

PRIVACY POLICY

Update date: 08-06-2022

1. PURPOSE

This section illustrates the commitment of CASTALIS through its website available at the following URL: www.brulafine.com (the "Site"), with regard to the respect of your private life and the protection of your personal data (the "Data"), collected and processed during your use of the Site and the Services under the conditions set out in our General Conditions of Use and Sale (available in the "G.C.U." and "G.C.S." sections of the Site).

The present Charter was thus elaborated, to:

- Inform you, in advance and in full transparency, about the Data that may be collected and the use that may be made of it;
- Allow you to navigate on the Site and use the Site's functionalities in complete confidence;
- Inform you of your rights concerning the Data that will be collected about you, in the event that you give your consent to their processing by checking the acceptance box provided for this purpose.

2. CONTENT SENT TO THE SITE

All personal information that you voluntarily put online (in your profile or in messages) is not accessible to the public and cannot be collected and used by third parties.

3. DATA COLLECTED

The Data collected and subsequently processed by our Site are those that you voluntarily transmit to us when you open your User account (the "Account"), via the Registration Form, and concern at least:

- Your last name(s) and first name(s);
- A valid email address, which is your identifier (User name) to access your Account and our Services;
- A password chosen by you.

Your consent to the processing of your Data transmitted at the time of the opening of your Account via the Registration Form will result from checking the acceptance box provided for this purpose, on the Site. Some advanced features of the Site may, for authentication purposes, require you to provide additional Data, such as your telephone number and your postal address, in particular in the context of your subscription to the Slimming Coaching Services and/or your purchases of Castalis Products (see our General Terms of Sale).

Your prior acceptance will then be required again, by checking the box provided for this purpose, at the level of the activation of the advanced features of the Site which require these Data. You may, of course, refuse to provide such additional Data, but such refusal may prevent access to the advanced features of the Site that require such Data.

The Data automatically collected by the Site is your IP address (the Internet address of your computer), which is associated with your browser version, the address of the page displayed, and the date of the request.

In addition, browsing the Site may result in the automatic installation of cookies on your computer. Cookies are small texts sent by a website to your browser and stored on your computer. In this case, they allow our servers to identify you and thus offer you personalized information and automatically connect you to our services. They are therefore only used to simplify navigation and improve the

ergonomics of the Site.

However, you can refuse the installation of cookies on your computer by modifying the relevant parameters of your Internet browser, but such a refusal may prevent access to certain services on the Site.

These cookies and their use are subject to a specific Charter established by Castalis that you can consult now in the "Cookies" section of the Site.

4. PURPOSES OF THE PROCESSING

The Data identified as mandatory in the Registration Form is necessary to benefit from the features of the Site.

We will use this information to manage and maintain our Site, to allow you to benefit from personalized features, and to process any reports or correspondence from you.

The Data collected automatically by the Site allows us to perform web page viewing statistics.

We do not use your e-mail address or any other personally identifiable information without your consent to send you advertising or marketing messages, except as part of a specific program or feature that you may choose to enable or disable.

However, we may use your email address without your consent for the following purposes:

- Registration as a member of the Site: the new user member receives a welcome e-mail containing a link to activate his or her account;
- Validation of order: the User receives an email confirming his/her order, including details of the products ordered, the postal address for receipt, and telephone contact details;
- Validation of the Coaching account: the User receives an e-mail confirming the creation of his access to personalized coaching, including his connection data;
- Reset of the password: the User, in case of loss of his password, can make a request to reset his password, and an email of reset will be sent to him;
- Modification of the password: each time the User changes his password, an e-mail confirming the action will be sent;
- Closing the Account: in the event of a request made to Castalis by the User for the permanent closure or temporary deactivation of his/her Account, a notification e-mail may be sent by the Site to inform the User of the completion of the requested operation;
- Events, Games, and Contests: Castalis may send emails to the User to inform him/her of the existence of games and contests or special events organized by the Site;
- Information about the Site and the Services offered: Castalis may send the User e-mails to inform him of the evolution of the Site, send him newsletters and notifications of the Services he has registered for;
- Request for assistance or submission of questions/suggestions: Castalis responds by e-mail to Users who request assistance to log on to the Site, modify or access their Account, or for any remark or suggestion submitted to Castalis through the "Contact Us" section available on the Site.

Important:

- None of the processing operations listed above is intended to lead to any automated decision-making, including profiling, concerning you;
- At certain times, we may ask for your consent to use your Data for certain specific purposes (new purpose, modification or deletion of existing purpose). You are, of course, free to decide whether or not to accept this request;
- At any time, you may decide to withdraw your consent to all or part of the processing listed above by changing some of the settings available on your Account profile page or by sending your request to the Company (in the context of the exercise of your rights as provided in Article 8 below). However, you should keep in mind that some parts of the Site and some Services will then be unavailable.

