

Privacy Policy

Our Privacy Policy was last updated on November 08, 2023

1. The Purpose of this Privacy Policy

This Privacy Policy is designed to protect the privacy, secrecy, safety, unity, and integrity of the **Physical Life Web** application's users' personal data in accordance with the best international standards and practices.

The provisions of this Privacy Policy shall apply to the processing of Your personal data while using Application, whether totally or partially, through automatically operated electronic systems or other means.

We ensure your personal data is kept securely and protected from any breach, infringement, illegal or unauthorized processing. The Company establishes technical and organizational measures and procedures in accordance with the latest data protection legislation of the United Arab Emirates and Dubai Integrated Economic Zones Authority.

2. Definitions

As used in this Privacy Policy, the following terms shall have the following meanings:

The Company, We, Us: **Fizikl IQ - FZCO** – a company, including any of its employees, representatives, or agents, which provides remote informational support and familiarization with available nutrition and training programs for natural persons ("Service"). For the purpose of this Privacy Policy, the Company is the Data Controller.

Application: **Physical Life Web** application. Access to the Application is offered by the Company through the website pht.space.

Client: any natural person, who accesses or uses the Application and Service.

Service: services being provided by giving access to Application, as well as the functionalities of the Application itself.

Device: a mobile phone, a computer, or any other device with a web browser through which a Client can access the Application and Service.

Personal Data: 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.

Data Subject, You: any Client whose Personal Data are stored and processed under this Privacy Policy.

Processing: 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.

Data Controller: the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.

Data Processor: means any natural or legal person who processes Personal Data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

Counterparty: a third-party natural or legal person hired by the Company for the purposes of Service provision, or to perform related services, including analysis of the Service usage.

Cookies: small text files that are placed on Your device by a website containing the details of Your browsing history on that website, etc.

3. Purposes of Personal Data processing

The Company may process or ensure of processing of Personal Data for the following purposes:

To provide and maintain our Service, including provision of informational consultations, informational remote support, and Your familiarization with available nutrition and training programs, provision of other services chosen by You.

To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as the Application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

To provide You with news, special offers and general information about other goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.

To manage Your requests: to attend and manage Your requests to Us.

For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

With Counterparties: We may share Your personal information with our Counterparties to provide the Service, to perform related services, to monitor or analyze the use of our Service (analytical services), to process Your payments (payment services), or to contact You (i.a., email marketing).

With affiliates or agents: We may share Your information with Our affiliates or agents, in which case we will require those affiliates and agents to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.

4. Types of Data Collected

Personal Data

The Company processes or ensures of processing of the following types of Personal Data:

- § Individual and contact details: name, address, email, telephone number, date and place of birth, gender, etc.
- § Your physical health; medical condition; history; height; weight; age; circumferences of neck, waist, and hips; activity level; stress level and psychological state; nutritional habits; sleeping habits; past medical history; current health condition; drugs and other supplements intake; activity patterns, etc.
- § Your photos and videos.
- § Other identifiers: IP address, cookies, etc.

Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your device's Internet Protocol address (e.g., IP address), the pages of our Service that You visit, the time and date of Your visit, Your geolocation, the time spent on those pages, unique device identifiers and other diagnostic data.

We may collect certain information automatically, including, but not limited to, the type of the device You use, Your device's unique ID, the IP address of Your device, Your operating system, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a device.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

§ Cookies or Browser Cookies. A cookie is a small file placed on Your device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal device when You go offline, while Session Cookies are deleted as soon as You close Your Application or web browser.

We use both Session and Persistent Cookies for the purposes set out below:

§ Necessary / Essential Cookies

Type: Session Cookies

Purpose: These Cookies are essential to provide You with services available through the Application and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

§ Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Purpose: These Cookies identify if users have accepted the use of cookies on the Application.

§ Functionality Cookies

Type: Persistent Cookies

Purpose: These Cookies allow us to remember choices You make when You use the Application, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Application.

§ Tracking and Performance Cookies

Type: Persistent Cookies

Purpose: These Cookies are used to track information about traffic to the Application and how users use the Application. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the

information collected is typically linked to a pseudonymous identifier associated with a device you use to access the Application. We may also use these Cookies to test new pages, features or new functionality of the Application to see how our users react to them.

5. Principles of Personal Data protection

Processing must be made in a fair, transparent, and lawful manner.

Personal Data may be collected for the purposes stated in this Privacy Policy and may not be processed in a manner incompatible with such purposes. Personal Data may be processed if the purpose of processing is similar or close to the purpose for which such data are collected.

Personal Data shall be sufficient for and limited to the purpose for which the processing is made.

Personal Data must be accurate and correct and must be updated whenever necessary.

Personal Data must be kept securely and protected from any breach in accordance with other principles set by this Privacy Policy.

6. Sources of Personal Data

The sources from which the Company collects Personal Data may include:

- § the natural person whose data is being collected,
- § our Clients,
- § our Counterparties,
- § other third parties,
- § publicly available registers or sources of information, etc.

7. Transfer of your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices, Data Processors' operating offices, and in any other places where the parties involved in the processing are located. It means that this information may be stored and maintained on — and transferred to — computers located outside of Your province, country, or other governmental jurisdiction where the data protection laws may differ than those of Your jurisdiction.

