

The following is the privacy policy for ZILIS distributors.

**The controller within the meaning
of data protection law is:**

Zilis LLC
415 US Hwy 377, STE 2020
Argyle, TX 76226
USA
Email: compliance@zilis.com

Our data protection officer is:

ZILIS Czech Republic s.r.o.
110 00 Prague – Nové Mesto
Czech Republic
Email: compliance@zilis.com

1. As the controller pursuant to provisions under data protection law, we agree to protect your personal data and to treat it confidentially. Collecting, saving, changing, transmitting, blocking, deleting, and using your personal data takes place based on applicable, statutory regulations, especially the General Data Protection Regulation (GDPR). We have adopted technical and organizational measures which ensure that we and our external suppliers follow the regulations on data protection.

2. We save your personal data as long as it is necessary to achieve the processing purpose, or as long as data must be saved for the statutory retention period. We save data that we process based on issued consent until you revoke consent. We save data that we process to execute a contract with you for as long as the contractual relationship exists and, beyond that, if statutory retention periods require us to do so. We store data that we process based on our legitimate interests if your interest in deleting the data does not predominate.

3. We need the following personal data from you to conclude a contract with you as a distributor:

Title, last name, first name, address, company (if applicable), birth date, email address, telephone number, VAT ID number, bank and funds transfer information. This information is required to establish and execute the contract with you as a distributor. The legal basis for processing this data is Art. 6 para. 1 sentence 1 letter b of the GDPR.

Moreover, for purposes of money laundering

prevention, ZILIS is legally required within the scope of the “know-your-customer” procedure to identify future distributors prior to entering into a Distributor Agreement within the scope of a legitimation review (so-called “KYC audit”). Within the scope of the audit, the following personal data are processed: title, first name, last name, address, nationality, place of birth, birth date. The basis for processing this data is Art. 6 para. 1 sentence 1 letter c of the GDPR.

4. As a distributor, you have access to the back office. In the back office, you will have an overview of orders that you arranged. For this, the following information about the individuals for whom you have arranged an order are displayed to you:

status (customer/distributor), last name, first name, email, net product value of the orders from the previous month, number of team members, time of last online activity. This information is required to bill and track commission claims. The legal basis for processing this data is Art. 6 para. 1 sentence 1 letter b of the GDPR.

Moreover, you may view a team overview in the back office. You receive information there on the independent distributors you have acquired in your downline. The following information is displayed for this:

status (customer/distributor), last name, first name, net product value of the orders from the previous month, number of team members, time of last online activity. This information is required to bill and track commission claims. The legal basis for processing this data is Art. 6 para. 1 sentence 1 letter b of the GDPR.

5. We need the following data to process commission payments:

title, last name, first name, address, bank data. This information is required to bill and track commission claims. The legal basis for processing this data is Art. 6 para. 1 sentence 1 letter b of the GDPR.

6. We share your personal data with third parties only to the extent this is required to execute the contract or to protect our legitimate interest. We also make use of external suppliers (processor) for execution of the contract. Separate processor contracts have been made

with suppliers in order to guarantee the protection of your personal data. Additionally, third parties who are not ZILIS processors are required, even as their own controller within the meaning of data protection law, to process the distributor's data in accordance with the GDPR and other applicable provisions under data protection law.

a) To calculate the difference commission of the independent distributor from your upline, the aforementioned information on your orders as well as your team overview is also displayed to the distributors in your downline. Your upline distributors receive the following information:

status (customer/distributor), last name, first name, email, net product value of the orders from the previous month, number of team members, time of last online activity. This information is required to bill, and track difference commission claims from your upline. The legal basis for processing this data is Art. 6 para. 1 sentence 1 letter b of the GDPR.

b) To complete deliveries, the distributor's first and last name, address, email address, and telephone are forwarded to shipment companies.

c) To process payments, the distributor's payment data, namely first and last name, address, email address, telephone number, birth date, IBAN, BIC is forwarded to the financial institution or payment intermediary.

d) To complete our bookkeeping, we give the distributor's personal data to our external bookkeeping service provider, namely the distributor's first and last name, address, email address, and telephone number in connection with customer orders and commission calculations.

e) Data sent to the service provider set forth in 8 b) - d) is transmitted to execute the contractual relationship with you as a distributor as well as to protect our legitimate interests. The legal basis for processing this data is Art. 6 para. 1 sentence 1 letter b and f of the GDPR.

7. Because of requirements under commercial and tax law, ZILIS is required to save the distributor's address and payment information for the period of 10 years. However, after

two years, ZILIS restricts processing, i.e., the distributor's data are used only to comply with legal obligations. The legal basis for saving this information is Art. 6 para. 1 sentence 1 letter c GDPR. Moreover, the distributor's data are deleted upon complete processing of the contract, which also includes complete payment of the agreed fees.

8. As the data subject, the distributor has the right to:

- information about how their data is processed
- correction or deletion of their data
- restriction of data processing
- objection against data processing
- request data transferability
- revocation of the consent they might have issued with effect for the future
- file a complaint with the data protection supervisory authorities;

A list of all supervisory authorities is found here:
https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html

To assert their rights, the distributor may contact ZILIS (see address at the start of the Privacy Policy) or ZILIS's data protection officer.