

PM-International's Data Privacy Policy

NOTES ON DATA PROTECTION

The following privacy policy applies to the website available at www.pm-international.com and to the processing of your personal data as a customer or Team Partner of PM-International.

The protection of your personal data and your privacy are important to us.

For this reason, we would like to explain below what PM-International does to do justice to you and us in this respect. We would like to explain what personal data we collect, how we use it and how we protect your data. You will also find out who we will pass this data on to and how you can have your data changed. PM-International's data protection policy is in accordance with the applicable legal provisions of the local applicable law and the provisions of the Digital Personal Data Protection Act, 2023 (The DPDP Act, 2023) along with the Information Technology Act, 2000, specifically the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 (SPDI Rules, 2011), and other applicable Indian regulations as amended from time to time (collectively referred to as "applicable laws") This data privacy policy explains which data is stored by PM-International and how it is used.

Note: Please read this Privacy Policy along with any other document issued by PM-International in this regard, carefully before providing your consent. Together, these documents form an integrated part of our terms and govern the collection, use, and protection of your personal data. By consenting, you agree that these documents are applicable to you in full.

NAME AND CONTACT DETAILS OF THE DATA CONTROLLERS AND, IF APPLICABLE, THEIR REPRESENTATIVE:

PM-International India Private Limited

6th Floor, Suite No. 10 and 11, Apeejay Business Centre, Arunachal Building, Barakhamba Road, Central Delhi, New Delhi, Delhi, India, 110001

Represented by Kunal Verma and Christian Brix

Phone: 011-41241405

E-mail : contact@pm-international.co.in

PM-International Singapore Nutrition Pte Ltd.

114 Lavender Street

#06-72/73 CT Hub 2

Singapore 338729

DID + 65 6462 2512

office@pm-international.sg

DATA PROTECTION OFFICER (DPO):

Hartwig Bauer

DPO@PM-International.com

PURPOSES FOR WHICH THE PERSONAL DATA ARE TO BE PROCESSED:

We process your data for the following purposes:

- Contract processing
- Contact us (for inquiries via contact form)
- Advertising
- Quality assurance
- Statistics.

LEGAL BASIS FOR THE PROCESSING

Your data is processed in compliance with applicable Indian laws on privacy and data protection, including the Information Technology Act, 2000, the SPDI Rules, and the Digital Personal Data Protection Act, 2023 The legal basis includes:

1. Your Consent

Data is processed with your explicit consent, as required under Section 4, 5 and 6 of The DPDP Act, 2023 and Rule 5 of the SPDI Rules, 2011, which mandate obtaining consent for the collection, use, and disclosure of sensitive personal data or information.

2. Fulfilment of a Contract

Rule 6 of the SPDI Rules, 2011 Data is processed where it is necessary for the performance of a contract to which you are a party.

3. Legitimate Interests

Section 7(d) of the DPDP Act, 2023 and Rule 6 of the SPDI Rules, 2011 Data is processed to pursue legitimate interests, including ensuring the safety and security of services, detecting fraud, or for lawful business purposes, provided such processing does not override your fundamental rights and freedoms as guaranteed under the Constitution of India.

Your data is processed on the following legal basis:

LEGITIMATE INTERESTS

We pursue the following legitimate interests when processing your data:

- Improvement of our offer
- Protection against misuse and infringements
- Ensuring fair competition
- Statistics
- Direct advertising.

RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE PERSONAL DATA

When processing your data, we work together with the following service providers who have access to your data:

- Web hosting provider
- Provider of social media platforms
- Advertising networks (for advertisements)
- payment and shipping service provider
- Provider of web analysis tools
- Service provider in the field of compliance and online monitoring of industrial property rights.

DURATION FOR WHICH THE PERSONAL DATA IS STORED:

We store your data,

- if you have consented to the processing, at most until you withdraw your consent,
- if we require the data for the performance of a contract, at most for as long as the contractual relationship with you exists or statutory retention periods apply,
- if we use the data on the basis of a legitimate interest, at most as long as your interest in deletion or anonymization does not prevail.

