” means a person or company who is registered at Zinzino as a reseller of Zinzino’s products.

## 3. Who is responsible for the processing?

- 3.1. *Zinzino Sverige AB* is the data controller in relation to the processing. In this text, *Zinzino Sverige AB* is referred to as “We” and those who are a physical person who is, or will become, a Zinzino Independent Partner is referred to as “You.”
- 3.2. If the partner agreement is entered into with a company, the company is responsible for its personal data processing and for the legality of the transfer of personal data about contact persons and users to Zinzino. Zinzino only has responsibility for the personal data processing occurring at Zinzino.

## 4. Generally about our processing of personal data

4.1. We will only process the personal data about you that is necessary for the purposes as specified in Section 5 below. In addition, we have procedures for how we store and remove identifying information from personal data in order to continuously ensure that your personal data is sufficient and relevant at all times.

### *Where the data is obtained from*

- 4.2. The information is obtained directly from you via the information you provide to us when you register as a Zinzino Independent Partner and the information you enter or upload on our website at a later date. In addition, we process information about your generated sales that have occurred with us in connection with that customers or other Zinzino Independent Partners order goods and/or services from us.
- 4.3. You will need to provide the information we request for the partner agreement in order to be able to become Zinzino Independent Partner. Therefore, providing the information we request is necessary so that we will be able to enter into an agreement with you.

## 5. Which personal data we process about you and the reasons for the processing, and related matters

### *We process personal data in order to manage the partnership and in order to be able to provide a statement of account for points and commissions*

5.1. When you register as a Zinzino Independent Partner, you enter into an agreement with us. Therefore we will process all of the personal data you provide to us in connection with placing the registration, or what you provide to us at a later date, such as your name, civil registration number, address, e-mail address and

telephone numbers, and the details of how you contacted us, such as IP address, in order to fulfil the obligations of the agreement with you – also in order to process your partner agreement and/or your subscription, deliver goods and services to you that have been ordered, manage the payment for them, and deal with and fulfil any guarantee commitments in respect of the goods you purchase under the Personal Data Protection Bill 2019.. These types of personal data provided to us within the framework of the partner agreement or upon orders, we call for “Partner Data” and “Ordering Data.”

- 5.2. The Ordering Data we collect so that we can process and otherwise deal with your orders will be processed in order to fulfil the agreement with you during the time your business relationship with us remains in effect, and during the time period for any warranty commitments on our part.
- 5.3. The Partner Data we collect will be processed as long as you are a Zinzino Independent Partner plus until we have reported all commissions or other benefits you may be entitled to according to the Partner Agreement; this is in order for us to be able to fulfil our agreement with you.
- 5.4. Your Partner Data will also be processed as long as any other Zinzino Independent Partner is entitled to a commission or points based on the sales to you and to the customers you have recruited, as well as to those customers who otherwise have chosen to be affiliated with you as a Zinzino Independent Partner. In these cases, the support for the processing of the data is based on a balancing of interests, where the legitimate interest that makes the processing permissible is Zinzino’s obligation to fulfil our reporting obligation being weighed against the interests of the Zinzino Independent Partners who are affected.

*We process personal data when others use our website*

- 5.5. When using our website, we will automatically collect and process technical information including IP address, login information, type and version of operating system and device, time settings, selected language, cookies, time expended for planning orders, keystrokes, etc. These types of personal data that is provided in connection with using our website we refer to as “User Data.”
- 5.6. Your User Data is processed in order to provide you with sign in rights and use your user account on our website, ensure your identity, have accurate and up-to-date information about you, so that you will be able to track and manage your orders in process, to manage your choices in regards to settings and payment details, to assist with further developing and improving our website and the IT systems used to provide it, as well as to be able to deliver the goods and services to you that you have ordered, in accordance with our General Terms and Conditions. The User Data about you we have collected will be saved for the same period of time as the Partner Data about you we process about you we process under the Personal Data Protection Bill 2019.

