



# Amare

## Privacy Policy – Europe

## 1. Our commitment to privacy

Our Privacy Policy (together with our Terms of Use) has been developed as an extension of our commitment to combine quality products and services with integrity in dealing with users. The Policy is designed to assist you in understanding how we collect, use, and protect the personal information provided to us in accordance with the UK General Data Protection Regulation (UK GDPR) and any other applicable national implementing laws, regulations, and secondary legislation, as amended or updated from time to time, in the UK (Data Protection Legislation). This Privacy Policy is applicable only to our websites and not to any third-party websites that may link to or from this website. Such linked websites may have data collection, storage, and use practices and policies that differ materially from our data collection, storage, and use practices and policies as set forth in this Privacy Policy.

## 2. Who are we

Amare Global Europe AB and its Affiliates (“Amare Global”, “Amare”, “we”, “us”, “our”, or the “Company”) is a supplier of food and nutritional supplements. For the purposes of UK data protection law (UK GDPR and the Data Protection Act 2018), we act as the data controller for the personal data we collect and process in connection with our UK websites and services. We are required to provide you with the information set out in this Privacy Policy. You can contact us at [privacy@amare.com](mailto:privacy@amare.com)

## 3. How we use information

We use your personal data for the purposes and on the lawful bases set out below, in line with the UK GDPR. Different activities may rely on different lawful bases; we identify and document the basis for each purpose. [ICO](#)

**Contract & legal obligations.** We process your data as necessary to **perform our contract** with you (e.g., processing and completing orders, customer service, updates on order status) and to **comply with legal obligations** (e.g., tax and accounting).

**Legitimate interests.** We also process data for our **legitimate interests**—provided they are not overridden by your rights and freedoms—such as business operations and development, service management, statistical/analytics and research activities (including transaction analysis) and to **create marketing profiles** to tailor content and offers. Where we rely on legitimate interests, you have the **right to object** at any time; if the objection relates to **direct marketing**, your right is **absolute** and we will stop that processing.

**Consent (where required).** In some cases we will ask for your **explicit consent** (e.g., certain optional features or communications). You can **withdraw consent at any time**, and it must be as easy to withdraw as to give it. We will then stop that processing unless another lawful basis applies.

**Examples of how we use your information.** We may use your personal information to optimise the presentation of content on our website, send updates about our company, events and product specials, gather feedback on our services, fulfil obligations from agreements with you (including processing and updating you on order status), enable your participation in interactive features you choose to use, and inform you about changes to our products or services.

### Automated Decision-Making & Profiling

We may use **profiling** to tailor content and offers to you. We do **not** make decisions **based solely on automated processing**, including profiling, that produce **legal or similarly significant effects** about you. If we ever plan to carry out such processing, we will provide meaningful information about the logic involved and your rights **before** it occurs (including your rights to obtain **human review**, to **express your view** and to **contest** the decision). You may **object** to profiling for **direct marketing** at any time.

## 4. The information we collect

When you visit our site, we collect two types of information: personal information you actively choose to disclose (“Active Information”) and information not visible to you that arises out of your browsing of our site (“Passive Information”). Please note that Passive Information is collected on an aggregate and anonymous basis. The legal basis for processing is either, in case you give us your consent, Art. 6 para. 1 a) GDPR, or in all other cases, Art. 6 para. 1 f) UK GDPR.

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for unrelated purpose, we will notify you and we will explain the legal basis of which we are allowed to do so.

### 4.1. Personally Identifiable Information

Personally Identifiable Information is information that identifies and is reasonably linked to you. Such information includes, without limitation: (1) “Contact Data” (such as your name, mailing address and e-mail address); (2) “Demographic Data” (such as your age, gender and date of birth); and (3) “Financial Data” (such as your credit/debit card number and expiration date). We will also keep records of your transaction history. We do not collect Personally Identifiable Information from you through this Website without first asking you to provide it. The Website does not gather Personally Identifiable Information from you without your knowledge. We use your financial information, such as a bank account or credit card number **ONLY** for billing purposes (on the basis of Art. 6 para. 1 b) UK GDPR).

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered with you, or we may not comply with our legal obligations.