DATA SOURCES

We receive the data from you (including about the devices you use).

DATA TRANSFER TO THIRD COUNTRIES

Data is transferred to third countries outside India which can be restricted by the Central Government as per Section 16 of The DPDP Act, 2023. This takes place on the basis of contractual regulations provided for by law, which are intended to ensure adequate protection of your data and which you can view on request.

RIGHT OF ACCESS, RECTIFICATION OR ERASURE OR RESTRICTION OF PROCESSING OR THE RIGHT TO OBJECT TO PROCESSING AND THE RIGHT TO DATA PORTABILITY:

You have the right,

- to request information about the processing of your data,
- to correct your data,
- to have your data deleted or blocked,
- to have the processing restricted,
- to object to the processing of your data,
- to receive your data in a transferable format and to transmit it to a third party,
- to withdraw your consent to the processing of your data for the future and
- to complain to the competent supervisory authority about unauthorized data processing. The competent supervisory authority is the Data Protection Board of India as established by the provisions laid down under Section 18 of the DPDP Act, 2023.

REQUIREMENT OR OBLIGATION TO PROVIDE DATA

Unless expressly stated at the time of collection, the provision of data is not required or mandatory.

Further information on data protection

DATA PROCESSING BY THIRD PARTIES

If PM-International passes on data to service providers (such as parcel service providers, payment service providers, etc.) in the context of sales management, PM-International concludes order processing contracts in each case. As a result, sales partners are not only bound to data protection by law, but also by contract with PM-International.

Personal and transaction-related data is transferred in accordance with the Rule 5 of the SPDI Rules, 2011

DATA PROTECTION FOR GOODS ORDERS, PERSONAL USER PROFILES

When ordering goods, PM-International collects personal data from customers in order to process and fulfill the order. The following customer data is collected, stored and used: Name, address, e-mail address, date of birth, telephone number, payment information and, in the case of payment by direct debit, the account details information and, if applicable, further bank details for credit card payments. The information you provide here is used exclusively to simplify your order process, for administrative purposes and for internal analysis. The legal basis for this processing of your personal data is Section 4, 7 and 11 of the DPDP Act, 2023 and Rule 5 of the SPDI Rules, 2011 and is carried out for the purpose of fulfilling a contract concluded with you or for carrying out necessary, pre-contractual measures that are carried out at your request.

PM-INTERNATIONAL USES YOUR DATA FOR THE FOLLOWING PROCESSES:

- To use the information stored in your user profile to offer you the possibilities of a customized service and the optimal use of our website.
- To send you individual offers and information that are of personal interest to you. Of course, you also have the option of informing us that you do not wish to receive such offers and/or information or no longer wish to receive them. We will of course comply with this. Please send an e-mail to the e-mail address of our DPO figuring on the first page.

For the delivery of the goods by external service providers, PM-International passes on the necessary information (recipient, delivery address and, if applicable, persons authorized to receive the goods) to these companies and to members of the PM Group of companies in order to fulfill the contractual obligations Rule 6 of the SPDI Rules, 2011. PM-International does not engage in any address marketing. PM-International concludes data processing agreements with all external service providers that meet the requirements of Section 8 and 11 of The DPDP Act, 2023.

You can revoke your consent at any time by clicking "unsubscribe here" at the end of a parcel information email. After revocation, we will delete your data provided for this purpose, unless you have expressly consented to further use of your data or we reserve the right to use data beyond this, which is permitted by law and about which we inform you in this declaration.

The data of the individual orders remain accessible in the password-protected user account of this website for the respective customer, in particular to enable follow-up orders of the products already purchased in the ordering system in a simple manner. The customer can view and change the inventory data stored for his customer account as well as the selected password at any time on this website in his user account – there in the "My data" section.

A customer can have their customer account and all associated data deleted at any time by sending a message by mail, telephone or e-mail to the e-mail address of our DPO figuring on the first page. In this case, PM-International will immediately delete all your customer data, unless their use is still necessary for the processing of an order or PM-International is obliged to store them due to applicable law. In both cases, however, the data will be blocked and deleted as soon as possible.