*We process personal data to make your membership in the Zinzino4 Free Program possible*

- 5.7. We also process your personal data and information about what you have ordered and paid, in order to manage your membership in the “Zinzino4Free” programme.
- 5.8. The personal data processed within the framework of the “Zinzino4Free” programme is processed for as long as you choose to remain as a member of the “Zinzino4Free” programme is, for the purpose of fulfilling our membership agreement.

*We process personal data in order to be able to market our goods and services to you*

- 5.9. Finally, we process your personal data for marketing purposes, in other words in order to be able to promote and market our products to you.
- 5.10. Even when the data is processed for marketing purposes, it is based on a balancing of interests where we assess that our interest in marketing our products to you is such a legitimate interest that means that the processing is permissible. Such processing for marketing purposes will take places for a maximum of one year after our business relationship with you has ended.

*Data we need to process as required by law*

- 5.11. In addition to the above, we may process your personal data to fulfil legal obligations, for instance the obligation to keep accounting records, to the extent and during the time period as specified by law.

## **6. Consent to certain processing and “the right to be forgotten”**

*Consent to show your personal data to other partners*

- 6.1. A vitally important part of being a Zinzino Independent Partner is that you will be able to see what partners associated with you in what we refer to as the = “partner tree” have generated in terms of sales and that you will be able to track your development towards a higher partner status. Therefore, all Zinzino

Independent Partners are required to agree that their name, city, contact details, partner status and sales data, such as organisational structure, order data, sales, commissions, customer service commitments, will be shown to other Zinzino Independent Partners. Therefore when you become a Zinzino Independent Partner, you must agree that we process your personal data for this purpose. If you do not consent to this, it will not be possible for you to be a Zinzino Independent Partner.

- 6.2. You may, from time to time, also be offered the opportunity to provide us with additional information about you, other than what is stated above, via our website, such as uploading a picture of you or participating in promotions, etc. Any and all information you provide to us and which will not be used for any of the other purposes as stated above will be processed after obtaining your consent. At the present time, this applies to a) pictures you upload to our website, until you withdraw your consent or until your profile with us is deleted (for instance due to that long period of time has passed since your last order, and b) in regard to promotional campaigns, until the winner is announced and the prize in the campaign is given out. By participating in promotions with us, you also agree that your name and picture will be publicly publicised on our website, if you are one of the winners of the promotional campaign.

*Your right to revoke your consent*

- 6.3. With regards to your personal data and during the time your personal data is being processed only based on your consent, you may withdraw your consent at any time by contacting us. If you withdraw your consent in such case, the personal data we process based on only your consent will be deleted (the “right to be forgotten”). If the data is also being processed for other purposes, the data will instead no longer be processed for the purposes where the processing is based on your consent.**
- 6.4. If you withdraw your consent to allow your personal data to be shown to other Zinzino Independent Partners, it will no longer be possible for you to continue to be a Zinzino Independent Partner. Therefore, when you revoke your consent, this is considered as a notice of termination of your partner agreement.**

## **7. How we will process your information and who it can be provided to**

- 7.1. The personal data we process about you will primarily be processed internally within Zinzino and by companies in the same Group as us, however in relevant parts may be provided to the Zinzino Independent Partner who are to receive a commission or points on the sales to you or via you, as well as to companies that help us with the production and distribution of products and services, such as postal and parcel delivery companies and other vendors/suppliers. We also retain subcontractors, for example those providing customer service systems, that will receive access to your personal data as a personal data processor on our behalf.
- 7.2. Zinzino will not disclose your personal data to other companies for marketing purposes.

## **8. Where is your personal data stored?**

- 8.1. Your personal data is stored primarily in IT infrastructure provided by one of our personal data processors. The personal data is processed and stored primarily within the EU/EEA, with the exceptions set out below.

