



PRIVACY POLICY

Personal data processing policy

(in accordance with Federal Law No. 152-FZ of 27.07.2006 "On Personal Data")

1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter — the Policy) applies to all information that LLC "Toscana Food" (hereinafter — the Operator) may obtain about the User while using the website <https://evrionta.ru/ru>, the Evrionta mobile application, related services, delivery services, and order pick-up points (OPP).

1.2. The Operator ensures the protection of processed personal data from unauthorized access and disclosure in accordance with the procedure established by the applicable legislation of the Russian Federation.

1.3. By using the Website, the User expresses their agreement with the terms of this Policy. If the User does not agree with the terms of the Policy, they must cease using the Website.

1.4. This Policy applies to all personal data that the Operator may obtain about the User, including:

- in the process of filling out forms on the Website (including but not limited to: registration, placing an order, subscribing to newsletters, participating in surveys);
- when uploading laboratory test results and other medical indicators to the AI assistant;
- when transmitting data via QR code placed on the Website;
- when contacting the support service;
- when receiving goods at an OPP or via courier delivery.

2. What Personal Data the Operator Collects

2.1. Publicly available personal data:

- Last name, first name, and patronymic of the User;
- contact phone number;
- email address (e-mail);
- delivery address (postal code, city, street, building, apartment).

2.2. Special categories of personal data (processed only with separate written consent of the User):

- health information (complaints, symptoms, chronic conditions);
- laboratory indicators (blood, urine test results, etc.);
- physiological parameters (weight, height, age, sex, physical activity level);
- health goals (desired outcome from using Evrionta products).

2.3. Technical data (processed automatically):

- IP address of the User;
- browser type and operating system;
- cookie file data;
- information about the User's actions on the Website (page views, transitions, time spent);
- device information (model, OS version) when using the mobile application.

2.4. Payment data:

The Operator does NOT process the User's bank card data. Payment is made through a certified payment aggregator (acquiring service), which processes payment data independently in accordance with its own regulations and the PCI DSS standard.

3. Purposes of Personal Data Processing

3.1. Primary purposes:

- providing the User with access to the functionality of the Website and the Evrionta mobile application;
- generating personalized recommendation protocols based on data entered by the User (AI assistant operation);
- concluding and executing a sales contract for goods presented on the Website;
- delivering goods to the User via courier service or order pick-up points (OPP);
- processing payments through integration with the payment system (acquiring service);
- providing informational and technical support to Users;
- improving the quality of the Website, mobile application, and recommendation technologies.

3.2. Additional purposes (requiring separate consent):

- sending the User informational, advertising, and marketing messages (newsletters);
- conducting surveys and research for the purpose of improving the service;
- transferring anonymized data to partners for statistical analysis.

4. Legal Grounds for Personal Data Processing

4.1. The Operator processes the User's personal data only if at least one of the following grounds exists:

- the User's consent to the processing of their personal data (including special categories);
- the conclusion and execution of a sales contract to which the User is a party;
- processing of personal data is necessary for compliance with federal law requirements (in particular, tax and accounting records).

5. Procedure and Conditions for Personal Data Processing

5.1. Transfer of personal data to third parties:

The Operator is entitled to transfer the User's personal data to third parties in the following cases:

- delivery service (to fulfill the order) — only full name, phone number, and address are transferred;
- payment system (acquiring service) — only the order identifier and amount are transferred; payment data is not passed to the Operator;
- technical partner providing hosting and operation of the Website (servers located in the Russian Federation);
- upon request from authorized government authorities in accordance with the procedure established by the legislation of the Russian Federation.

5.2. Cross-border transfer:

All of the Operator's databases are located on servers situated in the Russian Federation. Cross-border transfer of personal data is not performed.

5.3. Retention periods:

The User's personal data is stored no longer than required by the purposes of their processing, but in any case no more than 5 (five) years from the date of the User's last interaction with the Operator, or until the User withdraws their consent.

5.4. Automated processing:

The Operator is entitled to process personal data both using automated means and without such means (in paper form).

6. User Rights

6.1. The User has the right to:

- obtain information about the processing of their personal data;
- request correction, blocking, or deletion of their personal data in cases of incompleteness, outdatedness, or inaccuracy;
- withdraw consent to the processing of personal data at any time;
- file a complaint regarding the Operator's actions or inactions with the authorized body (Roskomnadzor).

6.2. To exercise their rights, the User submits a written request to the Operator's address. The review period for such requests is 10 business days.

7. Withdrawal of Consent

7.1. The User may withdraw their consent to the processing of personal data at any time by sending a written notice to the Operator's postal address or by email to toscana.food@yandex.ru with the subject line "Withdrawal of Consent to Personal Data Processing."

7.2. Upon withdrawal of consent, the Operator is obliged to cease processing the personal data and destroy it within no more than 30 days from the date of receipt of the withdrawal notice, except in cases where the Operator is entitled to continue processing without consent pursuant to applicable law.

8. Personal Data Protection Measures

8.1. The Operator takes the following measures to protect personal data:

- appointment of a person responsible for personal data processing;
- issuance of internal policies on personal data processing matters;
- application of organizational and technical protection measures;
- monitoring of actions by employees with access to personal data;
- regular database backups.

9. Changes to the Policy

9.1. The Operator reserves the right to make changes to this Policy unilaterally. The current version of the Policy is always available at: <https://evrionta.ru/ru/privacy>

9.2. Continued use of the Website after changes have been made constitutes the User's acceptance of the new version of the Policy.

10. Operator Contact Information

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