SPECIAL VERSIONS FOR TEAM PARTNERS

In the event that you are or wish to become a Team Partner of PM-International, we process the following personal data for the conclusion and execution of a contract as a Team Partner:

Personal data:

- Company
- first name
- last name
- full address
- date of birth

Contact details:

- telephone number(s) Landline
- mobile phone number(s)
- fax number
- e-mail address(es)
- website

Necessary data for possible commission payments

- Note on VAT authorization ("VAT-authorized" or "small business owner")
- Sales tax ID number
- IBAN
- BIC
- account holder
- name of the bank
- credit card data
- Any other mandatory information in connection with possible commission payments.

Other data relating to the activity as a Team Partner:

- distributor number assigned by PM-International
- date of commencement of activity as a Team Partner with PM-International
- achieved and subsequent rank according to the achievable career levels in the PM-International Marketing Plan
- if applicable, complete shipping address different from the address
- any other mandatory information in connection with an activity as a Team Partner
- sponsor
- recommendation
- information on orders placed
- turnover and sales statistics
- Contact data (name, address, e-mail) of the customers in the Team Partner's downline

Should the Team Partner obtain a management position or wish to act as a sponsor or manager, their name and contact details will be published and passed on within the team.

The Team Partner's data is also passed on to the respective organizational head (manager) so that he or she can view the data for the entire structure (downline).

This data processing is necessary to establish and execute the contract as a Team Partner, in particular to process commission payments and to implement the sales structure. Section 4, 7 and 11 of the DPDP Act, 2023 and Rule 5 of the SPDI Rules, 2011

Recipients or categories of recipients of the personal data:

When processing your data, we work together with the recipients of data (service providers) named above. In addition, we also transmit your data to other members of the PM Group of companies for the purpose of contract processing.

Finally, your following personal data will be transferred to our compliance and online IP monitoring service provider, Momentum Factor, 4801 Spicewood Springs Rd, Suite #250, Austin, TX 78759, USA, if you have received commissions from PM-International as a so-called "Business Builder" in the previous 3 months or have sponsored a new distributor for PM-International:

- PM customer number
- first name
- last name
- e-mail address
- phone number
- country, federal state
- sponsor customer number

The purpose of data transmission to MomentumFactor is to ensure fair competition, to protect PM-International from fraudulent activity and thus to limit PM-International's (joint) liability, in particular in connection with prohibited product claims. For these purposes, MomentumFactor uses automated procedures to identify violations by Team Partners of contractual agreements with PM-International and of statutory provisions in the area of competition law. The legal basis for this data processing is Art. 6 para. 1 sentence 1 lit. f) GDPR.

The data is shared automatically, in a regular cycle, between the PM-International database and MomentumFactor. The services at MomentumFactor are stored in an Amazon Web Services cloud in the USA. The data is deleted from our database in accordance with our deletion procedure and subsequently also from MomentumFactor.

The contractual basis for the transfer of personal data is the service contract and the order processing agreement between PM-International and MomentumFactor. In addition, the data transfer to MomentumFactor is based on the relevant EU standard contractual clauses for the transfer of personal data to third countries. MomentumFactor is compliant (officially certified) according to the GDPR. MomentumFactor's infrastructure, organization, product and internal security as well as data security and data protection are externally monitored and audited.

Further information on the processing of personal data by MomentumFactor can be found here: <https://momofactor.com/privacy-policy/>.

NEWSLETTER

If you have subscribed to the PM-International newsletter, PM-International will process your personal data that you have provided to us in order to inform you about news. You agree that the newsletter will be sent regularly to the e-mail address provided. Prior to this, we will check that the owner of the e-mail address provided agrees to receive the newsletter.

