

Data protection

(1) **Controller:** Company: AVALO Europe Ltd., address: 243-249 Fenchurch Street, First Floor, EC3M 6BL London, phone: 00447706714965, e-mail: data-protection@avalo-energy.com, Internet: avalo-energy.com

(2) **Contact for data protection issues:** e-mail: data-protection@avalo-energy.com

(3) In the case of purely informative use of our website, i.e. if you do not register or otherwise provide us with information, we only collect the personal data transmitted by your browser to our server. When you want to visit our website, we collect the following data that we require technically to display our website and to ensure stability and security.

IP address

Date and time of the request

Time zone difference to Greenwich Mean Time (GMT)

Content of the request (specific page)

Access status/HTTP status code

Amount of data transmitted in each instance

Website, from where the request is sent

Browser

Operating system and its interface

Language and version of the browser software

However, our web server stores this data separately from other data, and it is not possible for us to attribute this data to a specific person. This data is deleted immediately after an anonymous evaluation for statistical purposes. The evaluation of the data is in the legitimate interest of Avalo Europe to optimize our offer. Legal basis is Art. 6 (1), sentence 1, point (f) GDPR.

(4) In addition to the aforementioned data, cookies are stored on your computer when using our website. Cookies are small text files that are stored on your hard disk and assigned to the browser you are using. They provide certain information to the entity setting such cookie. Cookies cannot execute programs or transmit viruses to your computer. Their purpose is to make the website overall more user-friendly and effective.

The Avalo Europe website uses the following types of cookies, the scope and function of which are explained below:

- a) Transient cookies are deleted automatically when you close the browser. This includes in particular session cookies. They store a so-called session ID, which can be used to assign various requests by your browser to the joint session. In this way, your computer can be recognized when you return to the website. The session cookies are deleted when you log out or close the browser.
- b) Persistent cookies are deleted automatically after a specified period, which may vary depending on the cookie. You can delete the cookies in the security settings of your browser at any time.
- c) Third-party cookies are not stored by Avalo Europe, but are placed by third-party providers on a user's computer and can be read out on the team partner's computer when the website is visited again. Unlike cookies, which are used by Avalo Europe itself, these are service providers who usually collect advertising-relevant information about users.

You may configure your browser settings according to your wishes and, e.g. refuse to accept third-party cookies or any cookies at all. If you do not want Flash cookies processed, you will need to install an appropriate add-on, e.g. 'Better Privacy' for Mozilla Firefox (<https://addons.mozilla.org/de/firefox/addon/betterprivacy/>) or 'Adobe Flash Killer Cookie' for Google Chrome. You can prevent the use of HTML5 storage objects by using your browser in private mode. We also recommend that you regularly delete your cookies and browser history manually.

Please note that by deactivating cookies you may not be able to use all the functions of this website.

The use of cookies is in the legitimate interest of Avalo Europe to optimize our offer. Legal basis is Art. 6 (1), sentence 1, point (f) GDPR.

(5) If you register with us as a team partner, we process additional personal data from you:

- a) To conclude the contract we need the following personal data from you:

Title, name, address, e-mail address, telephone number, fax number, bank transfer data, date of birth, VAT ID, user name, optionally social networks.

This information is necessary to establish and execute a contract as a team partner. The legal basis for processing such data is Article 6 (1), sentence 1, point (b) GDPR.

- b) As a team partner, you furthermore have access to the back office. In this back office you will receive an overview of the orders initiated by you. The following information will be displayed:

Order number, order date, team partner ID, name, products, order status and payment status, default.

This information is required to calculate and track your commission entitlements. The legal basis for processing such data is Article 6 (1), sentence 1, point (b) GDPR.

You can also see a team overview in the back office. There you will receive information about the team partners you have recruited in your downline. The following information will be displayed:

First name, last name, place and country of residence, user name, date of registration, number of team partners, number of referred customers, date of last login, date of last participation in a webinar, account status or termination status, career level of the team partner.

This information is required to calculate and track your commission entitlements. The legal basis for processing such data is Article 6 (1), sentence 1, point (b) GDPR.

You will also receive information about orders placed by your other team partners and/or customers. The following information will be displayed:

Order number, order date, team partner ID, name of customer or TP, products, order status and payment status, subscription, default.

This information is required to calculate and track your commission entitlements. The legal basis for processing such data is Article 6 (1), sentence 1, point (b) GDPR.

(6) Under commercial and tax law we are required to store your address, payment and order data for a period of ten years. However, we will restrict processing after two years, i.e. your data will be used only to comply with statutory obligations.

Legal basis for such storage is Art. 6 (1), sentence 1, point (c) GDPR. In addition, the team partner's data will be deleted upon complete execution of the contract, including full payment of the agreed fees.