- a. Registration: When you register to become an authorized reseller of our products or services (an “Independent Brand Partner”) or when you register to become a Preferred Customer or other registered customer, we will collect Personally Identifiable Information (such as name, address, email address, telephone number, credit/debit card information, and your Social Security, TIN or VAT number, as applicable). This Personally Identifiable Information is securely stored and may be accessed on our website. You are assigned an identification number and select your own password – both are needed to enter the Site and to access your Contact Information. Please safeguard your password in a secure location as we are not responsible for breaches into the system when access is willingly provided.
- b. Ordering: When you place an order for products or services, we collect Personally Identifiable Information (such as name, contact and billing information, credit card, and other transactional information). We use this information to deliver your order, process payment, and to communicate the status of your order.
- c. Credit and Debit Card Storage: We use **third-party payment processors** to handle card transactions. Card details you enter at registration or checkout are transmitted **directly to the processor over an encrypted connection**. The processor acts as our **data processor** and must implement **appropriate technical and organisational measures** under the UK GDPR. We **do not store full primary account numbers (PAN) or CVV/CVC** codes on our systems. If you choose to **save a card** for future purchases or for registration/renewal fees, our processor stores a **tokenised** reference to your card. We retain **only the last four digits and expiry date** for identification, customer support and fraud-prevention purposes. You can **remove a saved card at any time** via your account settings or by contacting us. Our processors are required to follow **industry-standard controls** (e.g., tokenisation; no storage of sensitive authentication data such as CVV after authorisation) and to process your payment data **solely** to provide payment services on our behalf. **Legal bases:** contract performance (to take payment and manage orders), our legitimate interests (fraud prevention and account administration) and, where applicable, legal obligations relating to financial record-keeping.
- d. Surveys and Promotions: Occasionally, you may voluntarily provide Personally Identifiable Information to complete surveys and questionnaires or to participate in user polls. We use this information to improve our products and services and to ensure that we’re providing accurate disclosures. We may also use your Personally Identifiable Information to provide you newsletters and other marketing information that coincide with your preferences. You may customize your marketing preferences, or let us know if you do not wish to receive any promotional materials, by contacting us at [compliance.eur@amare.com](mailto:compliance.eur@amare.com), or by adjusting your Subscriptions & Email options on the Site.

#### 4.2. Transferring Your Personal Information Outside the EU

- We may store and process your personal information in any country where we operate, including the USA, which lies outside the UK. Although some countries (including the USA) do not have the same data-protection regime as the UK, we commit to handling your personal data in accordance with UK data-protection laws as a data controller.
- It is common for some of our external third-party processors to be located outside the UK, which may necessitate transfers of your personal data beyond UK borders.
- We ensure that any transfer of your personal data outside the UK is conducted lawfully, securely and in line with the UK GDPR by establishing appropriate agreements with recipients and implementing one or more of the following safeguards:
  - UK adequacy regulations: we transfer personal data to countries that the UK Government recognises as providing an adequate level of protection. (<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-transfers-a-guide>)
  - Standardised contractual safeguards: for certain service providers, we use the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, and we carry out a Transfer Risk Assessment (TRA) where required. (<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-data-transfer-agreement-and-guidance>)
  - Transfers to the United States: where the recipient is self-certified under the UK Extension to the EU-U.S. Data Privacy Framework (the “UK-US Data Bridge”), we may transfer personal data to that organisation without additional safeguards under Article 45 UK GDPR. (<https://www.gov.uk/government/publications/uk-us-data-bridge-supporting-documents/uk-us-data-bridge-factsheet-for-uk-organisations>)
  - Where none of the above applies, we will use another safeguard permitted by the UK GDPR or, if appropriate, rely on a relevant Article 49 exception for specific situations. (<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-transfers-a-guide>)
  - We do not rely on the EU-U.S. Privacy Shield.

