

## PRIVACY POLICY

At Zavienta (“**Zavienta**”, “**We**”, “**Us**”, “**Our**”), We are committed to protecting the privacy and personal information of Our readers, subscribers and users who engage with Our digital services through Our website, including access to content, embedded affiliate links and collaboration interfaces (“**Services**”).

For the purpose of this Privacy Policy (hereinafter referred to as “**Policy**”), individuals or entities utilizing Our Services are referred to as (“**You**”, “**Your**”, or “**User**”). By accessing or using Our Services, You agree to the practices described in this Policy and Our Terms and Conditions.

When a customer uses the Services mentioned on Our website (“**Platform**”), We collect and process information in accordance with this Policy and Our Terms of Service. You may download a printable copy of this Privacy Policy ([PDF here](#)).

*Notice for residents of California, Colorado, Connecticut, Virginia, Utah, Oregon, Texas, Montana, Iowa, Delaware, Nebraska, New Hampshire, and New Jersey. This Privacy Policy outlines how We collect, use, disclose, retain, and, where applicable, sell or share Your personal information when You engage with Our Services. It also sets forth the privacy rights available to You under applicable state laws and how You may exercise those rights.*

*For more detailed information regarding Your rights, including those afforded under California and other relevant state privacy laws, please refer to the section titled “What are Your rights.” This section provides guidance on how You may opt out of the sale or sharing of Your personal information, including the use of Your data for targeted advertising. It also describes how You may limit or opt out of the use and disclosure of Your personal information, and how You may access, correct, delete, restrict, object to, or request the portability of Your personal information. We are committed to upholding Your privacy rights at all times and providing transparent means for You to exercise control over Your personal data.*

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1. **Information We collect**

To enable Our Services, We collect Your information in several ways that may include the data You directly submit to Us while subscribing or submitting forms, data We automatically gather while requesting, engaging, or participating in Our Services, including Your preferences and objectives, and data We may receive from third-party sources.

- 1.1. When You engage with Our Platform and interact with the Services, such as by subscribing, participating in promotions, submitting inquiries or editorial contributions, You may provide personal information such as Your name, email address, contact details, social media usernames, and any other details You elect to disclose such as photographs and audio/video recordings. This information is collected with Your consent and is used to fulfill the purpose for which it was submitted, in accordance with applicable laws.
- 1.2. Additionally, We automatically collect certain information when You access the Platform. This includes but is not limited to technical data like IP address, browsing type, usage behavior, the links You click and details about the device through which You access the Platform and engage with the Services, including Your preferences and objectives.
- 1.3. We may also obtain Your information from third party sources like social media platforms, marketers, financial and transactional information such as payment and transaction history collected by Our third-party payment processors for Our record purposes.

- 1.4. While accessing the Services, You may post comments, editorial contributions and User-generated content including articles, photographs and videos. You agree and acknowledge that such information is not confidential, and We may use it for marketing and promotional purposes.
- 1.5. We may also collect general location information based on the IP address of Your operating device to enable location-based features. Such access will be requested in accordance with Your device settings and applicable law.

## 2. **How do We collect information through cookies?**

- 2.1. We automatically collect information such as IP address by using cookies on Our Platform.
- 2.2. At Zavienta, We may use the following cookies, including but not limited to:
  - (i) Essential cookies. These are necessary cookies for optimum delivery of Services, such as enabling access and transition to different features and sections on the Platform.
  - (ii) Analytics cookies. These are required only to enhance Your user-experience on Our Platform.
  - (iii) Personalisation cookies. These cookies are used to retain Your preferences of language and to make features like *recently viewed* and *similar contents* available on the Platform.
- 2.3. While You can manage or turn off cookies in Your browser settings, this may impact Your accessibility to the Services.

## 3. **How do We use Your information?**

We use the collected information to:

- 3.1. deliver, manage Our Services and communications, provide tailored editorial recommendations, offer customer support, provide subscriptions and manage Our Platform;
- 3.2. enhance and personalize Your experience on the Platform, by tracking the features on Our Platform that interest You and for the purpose of offering You the latest announcements, promotions;
- 3.3. improve Our Services and to implement quality control across the Platform by conducting internal research on User interactions and targeting demographic audiences, advertisements and for the purpose of bug detection and error reporting;

- 3.4. enforce Our Terms of Service and protect against fraudulent, unauthorized or illegal activities and to comply with applicable laws and regulations;
- 3.5. communicate to You about Our Services, updates, and to notify You with the changes in Our Privacy Policy and Terms of Service; and
- 3.6. additionally, Zavienta may also use Your information for specific purposes, subject to Your explicit consent and in accordance with applicable legal requirements and procedures.