(7) We will disclose your personal data to third parties only insofar as this is necessary to execute the contract or to safeguard our legitimate interests.

The team partners will receive the following information from your upline:

First name, last name, place and country of residence, user name, date of registration, number of team partners, number of referred customers, date of last login, date of last participation in a webinar, account status or termination status, career level, order

number, order date, ID of the team partner, name of customer or TP, products, order status and payment status, default.

This information is required to calculate and track your difference commission in your upline. The legal basis for processing such data is Article 6 (1), sentence 1, point (b) GDPR.

We also use external service providers (processors) to execute the contract. Separate data processing has been concluded with the service providers in order to guarantee the protection of your personal data.

In order to process money transfers, it is necessary to disclose your personal data, such as name/company, IBAN, BIC, to our banks.

The data transfer to such service providers is carried out to execute the contractual relationship with you and also to safeguard our legitimate interests. The legal basis for such data processing is Article 6 (1), sentence 1, point (b) and (f) GDPR.

(8) With your consent, you can subscribe to our newsletter, where we will inform you about our current interesting offers. The advertised goods and services are specified in the declaration of consent.

We use the so-called double opt-in procedure for subscriptions to our newsletter. This means that after your registration, we will send an e-mail to your specified e-mail address, asking you to confirm that you wish to receive the newsletter. If you do not confirm your registration within 24 hours, your information will be blocked and automatically deleted after one month. In addition, we will store the IP addresses you use and the registration and confirmation dates. The purpose of the procedure is to prove your registration and, if necessary, to clarify any possible misuse of your personal data.

Your e-mail address is the only mandatory information for sending the newsletter. The provision of further, separately marked data is voluntary and will be used to enable us to address you in person. After you have confirmed, we will save your e-mail address for the purpose of sending you the newsletter.

You may withdraw your consent to receiving the newsletter at any time and unsubscribe from the newsletter. You may declare your withdrawal by clicking on the link provided in every newsletter e-mail, using the form on our website, by e-mail to office@avalo-energy.com, or by sending a message to the contact details set forth in section 1.

We use external service providers (processors) to send the newsletter. Separate data processing has been concluded with the service provider in order to guarantee the protection of your personal data.

Our service provider for sending the newsletter is: Mailchimp

Please note that we will evaluate your user behavior when sending the newsletter. For this evaluation, our e-mails contain so-called web beacons or tracking pixels, representing one-pixel image files stored on our website. For evaluation purposes, we will link the data referred to in paragraph 2 and the web beacons with your e-mail address and an individual ID. As the data will be collected exclusively under a pseudonym, the IDs are not linked to your other personal data, any direct personal reference will be excluded. You may object to this tracking at any time by clicking on the separate link provided in each e-mail or by informing us using any other contact method. The information will be stored as long as you have subscribed to the newsletter. Once you have unsubscribed, we will store the data purely for statistical purposes and anonymously.

This data processing will be based on your consent. Legal basis is Art. 6 (1), sentence 1, point (a) GDPR.

(9) If an enquiry is made to our contact e-mail address provided on the website or via the provided contact form, only the personal data provided by you will be collected and processed within the scope of your consent obtained there. The data transmitted by you within the scope of an enquiry will be collected, processed and used exclusively for processing your request.

We use external service providers (processors) to execute our website. Separate data processing has been concluded with the service provider in order to guarantee the protection of your personal data.

Our service provider for the website is: Vodien Internet Solutions Pte Ltd

We will transmit your following personal data in encrypted form to this service provider, Vodien Internet Solutions Pte Ltd: complete address, bank details, telephone number, e-mail address, date of birth, profile photo, VAT ID, company name

You may withdraw your consent to the processing of your personal data within the scope of the contact enquiry at any time with regard to the future. You may declare your withdrawal by e-mail to data-protection@avalo-energy.com, or by sending a message to the contact details set forth in section 1.

This data processing will be based on your consent. Legal basis is Art. 6 (1), sentence 1, point (a) GDPR.

(10) Avalo Europe uses Google Analytics, a web analysis service provided by Google Inc. ('Google'). Google Analytics uses so-called 'cookies', text files that are stored on your computer and allow for analyzing your use of the website. The data generated by the cookie about your use of this Website usually is transmitted to a Google server in the USA and stored there. However, if IP anonymization is enabled on this website, your IP address is first shortened by Google within European Union Member States and in other states that are party to the Agreement on the European Economic Area. The full IP address is sent to a Google server in the USA and shortened there in exceptional cases only. On behalf of the operator of this website, Google will use this

information to evaluate your use of the Website, to compile reports on website activities, and to provide the website operator with further services related to website and Internet use.

The IP address transmitted in the context of Google Analytics by your browser is not merged with other data provided by Google.

