

PRIVACY POLICY

In this privacy policy we, UAB "Greatness", company code 306027320, with registered office at Aludariu str. 3, Vilnius, Lithuania ("**Company**", "**we**", "**us**" or "**our**"), explain how we handle your personal data when you visit our website, use our services, contact us through our official social media pages or email.

In case you have any privacy-related inquiries or requests associated to physical goods, you may contact us by the email info@kureapp.health. You may also contact Data Protection Officer of the Company regarding all privacy related issues by email: aurimas.kavaliauskas@kilo.health

In this notice you will find the answers to the following questions:

- (a) how we use your data;
- (b) when we provide your data to others;
- (c) how long we store your data;
- (d) what is our marketing policy;
- (e) what rights related to personal data you possess;
- (f) how we use cookies;
- (g) other issues that you should take into account.

When processing personal data, the Company is guided by and complies with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC ("**GDPR**") and any other applicable legal acts governing the protection of your personal data.

The Company acts as a data controller of your personal data. In case of any inquiries or if you would like to exercise any of your rights provided in this notice, you may submit such inquiries and requests by the email.

All the definitions used in this privacy policy have the same meaning as prescribed in the Company's General Terms and Conditions unless expressly provided otherwise in this privacy policy.

In the event this privacy policy is translated into other languages and if there are differences between the English version and such translation, the English version shall prevail, unless otherwise provided.

1. HOW WE USE YOUR PERSONAL DATA?

1.1. This Section provides the following information:

- (a) categories of personal data, that we process;
- (b) in case of the personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) the purposes for which we may process your personal data; and
- (d) the legal bases of the processing.

1.2. We process information relating to provision of services by us to you ("**service data**"). The service data may include your contact details (such as your email address), bank account and transaction details as well as other information that you provide to us while filling up the relevant questionnaires (such may include sensitive personal data, related to your health). The service data is processed to provide services as well as keep proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our website and business. In case of sensitive personal data, related to your health the legal basis for processing is your explicit consent.

1.3. We may process information that you provide to us for the purpose of subscribing to our email messages and newsletters ("**messaging data**"). The messaging data is processed to send you the relevant messages and newsletters. The legal basis for this processing is your consent. Also, if we have already sold products for you via our website, and you do not object, we may also process messaging data on the basis of our legitimate interest, namely seeking maintain and improve customer relations, to suggest our similar products to you.

1.4. We may process information relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content (e.g. email address, content of the message) and metadata associated with the communication (e.g. device system name, system version, model, display etc.). The correspondence data is processed for the purposes of communicating with you and record-keeping. The legal basis for

this processing is your consent and/or our legitimate interests, namely the proper administration of our website, business, ensuring uniform and high-quality consultation practice and for investigating disputes between you and our employees.

- 1.5. We may process information on your use of our website as well as on your device (“**device data**”) when you are browsing our website. Device data may include IP address, mobile network information, geographical location, browser type and version, operating system, device type, logging information, screen resolution and (in case you agree to share such) your location data as well as information on the motion activity, use of our website (i.e. referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use). We obtain such data through the use of cookies and similar technologies. Device data is processed to enhance the website as well as to set default options. We also use such data to have a better understanding of how you use our website as well as for securing the website. The legal basis for this processing is our legitimate interest, namely the proper management of our website, business (e.g. use of cookies and similar technologies) your consent.
- 1.6. We may process any of your personal data identified in this notice where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 1.7. We may process any of your personal data identified in this notice where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 1.8. In addition to the specific purposes for which we may process your personal data set out in this Section, we may also process your personal data to the necessary extent where such processing is necessary for compliance with a legal obligation to which we are subject.
- 1.9. Should the purpose or legal basis of data processing activities indicated in this paragraph change, we will inform you and, if the consent was the legal basis for data processing, will re-obtain your consent.
- 1.10. Sometimes we may aggregate, anonymize or de-identify your personal data in such a way so that it cannot reasonably be used to directly or indirectly identify you. Such data is no longer personal. We may use such data without restriction in any way allowed by law, including, but not limited to share such data with our partners or research institutions, share in articles, blog posts and scientific publications, aggregate statistics about certain activities or symptoms from data collected to help identify patterns across users and evaluate or modify our services.
- 1.11. We are following the principle of data minimisation: personal data processed is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- 1.12. Personal data is stored either on the servers of the Company or of our contractors, who are bound by specific contractual clauses regarding the processing of personal data as well as by the confidentiality obligations.
- 1.13. We are using a number of technical and organisational means to protect your personal data. Organisational security measures include restricting access solely to authorised persons with a legitimate need to access personal data, signing confidentiality agreements, arranging trainings, creating and implementing relevant policies and procedures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, implementing access control and authentication tools, ensuring physical security etc.