- For more details on the mechanisms we use for transferring your personal data out of the UK, please contact our Compliance Team at [privacy@amare.com](mailto:privacy@amare.com)
- You can also consult the following official resources:
  - UK-US Data Bridge – Explainer / Factsheet (GOV.UK) (<https://www.gov.uk/government/publications/uk-us-data-bridge-supporting-documents/uk-us-data-bridge-explainer>)
  - ICO – International Transfers: A Guide and ICO – IDTA & UK Addendum Guidance. (<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/international-transfers-a-guide>)
  - Data Privacy Framework – UK Extension programme (U.S. Department of Commerce). (<https://www.dataprivacyframework.gov/Program-Overview>)

#### 4.3. Active Information You Choose to Provide

In order to gain use of the site (become a “user”), we require you to disclose the following information: Name, Address and Phone Number

We use secure socket layer (SSL) encryption to protect the transmission of the information you submit to us when you use our secure online forms. The information you provide to us is stored securely.

#### 4.4. Passive Information

We collect various types of **technical and usage information** when you browse our site. This may include your **Internet Protocol (IP) address, device operating system and browser type, cookie IDs and other online identifiers, the address of a referring website** or other paths you take to reach our website, **pages viewed, time spent**, and similar interaction data.

These data **may be personal data** under the UK GDPR even if we do not directly know your name (for example, **IP addresses and cookie identifiers** can be personal data). We use passive information to operate and secure our website (e.g., diagnose server issues, prevent fraud and abuse, maintain security) and to understand and improve how our site is used. Our legal basis for these purposes is our **legitimate interests** (Article 6(1)(f) UK GDPR).

Where passive information involves **storing or accessing information on your device** (e.g., analytics or advertising cookies), we will only do so **with your consent** except for **strictly necessary** cookies required to provide the service you request. For details and controls, see **Section 6: Cookies & Similar Technologies** (you can manage or withdraw consent at any time via the Cookie Preferences centre).

We may **aggregate or anonymise** passive information for statistics and reporting. **Once data are truly anonymised and can no longer reasonably identify you, the UK GDPR no longer applies** to those data.

- ICO – *Guide to the UK GDPR: Personal data (includes online identifiers such as IP addresses and cookie identifiers):* <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/personal-data/>
- UK GDPR, *Recital 30 (online identifiers such as IP addresses, cookie identifiers, etc.):* <https://www.legislation.gov.uk/eur/2016/679/recital/30>
- UK GDPR, *Recital 26 (truly anonymous information is not personal data):* <https://www.legislation.gov.uk/eur/2016/679/recital/26>
- ICO – *Guide to PECR: Cookies and similar technologies (consent requirements and exemptions):* <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>

#### 4.5. Aggregate Information

This refers to information that does not, by itself, identify you as a specific individual. Such information would include the Uniform Resource Locator (“URL”) of the website that referred you to our Site, your Internet Protocol (“IP”) address (a number automatically assigned to your computer whenever you surf the web), your operating system and browser type, and any search terms that you enter on our Site. Our web server aggregates this information in order to monitor the level of activity on our Site, evaluate its effectiveness, and improve the content or our Site in order to make your visit an easy and enjoyable experience.

We may collect, compile, store, publish, promote, report, or otherwise disclose or use any Aggregate Information, provided that such information does not personally identify you. We do not correlate any Personally Identifiable

Information with the Aggregate Information that we collect on our Site. If we do correlate any Aggregate Information to you, it will be protected like any other Personally Identifiable Information under this Privacy Statement.

## 5. Information obtained from third party sources

We may receive information about you such as contact information and demographics information from other sources. In addition, we may combine information you give us with information from these sources. The types of information and sources of such information include without limitation the following categories:

**Vendors.** We may receive contact information and demographic information that you provide to or through our vendors, such as through our email and text message campaigns.

**Your Amare Global Independent Brand Partner (if applicable).** Information such as account or demographic information that is submitted by your Amare Global Independent Brand Partner on your behalf.

**Payment Service Providers.** Payment information such as updated credit card number and expiration dates from your bank or credit card company which we use to keep our records current and service you better.

**Delivery Service Providers.** Delivery details such as updated delivery, contact information, and address information from our carriers or other third parties which we use to keep our records current, process orders, deliver your next purchase, and service you better.

**Social Media Services.** Information that you publicly post on our and your social media pages (e.g., our Facebook®, Instagram®, and Twitter® pages), such as your contact and demographic information, such as likes, interests, preferences, comments, suggestions, and opinions, general feedback, and content.