PM-International uses a processor to manage the address data and to send the newsletter. The service provider only has access to the personal information required to fulfill the order. The address data will not be used for other purposes by the service provider or by PM-International itself. PM-International concludes a corresponding order processing contract with the service provider, which complies with the requirements of Section 8 and 11 of The DPDP Act, 2023

The legal basis for the processing of your personal data in connection with the transmission of our newsletter is Section 4, 7 and 11 of the DPDP Act, 2023 and Rule 5 of the SPDI Rules, 2011 in conjunction with your consent.

If you would like to revoke your consent to receive newsletters, simply deactivate the newsletter function in your personal area as a sales partner with e-business. All others please send an e-mail to the e-mail address of our DPO figuring on the first page.

CONTACT FORM

The contact form on our website is an easy way to get in touch with us quickly. To make it possible to contact us, some fields are marked as mandatory. If you fill in the fields and select "Send", you agree that your data will be sent to us with the message by e-mail. The data will not be stored on the web server. The data will be stored by us for 10 years and then deleted.

The legal basis for the processing of your personal data in connection with communication via our contact form is Section 4, 7 and 11 of the DPDP Act, 2023 and Rule 5 of the SPDI Rules, 2011 . GDPR in conjunction with your consent.

AUTOMATIC STORAGE OF ACCESS DATA

- Every time a user accesses the PM-International website, the access data of the process is automatically stored in a log file. This is general information, such as the page from which the file was requested, the name of the retrieved file, the date and time of access, the amount of data transferred, the protocol used and the descriptions sent by the Internet browser and, if applicable, the operating system.
- This general information is anonymized, i.e. it is not stored together with any personal data you may have provided to PM-International and is not merged with it in any other way. It is only analyzed for statistical purposes and used to improve the content and functionality of the website. This data is not passed on to third parties for other non-commercial or commercial purposes. Access data is stored in the log file for a maximum of 4 weeks.

COOKIES

This website also uses so-called cookies. A cookie is a text file with an identification number that is transmitted to the user's computer together with the other data actually requested when the website is used and stored there. The file is stored there for later access and serves to authenticate the user.

Since cookies are only simple files and not executable programs, they do not pose any danger to the computer. Cookies do not contain any personal data, so that the protection of privacy is guaranteed. Depending on the settings selected by the user, the Internet browser automatically accepts cookies. However, this setting can be changed and the storage of cookies deactivated or set in such a way that the user is notified as soon as a cookie is set. However, if the use of cookies is deactivated, some functions of the website may not be available or may only be available to a limited extent.

In order to determine user behavior on the PM-International website, we examine how you as a customer reach our website. This information is collected through the use of cookies (further information can be found under web analysis further down in the text). However, no personal data (data through which it is possible to deduce your identity) is collected in this process. With this anonymized procedure, it is not possible to assign the respective user behavior to a specific person.

We use the following cookies on our website, name (with description) and expiration date:

Google Analytics cookies:

- _ga (to distinguish users) – Expiry date: 2 years
- _gid (to differentiate between users) – Expiry date: 24 hours
- _gat (to throttle the request rate) – Expiry date: 1 minute

Telemetry cookies:

- ai_user (performance cookie for telemetry correlation) – expiration: 1 year
- ai_session (session cookie for telemetry correlation) – expiry: 30 min.

PHPSESSID: (session cookie for tracking the session) – Expiry date: session duration

SERVERID: (session cookie for performance tuning) – Expiry date: session duration

TP: (to distinguish registered users) – Expiry date: 1 year

In addition, we have cookies that suggest which language and country is most appropriate for your visit. These are based on the URL you use and do not store any personal information:

wp-wpml_current_language (WPML cookie for the selected language) – Expiry date: 1 day

language_preference_options (cookie for current language and country) – expiration date: 1 year

language_redirect (cookie for information on whether the user has been redirected) – expiry: 1 day

If you do not want your access device to be recognized by storing cookies, you can set the browser you are using to block cookies, delete them from your hard drive or warn you before a cookie is stored. Most browsers have an option that restricts or completely prevents the storage of cookies. However, we would like to point out that in this case you may not be able to use all the functions of our website to their full extent.