2. WHEN WE PROVIDE YOUR DATA TO OTHERS?

- 2.1. We may disclose your personal data to any member of our group of companies (including our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this notice. Such may include internal administration purposes as well as provision/sharing of IT, payment or marketing services or data centres in the group.
- 2.2. We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

- 2.3. We may disclose your personal data to our anti-fraud, risks and compliance providers insofar as reasonably necessary for the purposes of protecting your personal data and fulfilling our legal obligations.
- 2.4. To order our products, you will be required to provide certain financial information (e.g. card holder name, surname, card number, data, CVV) in order to facilitate the processing of payments. Please note that we use third party payment processor services, thus, we do not collect and store card information. Your card information will be directly received by the payment service provider as a data controller. We will only receive information about the payment status and store only the last 4 digits of your card.
- 2.5. To offer you Klarna's payment methods, we might in the checkout pass your personal data in the form of contact and order details to Klarna, in order for Klarna to assess whether you qualify for their payment methods and to tailor those payment methods for you. Your personal data transferred is processed by Klarna, as your Personal data controller, and in line with Klarna's own privacy notice: <https://www.klarna.com/international/privacy-policy/>.
- 2.6. We may disclose your personal data to other service providers insofar as it is reasonably necessary to provide specific services (including, providers of servers and maintenance thereof, email service providers, development service providers, service providers used for data analysis or marketing, call centres, customer satisfaction surveys or market research). We take all the necessary measures to ensure that such subcontractors would implement proper organisational and technical measures to ensure security and privacy of your personal data and also would be bound by specific contractual clauses regarding the processing of personal data as well as by the confidentiality obligations.
- 2.7. In addition to the cases already mentioned in this privacy policy, please be noted that we may transfer your personal data to other business subjects, in case of transfer of the Company's business and/or services or part thereof, Company's merger with other legal entity or acquisition, including subjects carrying out legal due diligence.
- 2.8. In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

Persons or legal entities, indicated in this Section may be established outside the Republic of Lithuania, European Union and European Economic Area. In case we will transfer your personal data to such persons, we will take all the necessary and in the legal acts indicated measures to ensure that your privacy will remain properly secured, including where appropriate, signing standard contractual clauses for transfer of data. To find out more information regarding appropriate safeguards you may contact us via email indicated in this privacy policy.

3. HOW LONG WE STORE YOUR DATA?

- 3.1. Your personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. In any case it shall be kept for no longer than:
 - (a) service data will be retained for no longer than 5 (five) years following the end of provision of our services;
 - (b) messaging data will be retained for no longer than 2 (two) years following the provision of consent or, in case, the messaging data is being sent to the present clients in order to maintain and improve customer relations, for no longer than 2 (two) years following the end of provision of the respective services, unless you respectively withdraw your consent earlier or object to such processing;
 - (c) correspondence data will be retained for no longer than 6 (six) months following the end of such communication;
 - (d) device data will be retained for no longer than 2 (two) years following the provision of your consent or, in case, processing of device data is based on our legitimate interest (e.g. for proper management of our website, business), such device data will be processed as long as it is necessary to fulfil our legitimate interest.
- 3.2. After the end of applicable retention period, or upon your request personal data is irreversibly destructed using overwriting or physical destruction (when applicable) methods.
- 3.3. Notwithstanding the other provisions of this Section, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, and / or in order to protect your vital interests or the vital interests of another natural person (if necessary).