**Other Third-Party Sources (Including Data Aggregators and Public Databases).** Transactional data from third party purchases; contact information, demographics information, including profile data; information about products or services purchased from other companies.

## 6. Cookies & Similar Technologies (UK PECR + UK GDPR)

Cookies are small text files placed on your device by your browser that help websites recognise your device, simplify subsequent interactions and make online experiences easier. We use cookies and similar technologies to operate our site, help you move between pages and complete transactions, measure performance and fix errors, and—**where you allow**—to personalise content and marketing. Technical/usage data we collect in this context can include the **date and time of visits, pages viewed, time spent, referring/exit pages, device and browser details** and your **IP address**. Some **online identifiers** (e.g. cookie IDs and IP addresses) **may constitute personal data** under the UK GDPR.

**Our use and the legal rules (PECR Reg. 6):** Except for limited exemptions, UK law requires that we **obtain your consent before** storing or accessing information on your device (e.g. setting non-essential cookies). The exemptions cover (i) the ‘communication’ exemption and (ii) **strictly necessary** cookies used to provide a service you request (e.g. keeping you logged in, basket, load-balancing, security). (<https://www.legislation.gov.uk/ukssi/2003/2426/regulation/6>)

### How we use cookies on this site

**Strictly necessary cookies** are used only to deliver the service you request. These **do not require consent**.

All other cookies (e.g. analytics, functional, advertising) are **disabled by default** and will run only if you **actively consent** via our cookie banner or the **Cookie Preferences** centre. You can **withdraw consent at any time** using the “Cookie Preferences” link in the footer; mechanisms for information and choices are kept easily accessible. We **do not rely on implied consent** (e.g. “by using this website you accept cookies”). (<https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guide-to-pecr/cookies-and-similar-technologies>)

**Session vs. persistent cookies.** We use both **session** cookies (which expire when you close your browser) and **persistent** cookies (which stay for a defined period). Either type can be used in the categories above depending on their purpose; where they relate to non-essential purposes, we seek your consent first. (<https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guide-to-pecr/cookies-and-similar-technologies>)

### Your choices.

- Manage your settings any time via **Cookie Preferences** (consent/withdrawal by category).
- You can also block or delete cookies in your **browser settings**; however, disabling cookies may affect site functionality (e.g. login/basket). Browser controls are **in addition to**, not a substitute for, our consent mechanism.

[\(https://ico.org.uk/media2/for-organisations/guide-to-pegr/guidance-on-the-use-of-cookies-and-similar-technologies-1-0.pdf\)](https://ico.org.uk/media2/for-organisations/guide-to-pegr/guidance-on-the-use-of-cookies-and-similar-technologies-1-0.pdf)

**More information.** Our separate **Cookie Policy** lists each cookie/category, purpose, provider and retention period, and explains any third-party cookies we use.

## 7. How we use the information collected

Broadly speaking, persons we employ directly, or as contractors or agents at our direction, use Active Information for purposes of administering our core business functions, such as the fulfillment of orders or services, the furnishing of customer care and support, and supplying the availability of other products or services we think might be of interest to our users.

We use Passive Information to gather information about our users and to enhance our site to make it easier, faster and friendlier for users. Additionally, cookies help us better understand the usage pattern of the people that visit our site, which helps us improve our services. Passive Information may result in your viewing of particular advertising based on your user habits.

We reserve the right to use Active and Passive Information in order to prevent, detect and investigate fraud, security breaches, or any other potentially prohibited or illegal activity.

We may use any Active Information or Passive Information provided to contact you about various changes to our site, new services, features or products we offer. If at any time you do not wish to receive such information, you may “opt-out” of doing so by adjusting your email settings in the back office of the website.

### 7.1. Your Information Relating to Hyperlinks

You might be able to access other websites through our site via hyperlinks. When you do so, you are subjecting yourself to their privacy policies and data collection. Please read the privacy policies of those sites to ensure you agree with the terms before using such sites.

### 7.2. Sharing of Personally Identifiable Information with Third Parties – Our Disclosure Practices

Except under the following circumstances and otherwise as set forth in this Privacy Policy, we will keep your Personally Identifiable Information private and will not sell it or share it with third parties.