#### 4. **When do We share Your information?**

We do not sell, rent, or trade Your information. We may share or disclose Your information, with Your consent to the following:

- 4.1 Service providers. Trusted third parties who assist Us in delivering Our Services (such as email marketing platforms, analytics provider, IT support, hosting providers, advertising partners, media houses, and payment processors).
- 4.2 Legal and regulatory authorities. When required by law, regulation, or legal process to protect rights and interests of Zavienta, Our Users, or others.
- 4.3 Affiliates and partners. We may share Your information with Zavienta's affiliated entities and internal business units for the purpose of facilitating the delivery of Services and to support operational efficiencies.
- 4.4 Business transfers. In the event of a merger, acquisition, or sale of assets, Your information may be transferred as part of the transaction.

All third parties are obligated to maintain the confidentiality and security of Your information.

#### 5. **Your privacy rights and choices**

Residents of *California, Colorado, Connecticut, Virginia, Utah, Oregon, Texas, Montana, Iowa, Delaware, Nebraska, New Hampshire, and New Jersey* are entitled, under their respective state privacy laws, to exercise specific rights regarding the processing of their personal information. Additionally, individuals located in the *European Economic Area (EEA)*, the *United Kingdom (UK)*, and *Switzerland* may be entitled to similar rights under applicable data protection laws. These rights may include, but are not limited to, the following:

- 5.1 Right to know. You may request detailed information regarding Our collection, use, disclosure, and processing of Your personal information, including, where applicable, a list of specific third parties to whom such personal information have been disclosed.

- 5.2 Right to access. You may request a copy of the personal information We maintain about You.
- 5.3 Right to correct. You may request that We rectify, correct, or update any inaccurate or incomplete personal information We hold about You.
- 5.4 Right to delete. You may request the deletion of Your personal information, subject to certain exceptions as permitted by law.
- 5.5 Right to opt-out of the sale or sharing of personal information. You may request to opt-out of the "sale" of Your personal information or the "sharing" of Your personal information for purposes of cross-contextual behavioural advertising and/or targeted advertising, as defined by applicable law.
- 5.6 Right to Limit the Use of personal information. Where applicable, You may request that We restrict or limit the use and disclosure of Your personal information.
- 5.7 Right to object. You may object to Our processing of Your personal information where such processing is based on legitimate interests, or for direct marketing purposes.
- 5.8 Right to withdraw consent. Where Our processing of Your personal information is based on Your consent, You have the right to withdraw such consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- 5.9 Right to data transfer. You may request that We transfer your personal information to You or to a third party of Your choice in a structured, commonly used, and machine-readable format, subject to certain conditions.
- 5.10 Right to non-discrimination. You have the right not to receive discriminatory treatment for the exercise of any of the above rights.
- 5.11 Right to lodge a complaint. You may file a complaint with Your local data protection authority if You believe We have infringed your rights under applicable privacy laws.

These rights are not absolute and are subject to a limitation under applicable law. In the event of Your request for deletion, We may retain Your personal information to process Your subscription and records of Your request and Our response.

## 6. **What are Your rights?**

You have the following rights:

- 6.1 Request a copy of Your information. You may request a copy of the personal information We hold about You. We will respond within a reasonable timeframe, subject to ID verification.

- 6.2 Correction of Your personal information. If You believe the information We hold is inaccurate, outdated, incomplete, or misleading, You may request a correction. If We cannot correct the information, We will provide a written explanation and allow You to request a statement be attached to Your record noting the correction request.
- 6.3 Deletion of Your information. You may request deletion of Your personal information if it is no longer needed, You withdraw Your consent, or no legal basis remains for retention. However, We may retain certain data to comply with legal or regulatory obligations.
- 6.4 File complaints for violation. You have the right to file a complaint with the appropriate data protection authority at any time if You believe Your data rights are violated.
- 6.5 Unsubscribe from communication. You can opt out of marketing emails anytime by clicking “unsubscribe” However You will still receive essential service-related messages.
- 6.6 Restriction and objection. You may restrict Us from using or processing Your data under certain circumstances and You may withdraw Your prior consent in respect of any specific purposes at the Platform.