4. MARKETING COMMUNICATION

- 4.1. In case you consent, we will contact you via email or phone to inform on what we are up to. Please note, that your consent is not a condition of any purchase. Also, if we already have provided our products and / or services to you and you do not object, we will inform you about our Companies or our members of our group Companies other products that might interest you including other information related to such via email or phone, when such were provided to us by you.
- 4.2. When contacting you by phone as provided in section 4.1. above, SMS/text messages from us will be received through your wireless provider to the mobile number you provided. SMS/text messages may be sent using an automatic telephone dialing system or other technology. Message frequency varies. Message and data rates may apply.
- 4.3. You may opt-out of receiving any marketing communications at any time. You may do so by choosing the relevant link in any of our marketing messages or contacting us via means provided in our website. If you are receiving both email and phone marketing communications on the grounds provided in section 4.1. above and you wish to opt-out of receiving them, you will need to opt out separately by following the relevant link in any of our marketing messages or contacting us via means provided in our website.
- 4.4. Upon you having fulfilled any of the provided actions we will update your profile to ensure that you will not receive our marketing communication in the future.
- 4.5. In case you opt-out of receiving marketing communications, we will immediately stop sending marketing communications to you. Nevertheless, please be informed that as our business activities consists of a network of closely related services, in certain cases it may take a few days until all the systems are updated, thus you may continue to receive marketing communication while we are still processing your request.
- 4.6. In any case, the opt-out of the marketing communications will not stop you from receiving communication directly related to the provision of services.

5. YOUR RIGHTS

- 5.1. In this Section, we have summarised the rights that you have under data protection laws. Some of the rights are complex thus we only provide the main aspects of such rights. Accordingly, you should read the relevant laws (first and foremost the GDPR) and guidance from the regulatory authorities for a full explanation of these rights.
- 5.2. Your principal rights under data protection law are the following:
 - (a) the right to be informed about processing of personal data;
 - (b) the right to access data;
 - (c) the right to rectification;
 - (d) the right to erasure of your personal data;
 - (e) the right to restrict processing of your personal data;
 - (f) the right to object to processing of your personal data;
 - (g) the right to data portability;
 - (h) the right to complain to a supervisory authority;
 - (i) the right to withdraw consent; and
 - (j) the right to request not to be a subject to a decision based solely on automated processing, including profiling.
- 5.3. The right to be informed about processing of personal data. You have the right to obtain information about the personal data processed by the us, the sources of the personal data, the purposes of the processing, the legal grounds, the retention period, data recipients or data processors, your rights and etc.
- 5.4. The right to access data. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

- 5.5. The right to rectification. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 5.6. In some circumstances you have the right to the erasure of your personal data. Those circumstances include when: (i) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) you withdraw consent to consent-based processing and there are no other legal basis to process data; (iii) you object to the processing under certain rules of applicable data protection laws; (iv) the processing is for direct marketing purposes; or (v) the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. Such exclusions include when processing is necessary: (i) for exercising the right of freedom of expression and information; (ii) for compliance with our legal obligation; or (iii) for the establishment, exercise or defence of legal claims.
- 5.7. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are when: (i) you contest the accuracy of the personal data; (ii) processing is unlawful but you oppose erasure; (iii) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and (iv) you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data, however we will only further process such data in any other way: (i) with your consent; (ii) for the establishment, exercise or defence of legal claims; (iii) for the protection of the rights of another person; or (iv) for reasons of important public interest.
- 5.8. You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 5.9. You have the right to object to our processing of your personal data for direct marketing purposes. If you make such an objection, we will cease to process your personal data for this purpose.
- 5.10. You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 5.11. The right to data portability. To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
 - (b) performance of a contract or steps to be taken at your request prior to entering into a contract, necessary to enter into such,
- you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 5.12. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. Our data processing is supervised by State Data Protection Inspectorate of the Republic of Lithuania, registered office at L. Sapiegos St. 17, LT-10312 Vilnius, email address ada@ada.lt, www.vdai.lrv.lt
- 5.13. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 5.14. You have the right to request not to be a subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. However, there are exclusions of this right. Such exclusions include when the decision: (i) is necessary for entering into, or performance of, a contract between you and us; (ii) is authorised by EU or EU member state law to which we are subject to and which also lays down suitable measures to safeguard the your rights and freedoms and legitimate interests; (iii) is based on your explicit consent.

In addition to specific measure provided in this Section or the website you may also exercise any of the rights indicated herein by contacting us by email indicated in this privacy policy.

- 5.15. We undertake to respond to such inquiries within 1 month after it is received. This response time may be extended by 2 months for complex or multiple requests. In case of such extension, we will inform you additionally.

6. ABOUT COOKIES

- 6.1. Cookies are small textual files containing identifier that is sent by a web server to your web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 6.2. We will ask you to consent to our use of cookies in accordance with the terms of this and cookie notices when you first visit our website.
- 6.3. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

7. COOKIES THAT WE USE

In the website we use cookies of three main types, for the following purposes:

- (a) Required cookies – used to ensure proper performance of the website, security of customers and their data, provision of high-quality services;
- (b) Functional cookies – used to enhance the website user experience, analyse the use of the system and in accordance to such improve the provision of services;
- (c) Advertising cookies – used to observe user online behaviour and optimize marketing campaigns according to such information.