### 7.3. Disclosure in Connection with Services

We will disclose your Personally Identifiable Information to those who provide services to us in the operation of our business such as the performance of technical, administrative and data processing tasks such as hosting, billing, fulfillment, and data storage and security.

### 7.4. By Law or to Protect Rights

We disclose Personally Identifiable Information when required to do so by law, or in response to a subpoena or court order, or when we believe in our sole discretion that disclosure is reasonably necessary to protect our property or rights or the property or rights of third parties or the public at large.

### 7.5. Legally Required Law Enforcement, Judicial and Administrative Agency Disclosures

We will disclose Personally Identifiable Information as necessary to comply with judicial and administrative orders, subpoenas, Civil or Criminal Investigative Demands, Administrative and Regulatory Demands and other legal obligations. In order for us to conduct business in certain jurisdictions, we may be required to disclose certain Personally Identifiable Information to regulatory authorities in such jurisdictions. Such information may include, but is not limited to, income information, name, address, email address, and other contact information.

### 7.6. Fraud Prevention

We may share Personal Information necessary to the prevention of fraud, illegal activities, and security breaches. Because of this, it's possible some of your personal information may be shared with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details of this fraud may be passed on to these agencies.

### 7.7. Business Transfers; Bankruptcy

We reserve the right to transfer all Personally Identifiable Information in our possession to a successor organization in the event of a merger, acquisition, or bankruptcy or other sale of all or a portion of our assets. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred Personally Identifiable

Information will be subject to this Privacy Policy, or to a new privacy policy if you are given notice of that new privacy policy and an opportunity to affirmatively opt-out of it. Personally Identifiable Information submitted or collected after a transfer, however, may be subject to a new privacy policy adopted by a successor organization.

### 7.8. Unpaid Accounts

If you fail to pay any balance owed to us for products ordered or services that we provide to you, we may, as permitted by law, report your Personally Identifiable Information, including without limitation your unpaid balance, to consumer credit reporting services, collection agencies and others.

### 7.9. Lead Assignment

If you join as a Brand Partner or Preferred Customer—or register as a customer and order products—without having been introduced by a Brand Partner, we may assign you to a Brand Partner and share **your contact information** with that person. Likewise, if you are a Brand Partner and a new Brand Partner, Preferred Customer or other customer is assigned to you, **your contact information** may be shared with that individual so they can contact you as their point of support. Our lawful basis is **contract performance** (where necessary to provide services you request) and/or our **legitimate interests** in operating the network efficiently. You may **object** when we rely on legitimate interests (see “Your choices” below).

### 7.10. Why we share and what we share

Amare Global is a network marketing company. To operate our network and support you, we may share **limited contact and account information** with **Independent Brand Partners** (and, where applicable, with prospective customers/Brand Partners you are introduced to). Depending on the feature, this can include: **name, contact details** (e.g., phone, email, address), **location**, **your role/status** (prospective customer, Preferred Customer, Brand Partner), **sponsor/upline information**, and **sales/enrolment metrics** necessary to manage the network. We **do not** share full payment card numbers or CVV. Our sharing follows the principles of **data minimisation** and purpose limitation.

### 7.11. Brand Partner Locator Feature

Our website may offer a **Brand Partner Locator** so that a prospective customer or Brand Partner can find a nearby Brand Partner. **Inclusion in any public locator/directory is strictly opt-in** for the Brand Partner whose details are displayed. If you opt in, we will display the contact details you choose (e.g., telephone number, address and/or email). You can **change your preference or withdraw** from the locator at any time via account settings or by contacting us. If you use the locator as a prospect, we may provide you with the **selected Brand Partner's** name and contact information so you can get in touch.

