

# Corporate & Privacy Policy

*Version updated on February 7<sup>th</sup> 2022*

We attach great importance to the protection of your personal data. As such, when collecting and processing it we are guided by these four principles:

- **Transparency:** we explain what we collect and why we collect it, so that you can make the most well-informed decision possible;
- **Security:** all the data that you have entrusted to us benefits from strong security;
- **Legal guarantees:** we respect data protection laws;
- **User benefit:** when we collect data, it is in order to improve the service and experience we offer, on our websites, App and with our products.

These principles are the foundations on which we wish to grow: in an increasingly connected world, we choose to give our users the widest possible control of their data and to protect the data that is entrusted to us. **Our aim is to offer you the best products and the best services.**

This Privacy Policy is therefore intended to provide you with a more detailed overview of our approach to your personal data, to explain those cases in which we still need to collect information about you, the reasons we therefore collect this data, and how we use it. It also outlines the security

measures we use to protect its confidentiality, and remind you of your rights and how to exercise them.

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# 1. GENERAL INFORMATION

EVO Human Performance PC whose head office is located at Grammou 10, in Melissia Athens (15127), Greece (hereinafter "**EVO Human Performance**" or "**we**") is responsible for processing your personal data. EVO Human Performance has appointed one Data Protection Officer for EVO Human Performance. The EVO Human Performance Data Protection Officer can be contacted via e-mail [dpo@evo4hp.com](mailto:dpo@evo4hp.com) or via telephone +30 6936738149 The EVO Human Performance Data Protection Officer is supported by other responsible EVO Human Performance employees in the local country EVO Human Performance offices in order to implement the local country data protection applications.

This Privacy Policy (hereinafter the "**Policy**") intends to inform you of our practices regarding the collection, use and sharing of information that you provide or that we collect through our website [www.evo4hp.com](http://www.evo4hp.com) the "**Website**") or our mobile applications (the "**App**"); and tell you how to exercise your rights.

The Regulations on Personal Data (hereinafter the "**Regulations**") encompass the regulation (EU) 2016/679 of 27 April 2016 on the protection of personal data (regulation known as "GDPR") and any law or regulation that might apply these.

Personal data (hereinafter "**Personal data**") refers to any information relating to an identified or identifiable natural person who may be identified personally, directly or indirectly, in particular by means of an identifier, such as a surname, first name, an identification number, location data or an

online username. The data we collect may therefore include your strictly personal data, insofar as it allows you to be identified as a particular person. Conversely, some data does not allow us to identify you directly, such as your profession or your browsing data (the type of browser, terminal and operating system, the path followed on the website, etc.) but is nevertheless considered as Personal Data because it is attached and/or attributable to the former.

This Policy is an integral part of the terms and conditions of sale on the Website and the conditions of use of the App. By accepting the general conditions of sale of the Website and the conditions of use of the App you expressly accept the provisions of this Policy.

Please read this document carefully in order to be aware of and understand the practices regarding the processing of your Personal Data that we implement and the rights that you are entitled to.

## **2. PROCESSING DATA COLLECTED BY EVO HUMAN PERFORMANCE**

When you use our Website and/or our App, your consent will be required prior to any collection of your Personal Data. EVO Human Performance and its affiliates may exchange such Personal Data and use it in accordance with this Policy. You do not have to give us all of the Personal Data that we ask for. However, if you choose not to share it, access to certain services implemented by our Website and/or our App may be limited.

Any information that you may have provided to EVO Human Performance during your visits to our Website or when using our App is strictly confidential. Among other things, this information is necessary for processing orders on the Website or implementing the services offered by the App.

For more information, please consult the table that appears in Appendix 1, summarizing how EVO Human Performance processes Personal Data through its Website and App.

## 2.1. Legal basis for the processing of Personal Data

In accordance with the Regulations, most of the processing referred to in this Policy has received your prior consent.

Processing that has not received your consent are rendered necessary for carrying out our contractual obligations in relation to the services offered on the Website and/or our App, are dictated by a legal obligation incumbent upon us or based on a legitimate interest.

## 2.2. Types of Personal Data collected by EVO Human Performance

### Personal Data that you share with us

When you use the Website and/or the App, you may be required to voluntarily share your Personal Data with us. Most particularly, this Personal Data is transmitted to EVO Human Performance when:

- You create an EVO Human Performance Cloud user account via the Website and/or the App;

- You use the Website and/or the App;
- You contact our customer services department.

These Personal Data includes the following elements: your surname, first name(s), password, email address, date of birth, telephone number, other technical data (including geolocation and serial number of relevant equipment/accessories). The optional nature of the data is communicated to you when it is collected.