You may refuse the placement of cookies by selecting the appropriate settings on your browser; however, please note that if you do this, you may not be able to use the full functionality of this website. You may furthermore prevent the collection of the data generated by the cookies relating to your use of the website (incl. your IP address) by Google as well as the processing of such data by Google, by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.

This website uses Google Analytics with the extension "_anonymizeIp()". IP addresses thus are processed in a shortened form, excluding the possibility of any personal references. If the data collected about you can be related to a person, this will be excluded immediately and the personal data will be deleted immediately.

We use Google Analytics to be able to analyze the use of our website and to improve it regularly. The generated statistics will enable us to enhance our services and make them more interesting for you as a user. For the exceptional cases where personal data is transferred to the USA, Google has submitted to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

Information about the third-party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, fax: +353 (1) 436 1001. Terms of use: <http://www.google.com/analytics/terms/de.html>, privacy summary: <http://www.google.com/intl/de/analytics/learn/privacy.html>, and privacy statement: <http://www.google.de/intl/de/policies/privacy>.

This website also uses Google Analytics for a cross-device analysis of visitor flows, which is carried out via a user ID. You may deactivate the cross-device analysis of your use in your customer account under 'My data', 'Personal data'.

The use of Google Analytics is in the legitimate interest of Avalo Europe to optimize our offer. Legal basis is Art. 6 (1), sentence 1, point (f) GDPR.

(11) On its website, Avalo Europe uses 'Facebook Pixel', a service of Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA (hereinafter referred to as 'Facebook'). Facebook Pixel enables Facebook to display our ads on Facebook, so-called 'Facebook ads', only to Facebook users who have visited our website, in particular those who have shown an interest in our online offerings or in certain topics or products. Facebook Pixel makes it possible to check whether a user has been redirected to our website after clicking on our Facebook ads. Among other things, Facebook Pixel uses cookies, small text files that are stored locally in the cache of your web browser on your terminal. If you are logged on to Facebook with your user

account, the visit to our online offer is noted in your user account. The data collected about you remains anonymous to us and does not provide us with any information about the identity of users. However, Facebook may link such data to your local user account. We do not have any influence on extent and further use of data collected by Facebook using Facebook Pixel. To our knowledge, Facebook receives information that you have visited the relevant part of our website or clicked on one of our ads. If you have a Facebook user account and are registered, Facebook can attribute the visit to your user account. Even if you are not registered with Facebook or have not logged in, Facebook may still collect and store your IP address and other identifying information.

We use Facebook Pixel for marketing and optimization purposes, in particular to place relevant and interesting ads on Facebook and thus to improve our offer, make it more interesting for you as a user and avoid annoying ads.

You may object to the collection by Facebook Pixel as described above and to the use of your data to display Facebook ads.

On the following Facebook website, you may adjust settings about the types of ads displayed to you on Facebook: <https://www.facebook.com/settings?tab=ads>.

Please note that this setting will be deleted if you delete your cookies. You may also deactivate cookies, which are used for range measurement and advertising purposes, via the following websites:

<http://optout.networkadvertising.org/>

<http://www.aboutads.info/choices>

<http://www.youronlinechoices.com/uk/your-ad-choices/>

Please note that this setting will also be deleted if you delete your cookies.

Facebook has also signed and certified the Privacy Shield Agreement between the European Union and the United States. Facebook thus has committed to comply with the standards and regulations of European data protection law. For further information go to:

<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>

For more third-party provider information on privacy visit the Facebook website below:

<https://www.facebook.com/about/privacy>

Information about Facebook Pixel is available on the following Facebook website: <https://www.facebook.com/business/help/651294705016616>

For more information about collection and use of this information by Facebook and about your relevant rights and choices in protecting your privacy, see Facebook's Data Policy: <https://www.facebook.com/about/privacy/>

Legal basis for the use of Facebook Pixel is Article 6 (1) point (f) GDPR.

(12) We use the European Commission's VAT information exchange system 'VIES' to check the validity of the provided VAT number when registering users. We will be only provided with a 'yes' or 'no' answer; name or address in connection with a valid VAT number will not be disclosed.

(13) You are entitled at any time and free of charge to request access to your data as well as a rectification, erasure or blocking or the transfer of the data to a body to be designated by you. You may also withdraw your consent to processing at any time with effect for the future. If you would like further information about the storage of your personal data or to exercise one of the aforementioned rights, please contact support by e-mail at data-protection@avallo-energy.com or write to the postal address of Avalo Europe.

You furthermore have the right to lodge a complaint about our processing at any time with the competent supervisory authority. Your competent supervisory authority is the one at your place of residence.

We hope that this information has assisted you with exercising your rights. If you would like further information on the data protection provisions, please contact any of the persons named in paragraph 1.

(14) This Privacy Statement can be viewed and accessed at any time on the Avalo Europe website.