### 7.12. Downline Activity/Genealogy Reports

Amare Global is a network marketing company. Therefore, we provide certain information to Brand Partners regarding other Brand Partners and Preferred Customers and other registered customers enrolled in a Brand Partner's downline marketing organization (sales team). To help Brand Partners manage their independent businesses, we provide our Brand Partners with some of the Personally Identifiable Information of the other Brand Partners whom they have personally sponsored/enrolled as well as other Brand Partners who are on their marketing teams. If you enroll as a Brand Partner or register as a Preferred Customer or other customer, your name, address, telephone number, and email address, as well as data relating to your sales, purchases, and recruitment activity may be disclosed to the Brand Partner who sponsored you and to other Brand Partners who are upline to the Brand Partner who sponsored/enrolled you. When enrolling, you have the choice of limiting the Personal Information about you that is shared. Such information is shared via the Brand Partner Back-Office. Information relating to downline Brand Partners is made available to upline Brand Partners subject to a confidentiality and non-solicitation covenant in the agreement that each Brand Partner enters into with us. However, we do not warrant that Brand Partners will adhere to the confidentiality and non-solicitation covenants, and we shall not be responsible for any Brand Partners' violation of these covenants. By enrolling as a Brand Partner or registering as a Preferred Customer or other customer, you consent to the disclosure of your Personally Identifiable Information as described in this paragraph.

### 7.13. Surveys Conducted by Third Parties

It may become necessary to conduct surveys of our customers or Brand Partners. Should we deem it necessary to conduct a survey, we may outsource the survey to a third party. In that event we will provide the third-party survey company with certain of your Personally Identifiable information as is necessary for the third-party survey company to conduct the survey and to those third parties whom we engage to review and analyze the results of the survey. We will not provide your social security number, credit card or banking information to the survey provider.

## 7.14. Roles & responsibilities.

Independent Brand Partners are independent business owners. For information they **receive** from us to support the network, they must use it **only** as permitted by our agreements and applicable law. Where a Brand Partner separately determines purposes and means for using your data (e.g., their own marketing outside our instructions), they may act as a **separate controller** and must provide their **own privacy information** and lawful basis.

**Your choices and right to object.** Where we rely on **legitimate interests**, you may **object at any time**; we will assess your objection and stop or limit processing unless we have compelling legitimate grounds or need the data to establish, exercise or defend legal claims. You also have an **absolute right to object to direct marketing and any related profiling**—if you object, we will stop that processing. To exercise your rights, contact [privacy@amare.com](mailto:privacy@amare.com) (see Section 11).

**International transfers.** If sharing under this section results in transfers of personal data **outside the UK**, we will apply the safeguards described in **Section 4.2 – International Transfers (UK)** (e.g., UK adequacy, **UK-US Data Bridge**, **IDTA/UK Addendum**).

**Retention.** Information shared and reports generated under this section are **retained** in line with **Section 10.4 – Data Retention**.

We require recipients to:

- use the data **only** to support you and operate the network;
- keep it **confidential** and secure; and
- honour any **opt-out/objection** you make that is notified to them.

## 8. How to manage marketing messages you receive

We send marketing by email or SMS only when the law allows it. Under the UK Privacy and Electronic Communications Regulations (PECR), we may contact you either where you have given us consent, or where the soft opt-in applies (you gave us your contact details during a sale or negotiations for a sale, we market our own similar products/services, and you were offered a simple opt-out both at collection and in every message).

<https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guidance-on-direct-marketing-using-electronic-mail/what-are-the-rules-on-direct-marketing-using-electronic-mail/>

You're always free to change your preferences or opt out of marketing at any time by using the unsubscribe link included in all our marketing emails/SMS, or by contacting us. We do not disguise our identity and we provide a valid contact address for opt-out requests in every message, as required by PECR. <https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guidance-on-direct-marketing-using-electronic-mail/what-are-the-rules-on-direct-marketing-using-electronic-mail/>

What we send. Our marketing messages may include updates on our latest and existing products or services, exclusive offers and other promotions that may be relevant to you. When we rely on the soft opt-in, this marketing is limited to our own similar products/services. <https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guidance-on-direct-marketing-using-electronic-mail/what-are-the-rules-on-direct-marketing-using-electronic-mail/>

Service messages are unaffected. Opting out of marketing will not stop essential service-related communications such as order confirmations, delivery updates or important notices needed to perform our contract with you; these are service messages, not marketing. <https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/direct-marketing-guidance/identify-direct-marketing/>

No bought-in lists. We do not send electronic marketing to individuals based on bought-in lists unless each person on the list has given specific consent to receive that type of message from us. <https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guide-to-pecr/electronic-and-telephone-marketing/using-marketing-lists/>

If you opt out. If you decide to stop receiving marketing emails/SMS, we will promptly action your request and keep your details on a suppression (do-not-contact) list to ensure you are excluded from future marketing mailings. This minimal record is kept solely to honour your objection. <https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guide-to-pecr/electronic-and-telephone-marketing/using-marketing-lists/>

Your rights. You have an absolute right to object to direct marketing and any related profiling at any time; if you object, we will stop processing your data for these purposes. <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-object/>

Note: Under PECR, “electronic mail” includes emails and SMS/texts (and similar stored messages). <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-object/>

## 9. Third party advertisers

Finally, we may disclose anonymous information about user habits to third party advertisers on our site.