You can exercise any of Your rights in this Policy at any time by contacting Us at [legal@zavienta.com](mailto:legal@zavienta.com). You agree that We may need to verify Your identity before complying with such requests and exercise of such rights as enlisted above may impact Your access to the Services and the Platform. You may have a right to appeal a decision We make relating to requests to exercise Your rights under applicable local law. To appeal a decision, please contact Us in accordance with the Contact Us section of this Privacy Policy.

## 7. **How do We protect Your information?**

We prioritize the security of Your personal information through the usage of secure servers, anti-virus software, access control tools, and privacy impact assessments. To further ensure data protection, We adopt the following measures:

- 7.1. Encryption. We employ industry-standard encryption on all data, both at rest and in transit.
- 7.2. Your personal information stays Private. Your personal information remains strictly private and is used only for the purpose of assisting You.
- 7.3. Safe data disposal. We retain Your information only so long as legally required and during this period, data will only be disposed of upon Your explicit request, subject to applicable legal and regulatory requirements. Once it is no longer needed, it is securely disposed of.

We take extensive measures to protect Your information and ensure the security of Our Platform.

## 8. **De-identified data**

Zavienta may, at Our sole discretion, de-identify the information collected by modifying data elements and removing identifiers, such that the information can no longer reasonably be linked to You or Your operating device. You agree and acknowledge that such de-identified data is not subject to the limitations of this Policy and We may use or disclose it for lawful purposes without restriction.

## 9. **Online analytics and advertising**

9.1. *Online analytics.* As part of Our Platform, Zavienta may engage third-party analytics providers, including but not limited to Google Analytics, to collect and analyze data regarding Your interaction and access to the Services. These analytics may use tracking technologies to collect Your usage and navigation patterns, use of affiliate links and Your activities across websites including features and particular sections of the Platform that aligns with Your interests. Such data collection is solely to understand User behaviour and improve the delivery of Our Services.

9.2. *Advertisements.* You hereby acknowledge that as part of the Services, Zavienta may permit third-party advertising networks to deploy cookies and other tracking technologies on Our Services for the purpose of delivering personalised advertisements based on Your browsing activity and inferred interests. To facilitate this, We may share hashed or otherwise de-identified identifiers (such as email addresses) with Our advertising partners to serve relevant ads aligned with Your interests.

9.3. Zavienta does not control these third-party tracking technologies or data practices, which are governed by their respective privacy policies.

9.4. In the event You wish to opt out of interest-based advertising, You may write to Us, at [legal@zavienta.com](mailto:legal@zavienta.com) and to manage Your preferences for Google Display ads, kindly visit <http://www.google.com/settings/ads>.

## 10. **Financial incentives**

10.1. Zavienta may offer certain benefits to You with financial incentives or preferential pricing in exchange for the provision of certain personal information, such as Your name, email address, or marketing preferences. For example, You may receive access to exclusive content, discounts, newsletters, or other benefits when You sign up for an account, subscribe to our communications, or participate in promotional campaigns (each, a “**Program**”). California and other states may consider this Program to be a financial incentive or loyalty program. Participation in any Program is entirely voluntary and subject to Your informed and revocable consent. You have the right to withdraw from a Program at any time by contacting us at [legal@zavienta.com](mailto:legal@zavienta.com).

- 10.2. The value of the Personal Information collected in connection with a Program is reasonably related to the value of the benefits provided.

## **11. Children's privacy**

- 11.1. At Zavienta, Our Services are not structured or directed towards children below the age of thirteen (13), and We do not intentionally collect, process or retain personal information of such individuals. Should it come to Our attention about an inadvertent information collection from a child under thirteen (13) years of age without the necessary lawful authorization, We shall immediately eliminate such data from Our systems and ensure compliance with relevant privacy regulations under applicable laws.
- 11.2. To the extent We obtain actual knowledge that a User is at least thirteen (13) years of age but under sixteen (16) years of age, We will seek affirmative authorization from the individual before selling or sharing their personal information, where required under applicable law.

## **12. Third-party links**

Our website may contain links to third-party websites or resources. These links are provided solely for Your convenience and do not imply any endorsement or affiliation by Zavienta. We encourage You to review the terms and privacy policies of any third-party websites You visit.

## **13. How long do We retain Your data?**

We retain Your data only so long as it is necessary for Us to undertake business or as may be required by law. We retain Your data in physical form, electronic form, or a mix of both. During this retention period, We do not sell or share Your data, except as stated in this Policy.

