

PRIVACY POLICY

UAB FINSTONA, company in Lithuania, commercial authorised to use the name ElevenUp, described in this privacy statement, complies with the General Data Protection Regulation (GDPR) an EU-wide regulation. GDPR provides a framework for organizations to ensure protection of personal information transferred among participating European economies.

Last Revised: 31 March 2022

This Privacy Policy (“Policy”) applies to UAB FINSTONA to all information collected by UAB FINSTONA, ElevenUp as explained above, through its platform and other applications (the “Sites”) where this Privacy Policy is posted. It also applies to information that UAB FINSTONA collects through offline methods.

The purpose of this Privacy Policy is to inform you of the kinds of information we may collect, how such information may be used, with whom such information may be shared, your choices regarding the collection, use and sharing of such information, your ability to access and correct such information and the security procedures we use to protect this information.

1. What information does UAB FINSTONA collect?

Information You Provide Us Directly

At different occasions, you may provide information directly to UAB FINSTONA, first and last name, mailing address, telephone number, email address, credit card information, banking information, biometric data, and biographical information (including, but not limited to, date of birth, education, and marital status). For example, you may provide us with information when using the Sites or when becoming a member. If you do not provide us with the requested information, in some cases, we will not be able to provide you the service you have requested or not even accept you as a member or even frozen your account.

For UAB FINSTONA, we collect information about services you used and information voluntarily uploaded by Members on the Sites. We collect information about the use.

If you disclose to us any information of another individual, you are required to have secured the appropriate consent of that individual for disclosing such information to us.

Information About Your Device and Your Use of the Sites

We may gather certain information automatically, such as Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamps, your Site activity (including the Site content you view, mouse movements,

mouse clicks, taps, swipes, and information you view), and/or clickstream data for purposes such as analysing trends, administering the Sites, improving the function and content of the Sites, and enforcing our Terms. We use standard Internet technologies, such as cookies, web beacons, session replay/screen capture, and similar technologies to collect this information, as explained below in the section on cookies.

We may also collect precise information about your location, such as your mobile device's GPS coordinates, cell tower information and/or Wi-Fi signals. UAB FINSTONA may use this information to personalize your experience in connection with your use of the Sites, products and services. If you do not want UAB FINSTONA to collect and use your specific geolocation information, you can disable the location features on your device. Check your device manufacturer settings for how to do so.

Information from Third-Party Sources

We may receive additional information about you from public and commercially available sources and other third parties. Other Members may also share information about you with UAB FINSTONA. If you access third-party services, such as Facebook, Google, or Twitter through the Sites, to log in to the Sites or to share information about your experience on the Sites with others, we may collect information from these third-party services. We may combine all the information we collect and receive about you, both online and offline, and use or disclose it in the manner described in this Privacy Policy.

2. How does UAB FINSTONA use my Information?

We use the information we collect about you for a variety of purposes, including: providing you with the products, services and support your request; processing your transactions, your orders; communicating with you about your account or transactions, changes to our policies and other administrative matters, or your questions and comments; to better understand your interests in order to provide you with promotional information, relevant content, product recommendations, surveys, questionnaires, and other materials; improving our products, services and operations; conducting data analytics, such as market and consumer research, trend analysis, and financial analysis; administering rewards programs; and ensuring compliance with our Company policies and Rules and the law, or as we believe is necessary to protect, enforce or defend the legal rights, privacy, safety or property of ourselves and others. We also use this information to validate sales made by UAB FINSTONA, communicate with and validate members in our systems, and for UAB FINSTONA compliance purposes. UAB FINSTONA may contact you directly for these purposes using various contact methods.

UAB FINSTONA may also use this information to support the operation of the Memberships and Distributorships, and to maintain proper functioning of the UAB FINSTONA Sales & Marketing Plan.

We may retain your information for as long as needed to: provide you services; fulfil other legitimate business needs, such as maintaining the proper function of the Sales & Marketing Plan; fulfil our compliance and legal obligations; and resolve disputes and enforce our agreements.

3. With whom does UAB FINSTONA share my Information?

Affiliates and Partners

We may share your information with our affiliates (companies that control, are controlled by, or are under common control with, UAB FINSTONA) as well as select partners. Examples of how these entities may use your information include making predictions about your interests and providing you with special offers, promotions, advertisements, and other materials.