## 10. How we secure active and passive information

We secure your personal information submitted by you by using reasonable efforts to prevent unauthorized access or disclosure, or accidental loss of Active and Passive Information. Individual postings on this site and other communications to our office via email or standard mail may not be secure unless we advise you that security measures are in place prior to your submission of information. Therefore, if you choose to communicate with us through these means, you are assuming the risk of doing so and we respectfully request that you do not send or post sensitive information through these means.

### 10.1. Protecting Your Information

We acknowledge your trust and are committed to take reasonable steps to protect Personally Identifiable Information provided from loss, misuse, and unauthorized access. We employ physical, electronic, and managerial processes to safeguard and secure your information.

It is your responsibility to safeguard the password you use to access our Site and to promptly advise us if you ever suspect that your password has been compromised. We strongly encourage you to change your password regularly to prevent unauthorized access. Because your identification number and password are specific to you, you acknowledge sole responsibility for any and all use of our Site conducted with your identification number and password.

### 10.2. Links to Other Websites

Links to third-party websites may be provided solely for your information and convenience or to provide additional shopping for various other goods and services through our Merchant and Services Partners. If you use these links, you will leave our Site. This Privacy Statement does not cover the information practices of those websites nor do we control their content or privacy policies. We suggest that you carefully review the privacy policies of each site you visit.

### 10.3. Children's Privacy Protection

We take special care to protect the privacy of children and encourage parents to be active participants in their child's online activities. **Our services are not intended for individuals under 18**, and we do not knowingly collect, use or share personal data from anyone under 18. Please do not provide any personal, sensitive or financial information if you are under 18.

If we learn that we have collected personal data from a person under 18, we will delete it promptly. If you believe a child has provided personal data to us, please contact [cs.gb@amare.com](mailto:cs.gb@amare.com).

**Note (UK rule on children's consent):** Where an online service relies on **consent** and is offered **directly to a child**, only children **aged 13 or over** can lawfully provide their own consent in the UK; under 13 requires **parental consent**. We do **not** offer our services to children.

### 10.4. Data Retention

We keep personal data **only for as long as necessary** to achieve the purposes explained in this Privacy Policy, including to meet legal, accounting and reporting requirements. When determining retention, we consider the **type and sensitivity** of the data, the **risk of harm** from unauthorised use or disclosure, the **purposes** for processing and whether these can be achieved by other means, and **legal obligations**.

#### Typical retention periods

- **Orders, accounts & contracts:** core records kept for **up to 6 years** after the end of the financial year they relate to (Companies Act / HMRC).
- **VAT records:** typically **6 years** (or longer if HMRC instructs).

- **Customer support records:** usually **up to 3 years** after case closure (to handle queries and defend legal claims).
- **Marketing preferences:** kept until you **withdraw consent or object**; we keep a minimal **suppression (do-not-contact) record** to honour your opt-out.
- **Website logs/analytics cookies:** per our Cookie Policy, typically **12–24 months** or as stated for each tool/cookie.
- **Litigation/claims:** we may retain relevant data for the **statutory limitation period** to establish, exercise or defend legal claims.

We may **anonymise** data for statistics and insights; **once truly anonymised so that you are no longer identifiable, the UK GDPR no longer applies**. If we pseudonymise data, we will treat it as personal data while it remains re-linkable to you. We review retention periods regularly and securely delete or anonymise data when it is no longer needed.

## 11. Right of access, correction, erasure, and restriction

Under the UK GDPR you have the right to: **access** your data; **rectify** inaccurate or incomplete data; request **erasure** in certain circumstances; **restrict** processing; **object** to processing (including an **absolute right to object to direct marketing and any related profiling**); and **port** your data to another controller where the legal conditions are met. You also have rights in relation to **automated decision-making, including profiling**. We explain how to exercise these rights below.