Your information may be transferred to the country or territory which has adequate level of data protection determined by the UAE authorities and countries that the UAE is entered to bilateral or multilateral agreements related to Personal Data Protection.

In case the country or territory is not deemed by the UAE authorities as the country or territory with adequate level of data protection, but in order to provide You with the services by the Company there is a necessity of such cross-border transfer, Your information may be transferred to those countries or territories under the Company's obligation to ensure the level of data protection set out by the UAE legislation. Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to aforementioned transfers.

The Company will take all steps reasonably necessary to ensure that Your Personal Data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there is an adequate level of personal data protection, or appropriate safeguards are implemented.

8. Disclosure of your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if it is required by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- § Comply with a legal obligation.
- § Protect and defend the rights or property of the Company.
- § Prevent or investigate possible wrongdoing in connection with the Service.
- § Protect the personal safety of Users of the Service or the public.
- § Protect against legal liability.

9. Technical and organizational measures

The Company shall take the appropriate technical and organizational measures and procedures to apply the necessary standards to protect and secure Personal Data, in order to maintain its confidentiality and privacy and to ensure that it is not infringed, damaged,

altered or tampered with, taking into account the nature, scope and purposes of processing and the potential risks to the confidentiality and privacy of the Personal Data.

The Company shall ensure that the processing of Personal Data is limited to its intended purpose(s).

The Company shall apply appropriate measures, both when defining the means of processing and during the processing itself, in order to comply with the applicable data protection legislation, and provisions of this Privacy Policy.

In case of appointment of Processor(s), the Company shall ensure that such Processor(s) provides sufficient guaranties to apply technical and organizational measures in a manner that ensures that the processing meets the provisions of this Privacy Policy, as well as requirements, rules, and principles stipulated in the applicable personal data protection legislation.

The Company shall not take any action that would disclose the Personal Data or the results of processing, except in cases permitted by law.

The Company shall comply with other obligations arising from this Privacy Policy or the applicable personal data protection legislation.

The security of Your Personal Data is important to Us, but remember that no method of transmission via the Internet, or method of electronic storage is 100 percent secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

10. Detailed Information on the Processing of Your Personal Data

Counterparties have access to your Personal Data only to perform their tasks on our behalf and are obligated not to disclose or use it for any other purpose. These third-party vendors collect, store, use, process, and transfer information about Your activity on Our Service in accordance with their Privacy Policies in the following situations:

Analytics

We may use third-party Counterparties to monitor and analyze the use of our Service. Such as:

Metabase

Google Analytics

Firebase

Cloud Message

Email Marketing

We may use Your Personal Data to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You. You may opt-out of receiving

any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send, or by contacting Us. For this purpose, we use: Getcourse

Payments

We may provide paid products and/or services within the Service. In that case, we may use third-party services for payment processing (e.g., payment processors).

We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policies. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information. Main payment processors that we use are:

PayPal

Stripe

The Client who is the Data Subject confirms that his/her consent to Personal Data processing is given in a clear, simple and unambiguous manner.

If the Client provides (disclose) Personal Data of another Data Subject, this Client guarantees that he/she has the prior consent of the Data Subject for such disclosure.

Data Subject may, at any time, withdraw his/her consent to the processing of his/her Personal Data. Such withdrawal shall not affect the legality and lawfulness of the processing made based on the consent given prior to such withdrawal.

12. GDPR Privacy

Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following conditions:

- § Consent: You have given Your consent for processing Personal Data for one or more specific purposes.
- § Performance of a contract: Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- § Legal obligations: Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- § Vital interests: Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.

- § Public interests: Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- § Legitimate interests: Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

13. Your Rights under this Privacy Policy

The Company undertakes to respect the confidentiality and privacy of Your Personal Data and to guarantee You can exercise Your rights.

Under this Privacy Policy, You have the following rights:

- § Request access to Your Personal Data. The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of Your Personal Data We hold.
- § Request correction of Your Personal Data that We hold. You have the right to have any incomplete or inaccurate information We hold about You corrected.
- § Object to processing of Your Personal Data. This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- § Request the erasure of Your Personal Data. You have the right to ask Us to delete or remove Your Personal Data when there is no good reason for Us to continue processing it.
- § Request the transfer of Your Personal Data. We will provide to You, or to a third party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format if such transfer is technically possible. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.
- § Withdraw Your consent. You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to the Service or its certain specific functionalities.

14. Exercising of Your rights

You may exercise Your rights of access, rectification, cancellation, and opposition by contacting Us. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible.

If You are in the European Economic Area (EEA), You have the right to complain to a respective national data protection authority about Our collection and use of Your Personal Data. For more information, please contact Your national data protection authority.

15. Retention of data

The Company shall only retain the Personal Data for as long as it is necessary to fulfill the purpose for which it was collected.

The Personal Data will typically be retained by the Company for the duration of the relevant retainer unless such information is or may be otherwise required to be retained for a longer period by any applicable laws or regulations, in which case such Personal Data shall be retained for the required period.

16. Changes

The Company reserves the right to amend this Privacy Policy from time to time. You are advised to review this Privacy Policy periodically for any changes. Any updates will be immediately uploaded to the Application and are effective when they are posted.

17. Contact us

If you have any further questions, concerns, or complains in relation to our use of Your Personal Data, please do not hesitate to email our contact person Oleg Zingilevskii on privacy issues or submit requests at info@physical-transformation.com.