

Data Protection Policy

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I. General information

DATA OF SERVICE PROVIDER (later used as Flavon):

Name: Flavon International Ltd

Head quarter: 305 Neasden Lane, London, NW10 1QR, United Kingdom

Company ID: 09916668

Director: Mr. Laszlo Gaal (Jr.)

E-mail address: london@flavongroup.com

Central phone number: +44 20 8452 2993

Information Commissioner's Office registration reference: ZA182089

Registered in England and Wales.

This document includes the rights, liabilities and important information in relation to all services provided by Flavon company group through the website www.flavongroup.com (online platform).

II. Data Protection

II.1. Data protection

II.1.1. Registration

Flavon sells its products via MLM (multi-level marketing), therefore purchasing these products is possible only by joining the network.

During registration the person concerned (data subject), as a natural person, is required to fill out Flavon's Membership Agreement, providing the following data:

Data category	Purpose of data processing	Legal basis of data processing	Period of storage	Data transfer
Name	Communication and identification	Accounting regulations and fulfilment of agreement	6 years from the last day of tax year of the last invoice	External software developer
E-mail address	Communication	Fulfilment of agreement	5 years after the end of the agreement	
Phone number	Communication	Fulfilment of agreement		
Invoicing address	Fulfilment of invoicing obligation	Fulfilment of legal obligation	6 years after the last day of tax year of the last invoice	

II.1.2. Product purchase by registered Members

If the data subject is already a registered member, they shall fill out a "Product order form" providing the following data as a natural person:

Data category	Purpose of data processing	Legal basis of data processing	Period of storage	Data transfer
Name	Communication and identification	Accounting regulations and fulfilment of agreement	6 years after the last day of tax year of the last invoice	External software developer
Invoicing address	Fulfilling the invoicing obligation	Fulfilment of legal obligation	6 years after the last day of tax year of the last invoice	
Flavon ID number	Identification of the concerned Member in the system	Fulfilment of agreement	1 year after the last purchase	

II.1.3. Ordering business cards

If the data subject is already a registered member, they can order standard Flavon business cards, the following personal data are needed:

Data category	Purpose of data processing	Legal basis of data processing	Period of storage	Data transfer
Name	Communication and identification; data is displayed on the business card	Fulfilment of agreement	1 year after the last purchase	Ceze Kft. (4225 Debrecen, Vállalkozók útja 1. Company register number: 09 09 007054 Tax number: 11956541-2-09)
E-mail address				
Phone number				
Flavon ID number	Identifying the concerned Member in the system and displayed on the business card			

II.1.4. Ordering vehicle stickers

If the data subject is already a registered member, they can order Flavon stickers for vehicles, the following personal data are needed:

Data category	Purpose of data processing	Legal basis of data processing	Period of storage	Data transfer
Name	Communication and identification	Fulfilment of agreement	1 year after the last purchase	Ceze Kft. (4225 Debrecen, Vállalkozók útja 1. Company register number: 09 09 007054 Tax number: 11956541-2-09)
Flavon ID number	Identifying the concerned Member in the system			

II.2. Data transfer

- Flavon transfers Members' name, assigned ID number and purchases to other Flavon members (20 upline sponsors) for the purpose of recording commission-, bonus-, payback data related to the business activity, which serves as the basis of commission payout for every Member, thus they need to be included in the commission reports.
- At registration Members may allow Flavon to give his/her personal details submitted at registration to his/her 3 upline sponsors with the purpose of communication, successful networking.
- Flavon company group carries our economic activity in and outside of the European Union, thus it is possible that on the upline of the registered Member there is a non-EU national. In this case the non-EU national may be a member of a Flavon company group, which is based in a third country (USA). European Commission acknowledged the appropriate protection level of the United States. ([EC list](#))
- Flavon's external hosting service provider is Flavon Group Kft.
Flavon delegates book keeping tasks to the following partners:

- regarding Flavon's Swedish operation the book keeping tasks are managed by 1Office AB
- regarding Flavon's Swiss operation the book keeping tasks are managed by Gaapex Sàrl
- regarding Flavon's German operation the book keeping tasks are managed by CCC Deutschland
thus for this purpose the personal details appearing on Flavon's sales invoices are transferred to them.
- Griff Consulting Services Ltd. manages the company's accounting tasks, thus for this purpose the personal details appearing on Flavon's invoices, documentation of expenditures and account statements are transferred to them.