### 11.1. Updating Your Information and exercising your rights

Ensuring that we have your correct and current personal information is important. Please tell us about any changes. You may also exercise any of your UK GDPR rights **verbally or in writing** (including via email), and you do not have to use a particular form of words.

- **How we respond & timelines.** We will respond **without undue delay and within one month** of receiving your request. Where requests are **complex** or you make **multiple** requests, we may extend by **up to two further months**; if so, we will notify you within one month and explain why.
- **Identity verification.** We may ask for information **only as necessary** to verify your identity.
- **Fees.** We do **not** charge a fee for handling rights requests. We may charge a **reasonable** fee or refuse a request **only** if it is **manifestly unfounded or excessive** (we will explain our reasons and how to complain).
- **Data portability (where applicable).** If we process your data **by automated means** and our legal basis is **consent or contract**, you can ask us to provide it in a **structured, commonly used and machine-readable format** or to transmit it to another controller where technically feasible.

To exercise any of these rights, please contact our Data Protection Officer at [privacy@amare.com](mailto:privacy@amare.com) We will keep a minimal **suppression (do-not-contact) record** if needed to respect any marketing opt-out you make.

### 11.2. Right to Withdraw Consent

Where we rely on your **consent**, you may **withdraw it at any time**. Withdrawing consent does **not** affect the lawfulness of processing carried out **before** withdrawal, and it will always be **as easy to withdraw as to give**. You can withdraw by using the tools provided (e.g., unsubscribe links) or by contacting us at [privacy@amare.com](mailto:privacy@amare.com)

### 11.3. Recourse, Enforcement and Liability

We maintain internal measures to check and improve our data-protection compliance. If you have **questions or concerns** about how we handle your personal data, please contact [privacy@amare.com](mailto:privacy@amare.com) first so we can help resolve them.

If you remain dissatisfied, you have the right to lodge a complaint with the UK Information Commissioner's Office (ICO):

**Phone:** 0303 123 1113

**Online:** <https://ico.org.uk/make-a-complaint/>

We will cooperate with the ICO and any competent supervisory authority in investigating and resolving complaints. You also have a right under **Article 77 UK GDPR** to complain to a supervisory authority if you consider that our processing of your personal data infringes data-protection law.

#### 11.4. Dispute Resolution

You can complain to the ICO if you believe we have not handled your request or your data properly. The ICO's helpline is **0303 123 1113** and further information is available at [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint). Government guidance also confirms that you should contact the organisation first and then the ICO if you are unhappy with our response.

#### 11.5. How to contact us

Please address any question or concern regarding our Privacy Policy or our practices concerning Personal Data by contacting us through email at: [privacy@amare.com](mailto:privacy@amare.com)

or writing to:

Attention Privacy Department  
Amare Europe B.V.  
Strawinskylaan 903, 1077XX Amsterdam  
Amsterdam, The Netherlands

### 12. Changes to this policy

The Amare Global's Privacy Policy may be amended from time to time in compliance with the requirements of the GDPR and other relevant legal principles. Any updates or changes to the terms of this Privacy Policy will be posted on our Site and the date of the newest version posted below. Please check back frequently, especially before you submit any Personally Identifiable Information at our Site, to see if this Privacy Statement has changed. By using our Site, you acknowledge acceptance of this Privacy Statement in effect at the time of use. When material changes or amendments are made to the Privacy Policy, we will announce the same at our home page for a period of 30 days following implementation of the amended Privacy Policy.

YOUR USE OF OUR SITE OR PROVIDE US WITH INFORMATION MEANS THAT YOU ACCEPT THE PRACTICES SET FORTH IN THIS POLICY. YOUR CONTINUED USE INDICATES YOUR AGREEMENT TO THE CHANGES.

#### 12.1. Online Privacy Policy Only

Except as otherwise specifically addressed herein, this Privacy Policy applies only to information collected through the Website. It does not apply to information collected offline.

### 13. Effective date

The effective date of this Privacy Policy is October 01, 2025.