8. COOKIES USED BY OUR SERVICE PROVIDERS

- 8.1. Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 8.2. We may use:
- (a) Google Analytics cookies to observe our website traffic. Cookies used for this purpose help us detect website errors as well as measure website bandwidth. You can view the privacy policy of Google Analytics [here](#);
 - (b) Youtube cookies to display in our website content uploaded in Youtube. Cookies used for this purpose help us maintain integrity, create informative and dynamic website. You can view the privacy policy of Youtube [here](#);
 - (c) Twitter cookies to display in our website content posted in Twitter. Cookies used for this purpose help us maintain integrity, create informative and dynamic website. You can view the privacy policy of Twitter [here](#);
 - (d) Google Maps cookies to, if the user permits, determine users location. Cookies used for this purpose help us adapt website settings in accordance to user's location and improve user experience in our website. You can view the privacy policy of Google Maps [here](#);
 - (e) DoubleClick cookies to control the display of ads to our users. Cookies used for this purpose help us distinguish users that already use our services and reduce or stop displaying our ads to such users. You can view the privacy policy of Doubleclick [here](#);
 - (f) Facebook cookies to manage the display of ads to our users. Cookies used for this purpose help us distinguish users that already use our services and reduce or stop displaying our ads to such users. You can view the privacy policy of Facebook [here](#);
 - (g) Google Tag Manager cookies to control advertising cookies. Cookies used for this purpose help us properly distribute ads to users. You can view the privacy policy of Google Tag Manager [here](#);
 - (h) Hotjar cookies to observe how users use our website. Cookies used for this purpose help us observe the performance of the website and analyse how we can improve our website. You can view the privacy policy of Hotjar [here](#);
 - (i) Visual Website Optimiser cookies that are used for collecting information on how visitors interact with the pages on website. You can view the privacy policy of Visual Website Optimiser [here](#).

9. HOW CAN YOU MANAGE COOKIES?

- 9.1. Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via information provided in the relevant browser website, for example [Chrome](#); [Firefox](#); [Internet Explorer](#); [Safari](#).
- 9.2. Blocking all cookies will have a negative impact upon the usability of many websites.
- 9.3. If you block cookies, you will not be able to use all the features on our website.

10. THIRD PARTY WEBSITES

On the website you may find links to and from partner sites, information sources and related party websites. Please take note that such third-party website that you will visit by clicking on links have their own privacy policies and we take no responsibility regarding such privacy policies. We recommend familiarising with privacy policies of such websites before providing any personal data to such.

11. CHILDREN PERSONAL DATA

- 11.1. Our website and services are targeted at persons over the age of 18.
- 11.2. If we have reason to believe that we hold personal data of a person under that age in our databases without having consent from the parent rights holder, we will delete that personal data.

12. CALIFORNIA PRIVACY ADDENDUM

If you are a California consumer or resident, in addition to the information provided in this privacy policy, you may have the additional rights and information provided to you under the California Consumer Privacy Act:

- (a) We do not knowingly sell personal information nor share it with third parties for direct marketing purposes. However, if we do so in the future, you will be notified and have the right to opt-out of the "sale" of personal information;
- (b) We will retain, use, or disclose personal information we collect or processes on your behalf, only for the purposes described in this privacy policy, and will notify you if this changes.
- (c) You have the right to not be subject to discrimination if you exercise any of your rights.

We do not currently recognize or respond to browser-initiated Do Not Track signals. Instructions to enable for the following browsers are here: [Chrome](#), [Firefox](#), [IE](#), [Edge](#), [Safari](#), [Opera](#).

13. UPDATING YOUR DATA

Please let us know if the personal information that we hold about you needs to be corrected or updated.

14. CONTACTS

In case of any inquiries or if you would like to exercise any of your rights provided in this notice, you may submit such inquiries and requests by the following contact details:

UAB "Greatness"

Company code 306027320

Registration address Aludariu str. 3, Vilnius, Lithuania

15. CHANGES TO THE NOTICE

Any changes to this notice will be published on the website and, in case of material changes, we may inform you about such via email or by other means which we will deem the most fitting in a particular case. Any changes to the privacy policy shall come into force from the date of their publication, i.e. from the date they are posted on the website.