#### Personal Data that EVO Human Performance automatically collects

By browsing our Website, we automatically collect cookie data that allows or facilitates electronic communication or is strictly necessary for the provision of an online communication service.

#### Personal Data that EVO Human Performance obtains from third parties

If you download an app through an app download platform and make in-app purchases, if you connect to our Website and/or our App via social media, we will have access to certain Personal Data in accordance with the general conditions of use of the platforms and the social network concerned (for more details on social media, please refer to article 7 "LOGIN WITH GOOGLE/APPLE AND SOCIAL MEDIA PLUG-INS").

## 2.3. Authorisation to access the features of the Terminal

Our App enables the products sold by EVO Human Performance to be used on a computer, tablet, smartphone, phone, etc. (Hereinafter the "Terminal"). A request to access the geolocation services or storage of the Terminal may be required for the proper functioning of our App. We invite you to read the instructions on your Terminal to learn how to modify the authorization settings granted to an app and to control the sharing of personal details or access to the storage of the Terminal. Under no circumstances will EVO Human Performance collect Personal Data relating to these authorizations.

## 3. DATA RETENTION AND DELETION

We keep your Personal Data as long as necessary, particularly to fulfill our contractual obligations, comply with our legal obligations or resolve disputes. We retain some of your Personal Data for as long as you have a EVO Human Performance account.

Upon your request, we will delete or anonymize your Personal Data so that you can no longer be identified, unless the law authorizes or compels us to retain certain Personal Data, particularly in the following situations:

- If there is an unresolved issue with your account, such as an outstanding debt or an unresolved claim or litigation, we will retain the necessary Personal Data until the issue is resolved;

- If we are required to retain Personal Data as a result of legal, tax, auditing and accounting obligations, we will retain the necessary Personal Data for the period required by the applicable law; and/or
- If this data is required for our legitimate interests, such as fraud prevention or the security of our users.

In addition, EVO Human Performance may on its own initiative anonymize some of your Personal Data.

In all other circumstances, we will retain your Personal Data for a period that we deem reasonable.

**For more information, please consult the table that appears in Appendix 1, summarizing how long EVO Human Performance retains your Personal Data for processing it via its Website and App.**

## **4. SHARING PERSONAL DATA WITH THIRD PARTIES**

We will not transmit your Personal Data to third parties who may use it for commercial purposes without your express consent.

In accordance with applicable law and with your consent when required, we may aggregate the Personal Data that we receive or send to our business partners, including any or all of your Data collected via cookies.

We rely on trusted third parties to carry out various operations on our behalf. We can provide them with the information they need to carry out a given service and request that they do not use your Personal Data for any other purposes. We may be required to transfer certain Personal Data to them if it is



required for (i) the operation, management, maintenance of our Website and/or our App; (ii) ensuring that the tasks necessary for the fulfilment of your order on the Website (technical services, payment services, verification of identity) are completed or ensuring the fulfilment of the services offered by the App; (iii) implementing certain elements of the after-sales service; (iv) combating fraud; (v) responding to requests from the authorities.

Your Personal Data may therefore be transferred to a third party when we have a legal obligation to do so or if we believe in good faith that this is necessary to (a) comply with any legal request; (b) comply with any requests from the authorities; (c) in an emergency involving public health or the physical integrity of a person; (d) in the course of enquiries and investigations; or (e) to secure the rights, property and safety of EVO Human Performance and more generally any third party.

## **5. TRANSFER OF DATA OUTSIDE THE EUROPEAN UNION**

We store your Personal Data in servers located in the European Union. However, it is possible that the Personal Data we collect when you use our Website and/or our App are transferred to other countries, some of which may have less protective personal data protection legislation than the one in force in the country where you reside. We undertake to take all the measures required to ensure that contractual commitments with these third parties are in accordance with the Regulations. These measures may include checking the standards applied by these third parties for the protection of personal data and

security and/or the signing of appropriate contracts (based on the model adopted by the European Commission).

We can use the services of subcontractors located outside the European Union, particularly for managing your order on the Website, responding to your requests for after-sales services, providing online payment tools or providing us with commercial and advertising services. This is also the case for EVO Human Performance affiliates located outside the European Union to whom we may transfer some of your Personal Data for the purposes of providing our services in those countries.