Flavon uses delivery service providers thus for this purpose the following details are transferred to them:

- name, address, phone number and details of the orders to Fiege Logistik Schweiz AG delivering packages in Switzerland,
 - name, address, phone number and details of the orders to 360 Logistics AS delivering packages in Norway,
 - name, address, phone number, email address and details of the orders to UPS Hungary Ltd. delivering packages in other countries.
- e) COMPACT SZOFTVER Kft (address: 4031 Debrecen, Kishegyesi út 154; company register number: 09-09-016823, tax number: 14744459-2-09), as the owner of the software Flavon uses may access the data stored in the software with the purpose of software maintenance and development.

II.3. Member's rights during data processing

II.3.1. Erasure of data

The Member may (in person or in writing) ask Flavon for erasure of those personal data without undue delay, that is processed as not part of the contractual relationship with the Member, or that is processed as not part of a compliance of a legal obligation and if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based on and where there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- the personal data have been collected in relation to the offer of information society services.

II.3.2. Asking for information

Members have the right to **ask for information** at any time from Flavon in person or in writing regarding the processing of his/her personal data and get information about the method of data

processing. Members may require Flavon at any time to provide access to his/her personal data. Flavon fulfils this obligation through the Back Office.

II.3.3. Confirmation

The Member shall have the right to obtain confirmation from Flavon as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source.

II.3.4. The Member's right to access

By operating Back Office Flavon provides the Members access to the personal data that is processed.

II.3.5. Right to rectification

The Member shall have the right to obtain from Flavon without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the Member shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. Members can exercise this right via Back Office or by calling the customer service.

II.3.6. Right to restriction of processing

The Member shall have the right to obtain restriction of processing from Flavon where one of the following applies:

- the accuracy of the personal data is contested by the Member, for a period enabling Flavon to verify the accuracy of the personal data;
- the processing is unlawful but Flavon opposes the erasure of the personal data and requests the restriction of their use instead;
- Flavon no longer needs the personal data for the purposes of the processing, but they are required by the Member for the establishment, exercise or defence of legal claims;
- the Member has objected to processing; in this case the period of restriction is covers the time while it is verified whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the Member's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

A Member who has obtained restriction of processing shall be informed by Flavon before the restriction of processing is lifted.

II.3.7. Right to object

The Member shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her in case of:

- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Flavon;
- processing is necessary for the purposes of the legitimate interests pursued by Flavon or by a third party,

except where such interests are overridden by the interests or fundamental rights and freedoms of the Member which require protection of personal data.

Flavon shall no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Member or for the establishment, exercise or defence of legal claims.

The processing of personal data provided by the Member to Flavon for purposes other than those for which the personal data were initially collected should be allowed only where the processing is compatible with the purposes for which the personal data were initially collected.

The Member may request Flavon at any time, free of charge the modification, erasure of his/her personal data, may object to the processing of his/her data, and may request access to these data. Flavon shall without undue delay, but in at least 1 month answer the Member's letter and fulfil his/her request in case it is compatible with the Member's rights set out in the corresponding regulations.

The Member may request Flavon at any time to get to know and obtain communication in particular with regard to the purposes for which the personal data are processed, where possible the period for which the personal data are processed, the recipients of the personal data, the logic involved in any automatic personal data processing and, at least when based on profiling, the consequences of such processing.

II.3.8. Right to data portability

The Member shall have the right to receive the personal data concerning him or her in a commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from Flavon, in case of the data processing is based on the Member's consent or on a contract and the processing is carried out by automated means. The Member shall have the right to have Flavon transmitting his/her personal data directly to another data controller. This right of the Member shall not apply to processing necessary for the performance of a task carried out in

the public interest or in the exercise of official authority vested in the controller, and this right shall not affect the rights and freedoms of others.