5. RECIPIENT OF THE DATA

Castalis is committed to protecting your privacy and the confidentiality of your Data.

Accordingly, we will never share or disclose your Data to third parties, except in the following limited situations:

- When we are obliged to do so by a judicial authority, police authorities, and generally by any administrative authority authorized by law;
- When you have given us your prior consent to share such information;
- When you violate our Terms of Use (we are thus able to transmit your IP address to the access providers for identification purposes - and thus obtain your eventual deregistration - or even, if we deem it necessary given the nature of your abuses, transmit your IP address directly to the competent authorities).

6. SECURITY AND RETENTION OF DATA

6.1. Security

Concerned about the trust that the User shows when he connects to our Site, we attach great importance to the security and protection of his Data and implement all the technical and organizational measures necessary to:

- Restrict the risks of loss, deterioration, or misuse;
- Prevent any violation of the same

Thus, in order to guarantee optimal security, Castalis uses the standard SSL (Secure Socket Layer) technology in 256 bits. The use of the SSL protocol, one of the most effective and widely used encryption methods currently in use, ensures maximum protection of your Data.

In addition, as part of this security policy, we inform you that:

- Your User account is protected by a personal password stored in an encrypted way in our database;
- A system of secure cookies is available to you to make any attempt to steal your cookies ineffective;
- Your e-mail address is only accessible to the administrator of the Site, as well as to our webmasters if you have given Castalis permission to contact you by e-mail;
- In accordance with the provisions of the RGPD, we will notify the supervisory authority ("Bulgarian Commission for Personal Data Protection") of any possible breach of personal data that we may suffer despite our security measures and will communicate to you, if applicable, any possible breach concerning more specifically your Data, if this breach entails a high risk for your rights and freedoms.

6.2. Duration of Data Retention

Your Data is stored at the Site's host and is kept for the time strictly necessary to manage the commercial relationship between us, in compliance with the purposes set out in Article 5 of this Charter, and only to the extent authorized by the regulations in force.

Beyond this duration, they will be anonymized and kept for statistical purposes and will not give rise to any exploitation, of any nature whatsoever.

7. PARTNER SITES

You may access, through the hypertext links on the Site, the sites of Partners which are not governed by the present Data protection provisions. You are therefore invited to examine the rules applicable to the use and disclosure of the information you provide on these sites.

8. RIGHTS TO ACCESS, MODIFY, AND DELETE YOUR DATA

Castalis complies with the regulations applicable to the processing of personal data and in particular the Bulgarian Personal Data Protection Act of 21 December 2001, as well as the European Data Protection Regulation No. 2016/679 of 27 April 2016 (hereinafter referred to as "RGPD").

Thus, in accordance with the Bulgarian Personal Data Protection Act and the RGPD, you have at any time:

- A right of access: you can, by proving your identity, obtain communication of the data concerning you and check their accuracy;
- A right of correction: in case of inaccuracy of this information, you can require that they are rectified, completed, updated, locked or deleted;
- A right to erasure ("right to be forgotten"): you can obtain the deletion, as soon as possible, of data concerning you;
- A right to the limitation of the treatment: you can, in certain cases envisaged by the regulation, obtain the limitation of the treatment of the data concerning you;
- A right to data portability: you can, under the conditions set out in the regulations, demand the transmission of your data to another data controller, without the Company that initially collected them being able to oppose it;
- A right of opposition: you have the possibility to object to your data being processed or to refuse the communication of information concerning you to third parties

For any additional information you may require on these protective provisions, or for any possible complaint to a supervisory authority, you may contact the Bulgarian Commission for Personal Data Protection, at the following address:

1 Dondukov Boulevard

1000 Sofia, Bulgaria

Phone: +359 2 940 2046

Fax: +359 2 940 3640

Email: kzld@government.bg

Website: <http://www.cpdp.bg>

In addition, we inform you that:

- You can choose not to transmit your Data on the Site. In this case, you will be able to browse freely on the Site, but some parts of the Site and some Services will be unavailable (for example, placing an order);
- At any time, you can update or correct your personal information on your Account profile page

9. CHILDREN'S PRIVACY

The Site and Services are available only to users who are 18 years of age or older. We, therefore, do not allow users under the age of 18, nor do we knowingly collect personal data from any person under the age of 18, who is subject to specific protection under the GDPR.

10. UPDATES TO THE PRIVACY POLICY

Castalis may modify this Privacy Policy at any time.

All changes to the Policy will be posted on this page. If the changes are material, Castalis will provide you with more substantial notice (e.g., email notification).

11. QUESTIONS, COMPLAINTS, OR SUGGESTIONS

We are committed to providing you with the utmost clarity, precision, and efficiency regarding the confidentiality of your Data. Therefore, if you have any questions, suggestions, or other concerns regarding the processing of your Data or the way Castalis collects and uses your Data, please do not hesitate to contact us via the "Contact Us" section of the Site.