For more details on the transfer of your Personal Data outside the European Union, please contact us at the following address: [dpo@evo4hp.com](mailto:dpo@evo4hp.com)

## 6. CONTROLLING PERSONAL INFORMATION SHARED WITH EVO HUMAN PERFORMANCE

### 6.1 Rights relating to your Personal Data

In accordance with the Regulations in force, you have a set of rights relating to the Personal Data relevant to you, including:

- **A right of access:** you can obtain a copy of all your data processed by EVO Human Performance, as well as information about the nature of the processing of your data.

- **A right to rectification:** you can obtain the rectification and/or completeness of your inaccurate and/or incomplete data.
- **A right to erasure:** you can obtain the erasure of your data when (i) this data is no longer necessary for the purposes for which it was collected, (ii) you exercise your right to oppose the processing concerned, or (iii) the processing concerned is illicit. However, this right does not apply when it is necessary for EVO Human Performance to store your data to comply with a legal obligation or to exercise rights in court;
- **A right to restriction of processing:** you can obtain a restriction of processing of your data when you dispute the accuracy of the data for a period of time that allows EVO Human Performance to carry out the appropriate verifications. It is the same when EVO Human Performance no longer needs the data but it is still required by you to defend a right in court, or when you exercise your right of opposition, for the time required by EVO Human Performance to examine your request. When such a limit is put in place, the data can only be processed, except for its retention, with your consent or for the defense of a right in court.
- **A right to portability:** you can obtain the data that you have provided to EVO Human Performance and which is used by EVO Human Performance as part of the processing necessary to fulfill your contract, in a structured, commonly used and machine-readable format, and its transmission by EVO Human Performance to another provider where this is technically possible.

- **A right to object:** you can request that EVO Human Performance, for reasons relating to your particular situation, stops processing your data in order to pursue its legitimate interests. EVO Human Performance will then cease such processing unless it justifies its legitimate and compelling interests over your rights and freedoms.
- **A right to define general and specific guidelines** defining the manner in which you intend to exercise the above rights **after your death**.

## 6.2 Procedure for exercising your rights

To exercise your rights over your Personal Data, you can e-mail your request (i) to the address [privacy@gaiarobotics.gr](mailto:privacy@gaiarobotics.gr) or (ii) send it by mail to EVO Human Performance PC, Grammou, 10, 15127 Melissia (Greece); giving your surname, first name, email address and if possible, your customer reference. In accordance with the regulations in force, your application must be signed and accompanied by a photocopy of an identity card bearing your signature and provide the address to which we must send you our response.

Please note that we may retain certain information about you when required by law or if there is a legitimate interest such as fraud or EVO Human Performance providing feedback to the authorities in charge of civil aviation. For example, this is the case if we consider that you have committed fraud or

violated the Terms of Use of the Website and/or App and we want to prevent you bypassing the rules applicable to our community.

## **6.3 Lodging a complaint with the supervisory authority**

You also have the right to lodge a complaint with the French supervisory authority or that of the country in which your habitual residence is located if you consider that the processing carried out by EVO Human Performance violates the provisions of the European Regulation on the protection of personal data. As an example, in Greece, the supervisory authority in charge of compliance with personal data obligations is the Hellenic Data Protection Authority (HDPa).

# **7. LOGIN WITH GOOGLE/APPLE AND SOCIAL MEDIA PLUG-INS**

## **7.1. Login to EVO Human Performance via Google/Apple unique authentication mechanism**

You have the option of connecting to an EVO Human Performance account through Google/Apple unique authentication mechanism, which makes it easier to register or connect. A first connection via Google/Apple unique authentication mechanism means that you will always be able to connect to your EVO Human Performance account this way. You can unlink these accounts at any time if you wish.

We draw your attention to the fact that if you decide to let us access some of your information, including your Personal Data, through connection services provided by third parties, their privacy policies can also legally bind you. We have no control over the collection or processing of your Personal Data carried out by third parties on their own platform.

When you choose to connect to your EVO Human Performance account via Google/Apple unique authentication mechanism, Google/Apple may ask you to share information with EVO Human Performance. If you choose to share information, Google/Apple will usually ask you to specify what information you want to share.

## **7.2. Social media plug-ins**

Social media plug-ins may be present on the App. By clicking on one of these buttons (for example Facebook's "Share" button), information is exchanged with the social media site concerned. If you are connected to the social media site at the same time, information may be relayed to your account by the social media site. This social media site can also display it on your profile and share it with other members of your network.

## **8. PROCEDURES FOR SECURITY AND PROTECTION OF PERSONAL DATA**

In order to ensure the protection and confidentiality of the Personal Data communicated to us, we use the technical, physical and procedural control measures that are implemented during the collection, processing and transfer of your Personal Data. As such, we have put in place various measures, including pseudonymization, encryption, access and retention policies.