SOCIAL NETWORKS

We use plugins from various social networks on our website.

FACEBOOK

This website uses the Share button from the social network Facebook.

Facebook is operated by Meta Platforms, Inc., Willow Road 1601, 94025 Menlo Park, CA, USA and is available at www.facebook.de. These individual social plugins are identified by one of the Facebook logos or with the addition "Facebook Social Plugin". A list of the appearance and functions of the individual plugins can be viewed here: developers.facebook.com/docs/plugin. When you visit a page on our website that contains such a social plugin, the browser you are using establishes a direct connection to the servers of Meta Platforms, Inc. The content of the social plugin is transmitted by Meta Platforms, Inc. directly to your browser, which integrates it into the website. We therefore have no influence on the scope of the data that Meta Platforms, Inc. collects with the help of the social plugins and therefore inform you according to our level of knowledge: Due to the integration of the social plugins, Meta Platforms, Inc. is informed that you have visited the corresponding page of our website, even if you are not registered as a Facebook user or are not currently logged in to Facebook. This information, together with your IP address, is transmitted from your browser to a Meta Platforms, Inc. server in the USA and stored there. According to the information provided by Meta Platforms, Inc., only an anonymized IP address is stored for non-registered users in Germany. If you are logged in to Facebook, Meta Platforms, Inc. can associate your visit to our website directly with your Facebook account. Meta Platforms, Inc. receives the information about your visit to our website regardless of whether you interact with the social plugins or not. If you interact with the social plugins, for example by clicking the "Like" button or leaving a comment, the corresponding information is transmitted directly from your browser to Meta Platforms, Inc. and stored there. The information is also published on Facebook and displayed to your Facebook friends. The purpose and scope of the data collection and the further processing and use of the data by Meta Platforms, Inc. as well as your rights in this regard and setting options to protect your privacy can be found in the Meta Platforms, Inc. privacy policy, which is available at www.facebook.com/about/privacy. If you are a registered Facebook user and do not want Meta Platforms, Inc. to collect data about you via our website and link it to your membership data stored on Facebook, you must log out of Facebook before visiting our website. It is also possible to block the social plugins with add-ons for your browser, e.g. with the Facebook Blocker, webgraph.com/resources/facebookblocker.

YOUTUBE

This website uses plugins from Youtube.com, which are operated by Youtube, LLC, 901 Cherry Avenue, San Bruno, CA 94066, USA. When a user accesses a website that contains such a plugin, their browser establishes a direct connection with the YouTube servers. This tells the YouTube server which of the websites the user has visited. If you are logged in to YouTube as a member, YouTube assigns this information to your personal user accounts on these platforms. When using these plugins, e.g. clicking/starting a video or sending a comment, this information is assigned to your YouTube user account, which you can only prevent by logging out before using the plugin. Further information on this can be found in the privacy policy at www.google.de/intl/de/policies/privacy.

"X" (FORMERLY TWITTER)

This website uses the buttons of the X service, which is offered by X Corp, 1355 Market St, Suite 900, San Francisco, CA 94103, USA. These plugins can be recognized by terms such as the X logo. Among other things, they make it possible to share a post or a page of this website on X. When a user accesses

a website that contains such a button, their browser establishes a direct connection with the X Corp. servers. The content of the X buttons is transmitted by X Corp. directly to the user's browser. We therefore have no influence on the scope of the data that X Corp. collects with the help of this plugin and can therefore only inform the user according to our level of knowledge: According to this, log data such as the user's IP address, the previously accessed website, etc. are transmitted. Further information on this can be found in Twitter's privacy policy at <https://twitter.com/en/privacy>.