Members & Service Providers

We may share your information with members that perform functions on our behalf. Examples of such functions include fulfilling orders, email administrative functions, conducting data analytics and helping us make our services more relevant (including through AI-based analysis).

Legal & Compliance Disclosures

We may also disclose your information: as required by law, such as to comply with a legal proceeding, or similar legal process, including disclosure to authorized third-party auditors; or when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate or prevent fraud, or respond to a government request.

Business Transitions

We may share your information if UAB FINSTONA is involved in a merger, acquisition, or sale of or transfer of assets, or in the unlikely event of bankruptcy.

Other Parties in Aggregated Form

We may share your information with third parties in aggregated or de-identified form.

Other Parties with Your Consent

In addition to the sharing described in this Privacy Policy, we may also share information about you with third parties for any other purpose disclosed to you at the time we collect the information or pursuant to your consent or direction.

4. How will UAB FINSTONA communicate with me?

UAB FINSTONA may communicate with you via email, postal mail, telephone, text message, or other means to provide requested products and services and/or regarding issues relating to your Membership. To validate sales, UAB FINSTONA may communicate with you via email, postal mail, telephone, text message, or other means on a regular basis (if you are a member).

Additionally, you may receive periodic information on UAB FINSTONA business, products, services, special deals, through various communication means as described above.

5. Is my Personal Information Secure?

We take steps to ensure that the personal information we collect about you remains accurate, timely and secure. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure and while we strive to protect your personal information, we cannot guarantee or warrant its complete security.

6. How can I Access or Correct my Information?

In some instances, you may visit one or more of our Sites to verify and update certain information. If you are not able to update your information on our Sites, please contact us. We will use commercially reasonable efforts to accommodate requests to update your information.

Submit your request here : info@elevenup.net

7. International Transfers.

Please be aware that information you provide to us or that we obtain as a result of your use of the Sites may be collected in your country and subsequently transferred to another country in accordance with applicable law. Using the Sites demonstrates your consent to the processing of information as described in this Policy.

8. Cookies and Tracking.

UAB FINSTONA as well as certain third parties that provide content and other functionality on our Sites, use cookies, web beacons, session replay/screen capture, and other similar technologies for various purposes, including to analyse trends, administer the website, track

users' movements around the Sites and to gather demographic information about our user base as a whole.

Cookies are small pieces of information that are stored on computer hard drives. A cookie enables the entity that put the cookie on your device to recognize it across different websites, services, devices, and browsing sessions. For example, we may use cookies to recognize you when you return to the Sites in order to provide you with a better user experience. We may allow third parties to use cookies on the Sites, but we do not control the use or contents of third-party cookies. Web browsers often allow you to configure the browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. If you elect to reject cookies, please note that you may not be able to take full advantage of the features and functions of the Sites. To learn more about cookies and how to manage them, please visit <http://www.allaboutcookies.org/>.

Web beacons and similar technologies are small bits of code, which are embedded in web pages, advertisements, and emails, that communicate with third parties. We use web beacons, for example, to count the number of users who have visited a particular webpage, to deliver or communicate with cookies, and to understand usage patterns. We also may include web beacons in emails to understand whether messages have been opened, acted on, or forwarded.

There are other local storage and internet technologies, such as Local Shared Objects (also referred to as "Flash cookies"), HTML5 local storage and embed scripts, which can operate similarly to the cookies discussed above. Please note that these technologies are distinct from cookies, and you may not be able to control them using standard browser tools and settings. For information about managing Flash cookies, please click www.adobe.com/privacy.html. To learn more about Adobe analytics and to opt out, click www.adobe.com/privacy.html.

We may use Bluetooth beacon technology to improve the UAB FINSTONA experience. Mobile devices that have enabled Bluetooth can receive a signal when in range of a beacon. The signals will not be received unless the user has turned on Bluetooth, installed an UAB FINSTONA mobile application and enabled push notifications. The beacon functionality may allow for notifications, customer check-ins, and payments. You can disable the beacon functionality in the app's settings.