## **9. Data processed outside of the EU/EEA**

- 9.1. Zinzino retains personal data processors for the management of customer service systems, as well as suppliers and distributors outside of the EU/EEA. Therefore in connection with this processing, your personal data will be transferred to the United States and Canada.
- 9.2. With regard to Canada, the EU Commission has decided that there is an adequate level of protection for your personal data, which is why the processing is considered secure. Regarding the processing in the United States, there is no decision yet concerning adequate levels of protection. Instead, we have signed an agreement with the companies that will process your personal data as a processor on our behalf, or as a joint data controller (the latter applies to Zinzino’s Group companies in the United States) in accordance with the standard agreement clauses developed by the EU Commission which are regarded as ensuring a sufficient level of protection for the data. If you so desire, you can obtain a copy of the agreement with these companies by contacting us. For more information concerning the EU’s standard contract clauses, see e.g. [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_sv](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_sv).

**10. Your rights concerning access to the information we process**

- 10.1. You are entitled to receive notice of and information about the data we process about you, and a copy of the data (without charge), by contacting us. However for any additional copies, over and above the one you are entitled to receive free of charge, we will charge an administrative fee corresponding to the costs incurred in order to produce and provide you the additional copies.

**11. Your right to correction of incorrect data and deletion of data**

- 11.1. If you believe that any data about you is incorrect, you are entitled to request that the information be corrected or deleted. If such a situation arises, please contact us and tell us what information you think is incorrect and tell us why it should be corrected or deleted.

**12. Your right to object to certain processing**

**12.1. You are entitled to object to the part of our processing of your personal data that is based on the “balancing of interests.” For more information which processing this applies to, refer to sections 5.4 and 5.10 above.**

**12.2. In regards to the processing of personal data that is done for marketing purposes, you may make objections to this at any time. If you do so, your personal data will no longer be processed for marketing purposes. If you make an objection relating to other uses, we will consider it against the reasons we have to continue with the processing of your personal data.**

**12.3. Contact us if you want to make any objections to any part of the processing that takes place based on a balancing of interests.**

**13. Your right to a restriction or limitation**

- 13.1. You may also request that the processing of your personal data be limited (frozen) if in your opinion the personal data we are processing is not correct, if the processing would be unlawful/illegal, if we no longer need to retain or process the data but if you, despite this, still need them in order to be able to make a legal claim or if you have opposed the processing, and until we have dealt with your objections.

**14. Your rights to data portability**

- 14.1. You are entitled to obtain the personal data about you that you provided to us in a structured, widely-used and machine-readable format in order to be able to transfer this information to another data controller. This applies only to the information you yourself have provided to us, and only when the processing is based on your consent or for the purpose of being able to fulfil an agreement with you. If you want to obtain your personal data in this manner, please contact us.

**15. Your right to lodge a complaint**

- 15.1. At Zinzino, we take your privacy very seriously. We are therefore very happy that your personal data is always processed in a proper and secure manner. If you have any comments about our handling or processing of personal data, please feel free to contact us.
- 15.2. If you believe that our personal data processing is incorrect in some manner, you are entitled to file a complaint to the Swedish Integritetsskyddsmyndigheten/Protection of Privacy Authority (formerly the Datainspektionen), which is the regulatory authority for these matters. More information is available at [www.datainspektionen.se](http://www.datainspektionen.se).

**16. Governing Law**

- 16.1. The laws of India govern all matters arising from or related to the Web Site, including your access and use, and any Internet transaction between you and us. The Court at New Delhi will have the exclusive jurisdiction to entertain any dispute arising out of or in relation to the web site.
- 16.2. Children’s Privacy: The Zinzino Site is not targeted towards, nor intended for use by, anyone under the age of 18. By using the Zinzino Site, you represent and warrant that you are 18 years of age or older. If you are not at least 18 years of age, do not access, use or register on the Zinzino Site. In the event we become aware you are under 18, we will cancel your registration.
- 16.3. Our contact details are: Zinzino Health Products India Private Limited, S-327, Lower Ground Floor, 110048, NEW DELHI, South Delhi, Delhi, India.
- 16.4. You can reach our customer service at: +91 22 7127 9191 or via e-mail at: [support.in@Zinzino.com](mailto:support.in@Zinzino.com).