II.4. Complaint against data processing

The Member shall have the right to submit a complaint against data processing to Flavon or directly to the supervisory authorities at any time. If the Member contacts Flavon firstly with his/her complaint, Flavon shall investigate the content and reason of the complaint in every case and shall make its remarks in 15 days.

The Member may submit his/her objections regarding the service or activities of Flavon in the following way: mailing address: 305 Neasden Lane, London, NW10 1QR, United Kingdom, or electronically – email address: dataprotection@flavongroup.com.

Flavon will remedy verbal complaints immediately, provided it is able to do so. If it is not possible to immediately remedy the verbal complaint due to the nature of the complaint, or if the Member does not agree with the management of the complaint, Flavon will record a report on the complaint – which it will retain for five years together with its substantial response. Flavon is obliged to hand over to the Member one copy of the report on the verbal complaint personally (in the office), or if this is not possible, then it is obliged to act according to the rules that refer to written complaints detailed below. Flavon, in the case of a verbal complaint that is communicated through phone or through another electronic telecommunication service, will send the Member the duplicate copy of the report at the latest simultaneously with its substantial response. In all other cases Flavon shall act according to the rules that refer to written complaints. In the case of a complaint that is recorded with the aid of a phone or another means of telecommunication, Flavon will attach an ID to the complaint, which will simplify later on the retrieval of the complaint. Flavon will substantially answer in writing complaints it receives, within 15 days. Taking the relevant step according to this agreement means submitting it to the post. If the complaint is refused, Flavon shall inform the Member about the reason of refusal.

If Flavon does not accept the complaint or the Member does not wish to submit a complaint to Flavon, they shall have the right to directly turn to The Information Commissioner's Office (Water Lane, Wycliffe House Wilmslow – Cheshire SK9 5AF) with their complaint, and to request judicial remedy.

II.5. Measures of data protection

Flavon shall process the received personal data in a confidential manner in accordance with the provisions of GDPR as well as the national regulations.

Flavon keeps in mind the following principles regarding personal data processing:

- Lawfulness, fairness and transparency: personal data shall be processed lawfully, fairly and in a transparent manner in relation to the Member;
- Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Accuracy: personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

- **Storage limitation:** Personal data shall be kept in a form which permits identification of Members for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, it is subject to implementation of the appropriate technical and organisational measures required by the regulation in order to safeguard the rights and freedoms of the Member;
- **Integrity and confidentiality:** personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;
- **Accountability:** Flavon shall be responsible for, and be able to demonstrate compliance with these principles.

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, Flavon shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

Flavon does not adhere to approved codes of conduct or approved GDPR certification mechanisms.

II.6. Newsletter, E-DM

The e-mails that Flavon sends to the Members contain only those information that are necessary because of the legal relationship, product purchase, the operation of Flavon's system, organized events or other important information. Thus Flavon sends no newsletters to anyone.

II.7. Managing breach of personal data

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

As soon as Flavon becomes aware that a personal data breach has occurred regarding any aspects of the personal data it processes, the company shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the competent supervisory authority, unless Flavon is able to demonstrate, in accordance with the accountability principle, that the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

Where such notification to the supervisory authority cannot be made within 72 hours, the reasons for the delay should accompany the notification and information may be provided in phases without undue further delay. Flavon communicates to the data subject a personal data breach, without

undue delay, where that personal data breach is likely to result in a high risk to the rights and freedoms of the natural person in order to allow him or her to take the necessary precautions. The communication made by Flavon describes the nature of the personal data breach as well as recommendations for the natural person concerned to mitigate potential adverse effects.

After Flavon becomes aware of a personal data breach, Flavon ascertains whether all appropriate technological protection and organisational measures have been implemented to establish immediately whether a personal data breach has taken place and to inform promptly the supervisory authority and the data subject. To this end, the director, as the representative of Flavon, summons the members, all people processing data, as well as the external IT expert in 24 hours after the incident to determine the cause, to create action plans about the performed and upcoming tasks and to take action to prevent such incidents happening again.

19 May 2020, London