9. Do Not Track.

Web browsers may allow you to send "Do Not Track" requests. We do not currently take actions to respond to Do Not Track signals because there is no current industry standard concerning what, if anything, websites should do when they receive such signals. We continue to review new technologies and may adopt a standard if one is created.

10. Online Advertising.

We may display advertising on our website and partner with third parties to manage advertising on other websites for our products and services. We may also partner with third parties, including business partners, advertising networks, and other advertising service providers, who gather information about you on our Sites and other sites to provide you with advertisements on the Sites and elsewhere online based on your browsing history and tailored to your interests, preferences, and characteristics. Cookies or other similar technologies may be used to provide you with advertising based upon your browsing activities and interests, and in some cases, the information in these cookies and in other technologies may be linked to your email address, which we may share with our service providers. We are not responsible for the privacy practices of these third parties, and the information practices of these third parties are not covered by this Policy.

Some third parties collect information about users of our Sites to provide interest-based advertising on our Sites and elsewhere, including across browsers and devices. These third parties may use the information they collect on our Sites to make predictions about your interests in order to provide you ads (from us and other companies) across the internet. Some of these third parties may participate in industry-developed programs designed to provide consumers with choices about whether to receive targeted advertising. Due to differences between using apps and websites on mobile devices, you may need to take additional steps to disable targeted ad technologies in mobile apps. Many mobile devices allow you to opt out of targeted advertising for mobile apps using the settings within the mobile app or your mobile device. For more information, please check your mobile settings. You also may uninstall our apps using the standard uninstall process available on your mobile device or app marketplace.

To opt out of interest-based advertising across browsers and devices from companies that participate in the Digital Advertising Alliance or Network Advertising Initiative opt-out programs, please visit the websites operated by the Network Advertising Initiative ([//www.networkadvertising.org/choices/](http://www.networkadvertising.org/choices/)) and the Digital Advertising Alliance ([//www.aboutads.info/choices/](http://www.aboutads.info/choices/)). You may also be able to opt out of interest-based advertising through the settings within the mobile app or your mobile device, but your opt-out choice may apply only to the browser or device you are using when you opt out, so you should opt out on each of your browsers and devices if you want to disable all cross-device linking for interest-based advertising. Further information in local languages may be available at www.youronlinechoices.com/. If you are located in the European Union, more information is available at <http://www.youronlinechoices.eu/>. Please note that even if you use an industry-based opt-out for interest-based advertising, you will continue to receive generic advertisements and your experience on our Sites may be degraded.

11. Third-Party Links.

The Sites may contain links to websites operated and maintained by third parties over which we have no control. Any information you provide to third-party websites will be governed under the terms of each websites' privacy policy and we encourage you to investigate such policies before disclosing any information to the operators of third-party websites. We have

no responsibility or liability for the content, actions or policies of third-party websites. The inclusion of links to third-party websites on our Sites in no way constitutes an endorsement of such websites' content, actions or policies.

12. Third-Party Functionality.

Some of the functionality on the Sites may be provided by third parties that are not affiliated with UAB FINSTONA. These entities may collect or receive certain information about your use of the Sites, including through the use of cookies, Web beacons, and similar technologies. UAB FINSTONA is not responsible for the privacy practices of these entities.

If you access third-party services, such as Facebook, Google, or Twitter, through the Sites, to log in to the Sites or to share information about your experience on the Sites with others, these third-party services may be able to collect information about you, including information about your activity on the Site, and they may notify your connections on the third-party services about your use of the Site, in accordance with their own privacy policies.

13. Modifications to this Policy.

This Privacy Policy was last updated on the date listed at the beginning of this Policy. UAB FINSTONA reserves the right to change this Privacy Policy at any time. Any changes to this Policy will be effective immediately upon notice, which may be provided to you by posting the latest version on the Sites. Your subsequent use of the Sites will be deemed acceptance of such changes. Be sure to review this Privacy Policy periodically to ensure familiarity with its most current version. By using the Sites following the posting of changes to this Privacy Policy, you agree to all such changes.

14. What if I have questions?

FINSTONA takes privacy concerns seriously. If you have questions or comments, you may contact us at:

info@elevenup.net