## **14. Additional information for California Users**

- 14.1. If You are a California resident, the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"), provides You with certain rights regarding Your personal information.
- 14.2. We are required to inform You about the categories of personal information We hold about You and the purpose of such collection; the types of third-parties with whom We share Your personal information for business purposes; and whether We sell Your personal information in exchange for money or other consideration or We share Your personal information for personalized advertising based on Your interaction with the Platform.
- 14.3. In accordance with this Policy, We collect Your personal information such as contact details, content submissions and usage data for providing the Services and personalizing



Your experience aligned with inferred interests. Depending on the category, this information may be disclosed to service providers, advertising partners, affiliated entities, and legal authorities.

- 14.4. We do not “sell” Your personal information in the traditional sense, and We do not use or disclose sensitive personal information except as allowed under applicable CCPA exceptions.
- 14.5. In addition, Your rights under CCPA include the right to request deletion, correction of Your personal information, the right to opt-out for sharing and selling of such information and the right to not be discriminated against for exercising any of Your privacy rights.
- 14.6. In accordance with California’s Erasure Law, *Business and Professions Code* §§ 22580–22582, individuals under the age of 18 who are registered Users and California residents have the right to request removal of content or information they have publicly posted on the Platform, that are directed to Users aged 13 through 17. You can request the removal of such content and Zavienta shall take reasonable steps to delete the content or make it inaccessible to the public, however a copy of such content may be retained on the servers controlled by Us and We cannot prevent content that has already been copied or shared by third parties from continuing to exist or circulate outside Our Platform.
- 14.7. Under California’s “Shine the Light” law (*California Civil Code* § 1798.83), residents of California may, in certain cases, request information regarding the sharing of specific categories of their personal information with third parties for their direct marketing purposes.
- 14.8. To exercise Your rights or opt out of the sharing of Your personal information, please see the Contact Us section below.

## 15. **International transfers**

- 15.1. While accessing the Platform, Your personal information may be stored and processed on servers located beyond the country or jurisdiction You reside. The privacy laws may not be consistent in these countries in terms of protection and rights they offer. Where applicable and required by law, We implement appropriate safeguards for such international transfers, including the use of Standard Contractual Clauses (SCCs) or equivalent legal mechanisms recognized under relevant data protection laws. When required by law, We take appropriate measures to implement standard data protection and privacy safeguards.
- 15.2. We process Your personal data on the basis of various legal grounds, depending on Your particular jurisdiction. These include, signing a contract with You upon Your engagement for a specific event, complying with legal requirements by relevant authorities, pursuing legitimate business interests and obtaining Your explicit consent. You may withdraw Your consent at any time by writing to Us at [legal@zavienta.com](mailto:legal@zavienta.com).

## 16. **Agreement to Terms and Privacy Policy**

By using Our Platform, You agree to this Privacy Policy and Our Terms of Service.

## 17. **Opt-out Policy**

17.1. *Opt-out from receiving information.* If You do not wish to receive information from Us, or marketing emails, You may choose to opt-out by writing to Us at [legal@zavienta.com](mailto:legal@zavienta.com).

17.2. *Do Not Track (DNT).* Your web browser setting may offer an automatic “Do Not Track” (“DNT”) signal to the websites and online platforms You access. DNT is a concept promoted by U.S. Federal Trade Commission (FTC), for the internet industry to implement a mechanism allowing internet users to control and restrict their online activities to be tracked. Akin to many other businesses, currently We do not identify or respond to these DNT signals due to lack of technological standards. However, We are committed to provide You with reasonable privacy options and rights as per the limitations of this Policy.

## 18. **Modifications to the Privacy Policy**

We reserve the right to update Our Policy. The date on which the Policy is updated is mentioned at the top of this page. It is advisable to conduct a periodic review of this Policy, as it is subject to updates at various intervals.

In the occurrence of significant modifications, We shall undertake reasonable measures to inform You through the email address maintained in Our records and You will be given an option to opt out of sharing Your personal information with Us.

## 19. **Contact Us**

If You have any queries/questions regarding the privacy aspects of Your personal information, please contact Us at:

For residents of United States of America:

Email: [legal@zavienta.com](mailto:legal@zavienta.com)

Phone: +19175124855

For residents of UK/EU and Switzerland:

You may contact Our Data Protection Officer at [legal@zavienta.com](mailto:legal@zavienta.com).