We also apply security procedures limiting the use and access to your Personal Data on our servers. Only authorized personnel are permitted, in the course of their work, to access your Personal Data.

## **9. MANAGEMENT OF PERSONAL DATA OF MINORS**

In accordance with Regulation on Personal Data, the collection of Personal Data of a child under sixteen (16) is permitted only with the valid consent of the person who has parental authority. If you are under the age of sixteen (16) and do not have the consent of your parent or legal guardian, please do not provide any Personal Data. If we learn that we have collected the Personal Data of a child under the age of sixteen (16) without the valid consent of the parent or legal guardian, we will remove them unless otherwise agreed by the parent or legal guardian.

## **10. INFORMATION ON BANKING DATA**

For the purpose of paying for orders, bank details are collected and kept by our service providers in terms of payment. These comply with the PCI-DSS requirements, an international security standard whose objectives are to ensure the confidentiality and integrity of cardholder data, and thus secure the protection of card and transaction data.

## 11. COOKIE INFORMATION

**Technical cookies that make the Website working:** they are indispensable and allow you to use the basic functionalities of the Website. These cookies allow you especially to: navigate on the Website in a secure way, add products in your purchasing basket. These cookies are always activated on the Website. Personal data collected is: IP address. The data controller is: EVO Human Performance.

**Web analytics cookies:** they allow us to collect information on the way people browse our Website, like the number of people browsing the Website or the more visited webpages. We use this information to make sure people browsing the Website find appropriate content, measure performance indicators of the Website, identify error messages for solving bugs. These cookies are used by EVO Human Performance. If you don't accept these cookies, we won't be informed of your visit to our Website. The consent for using these cookies is valid for 6 months. Personal data collected is user ID determined in a random way. The data controller is EVO Human Performance.

**Performance cookies:** these cookies allow us to see if people scrolled down the screen and where they clicked on the site. These cookies are used by EVO Human Performance. The consent for using these cookies is valid for 6 months. Personal data collected are the device's IP address and user ID. The data controller is EVO Human Performance.



**Third party cookies linked to web views in the App:** when opening web views from an App, the third-party website you access may use cookies. We invite you to read the cookies policy of these third-party websites to gain knowledge of the use aims of the information they collect.

## 12. AMENDMENT OF OUR POLICY

It may be the case that we have to make changes to this Policy. We advise you to regularly consult the page dedicated to the collection and processing of Personal Data on the Website to be aware of any changes or updates to our Policy.

## 13. CONTACT US

If you have any questions relating to this Policy or any requests relating to your Personal Data and/or you wish to exercise your rights, you can contact us (i) via the following email address: [dpo@evo4hp.com](mailto:dpo@evo4hp.com); or (ii) by post to EVO Human Performance PC, Grammou, 10, 15127 Melissia (Greece). In accordance with the regulations in force, your application must be signed and accompanied by a photocopy of an identity card bearing your signature and provide the address to which we must send you our response.

APPENDIX 1 - AIMS OF PROCESSES UNDERTAKEN BY EVO HUMAN PERFORMANCE.

AIMS	DATA TYPES	PERIOD OF RETENTION	APPS/SITE
Creation of an EVO Human Performance Cloud account	Name, surname, email, Date of birth	2 years from the last account use	evo4hp.com
Online order management (purchases on the Website)	Name, surname, email, billing and delivery address	2 years since the last customer order.	evo4hp.com
Management of the existing/prospective customer database. Marketing Activities	Name, surname, email, billing and delivery address	2 years from the last action of the existing/prospective customer	evo4hp.com
Contact after-sales services	Name, surname, email, address, phone number. Serial number of the product	2 years from the closure of the last case.	evo4hp.com
Products and services improvement	User's email, serial number of the product	2 years from the last account use	evo4hp.com
Following activation statistics	IP address of the network connection, type of terminal.	2 years from the last account use	evo4hp.com

APPENDIX 2 - THIRD PARTY ACTING ON THE WEBSITE.

AIMS	DATA TYPES	PERIOD OF RETENTION	APPS/SITE
Payment online (purchases on the Website)	See third-party website	See third-party website	PayPal
Web analytics cookies	User ID chosen randomly by Google Analytics	1 year	Google Analytics
Performance cookies	Device's IP address, user ID	1 year	.....
Tracking tools of the after sales services open cases	Name, surname, email, address, phone number. Serial number of the product.	2 years	Salesforce
Tag management	No Personal Data	Not applicable	Google Tag Manager