LINKEDIN

Plugins from LinkedIn Corporation, 209 Stierlin Court, Mountain View, CA 94043, USA (hereinafter "LinkedIn") are integrated on this website. You can recognize the LinkedIn plugins by the LinkedIn logo or the "Share" button ("Recommend") on this website. When you visit this website, a direct connection is established between your browser and the LinkedIn server via the plugin. LinkedIn receives the information that you have visited this website with your IP address. If you click on the LinkedIn "Share button" while you are logged into your LinkedIn account, you can link the content of this website to your LinkedIn profile. This allows LinkedIn to associate your visit to this website with your user account. We would like to point out that, as the website operator, we have no knowledge of the content of the transmitted data or its use by LinkedIn. Details on data collection (purpose, scope, further processing, use) as well as your rights and settings options can be found in LinkedIn's privacy policy. LinkedIn provides this information at www.linkedin.com/legal/privacy-policy.

WEB ANALYSIS

Like almost every website operator, we use analysis tools in the form of tracking software to determine the frequency of use and the number of users of our website.

USE OF THE ANALYSIS TOOL "GOOGLE ANALYTICS"

PM-International uses the Google Analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. This service enables the use of this website to be analyzed and uses cookies for this purpose. For this purpose, the information generated by the cookie, such as your anonymized IP address, is transferred to a Google LLC server in the USA on behalf of PM-International, where it is stored and evaluated. Google Analytics has been extended on this website by the code "gat._anonymizeIp();" This ensures anonymized collection of IP addresses. The anonymization of your IP address is usually carried out by Google LLC within the European Union or in other contracting states of the European Economic Area (EEA) by shortening your IP address. In exceptional cases, your IP address is transmitted to a Google LLC server in the USA and only anonymized there. Your IP address transmitted in this way will not be merged with other data from Google LLC. Remarketing and reports on performance according to demographic characteristics and interests are used as part of the Google Analytics advertising function. The purpose of these procedures is to use information about user behavior to align advertising measures more closely with the interests of the respective users. As part of remarketing, personalized advertising can be placed on other websites based on your surfing behavior on the PM-International website. The advertising material may contain products that you have previously viewed on the PM-International website. If you have consented to Google linking your web and app browsing history to your Google account and using information from your Google account to personalize ads, Google will use this data for cross-device remarketing. You can object to the collection of your data by Google Analytics at any time. You have the following options for doing so:

Most browsers accept cookies automatically. However, you can prevent the use of cookies by setting your browser accordingly; in this case, however, you may not be able to use all the functions of the website. The settings must be made separately for each browser used.

You can also prevent the collection and processing of this data by Google LLC by downloading and installing the browser add-on available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=de>

Alternatively, or within browsers on mobile devices, this can be done by clicking on the following link:

MANAGE CONSENT

An opt-out cookie is stored on the user device for PM-International websites with effect for the browser currently in use. If the cookies are deleted in this browser, this link must be clicked again.

Further information on terms of use and data protection can be found at <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage> or at <http://www.google.com/analytics/terms/de.html> or <https://www.google.de/intl/de/policies/>.

Please note: If you delete your cookies in the browser, the stored opt-out cookie will also be deleted and the objection may have to be made again in the aforementioned manner.

MICROSOFT INSIGHTS

We use the Microsoft application "Insights" for telemetry investigations. Insights supports distributed telemetry correlation, which allows us to identify which components are responsible for errors or performance degradation.

(Detailed information can be found at <https://docs.microsoft.com/en-us/azure/azure-monitor/app/data-retention-privacy>)

AUTOMATED DECISION-MAKING/PROFILING

We do not use automated decision-making that produces legal effects concerning you or adversely affects you.

DATA SECURITY

The SSL (Secure Socket Layer) security software used by PM-International is currently one of the best technologies available.

When paying for the respective service, you have the option of choosing between various payment options. With each option, your payment details are encrypted for transmission. This means you can be sure that your data cannot be read by a third party. This transmission is therefore much more secure than transmitting your personal data over the phone.

For PM-International, security is not just about protecting your data on the payment method you choose. PM-International will make every effort to ensure that your order documents, goods or other documents reach you exactly at the time we have sent them to you.

PM-International may amend this Data Privacy Policy from time to time as it deems necessary or appropriate.

DATE December 2024