

Corporate Website Privacy Notice

We take privacy seriously. This notice tells you who we are, what information about you we collect, and what we do with it. We will use information about you only in accordance with applicable data protection laws.

Please also read our terms of use relating to the service you are interested in. They provide more information about the way we do business, and any restrictions on eligibility that may apply.

Who are we?

We are a member of the Aspeya group of companies which comprises a number of companies or “affiliates”.

Our details (name, address, etc.) will have been given to you separately at the time of (or to confirm) the collection of information about you, for example, in a notice on an app or a website, or in an e-mail or sms, containing a link to this notice.

A list of entities that may be delivering this notice to you can also be found [here](#).

MORE DETAILS

- “We” (or “us” or “our”) refers to Aspeya, Inc. or its affiliate that first collected information about you.
- “Aspeya product” means a product of ours or one of our affiliates.

How do we collect information about you?

We may collect information about you in various ways.

- You may provide us with information directly (e.g. if you register to receive our press releases or e-mail alerts; when you submit content to a digital Aspeya touchpoint, or fill in a form, or make a call to us).
- We may collect information automatically (e.g. when you use our app or website).

In this notice, we refer to the methods by which you are in contact with us, e.g. apps and websites, as “*Aspeya touchpoints*”.

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We may collect information that you provide directly. Typically, this will happen when you:

- sign up to be a member of our databases (for example if you register to receive Aspeya press releases or e-mail alerts);
- submit content to a digital Aspeya touchpoint;
- contact us through a touchpoint, or by e-mail, social media or telephone; or
- participate in our surveys.

We may collect information about you automatically. Typically, this will happen when you:

- communicate with us (for example, through a touchpoint; or social media platforms); or
- use Aspeya touchpoints (e.g. through tracking mechanisms (such as cookies and web beacons/pixels) that you receive when you use the Aspeya touchpoint or get an e-mail from us);
- use third party websites (for example, using technology similar to that described in the bullet above, that you receive when you visit a Aspeya touchpoint or get an e-mail from us);

As mentioned above, we may collect information about you automatically through the use of cookies and similar tracking technologies (such as web beacons/pixels) that you receive when you visit digital Aspeya touchpoints or get an e-mail from us. The specific cookies and other mechanisms used will depend on the Aspeya touchpoint in question. To learn about these mechanisms used on a touchpoint, including how you can accept or refuse cookies, please see the information made available on or through that touchpoint. These mechanisms may include Google analytics cookies (see www.google.com/policies/privacy/partners/).

We may also collect information in other contexts made apparent to you at the time.

What information about you do we collect?

We may collect various types of information about you:

- information necessary to provide you with press releases or e-mail alerts
- information you give us when you submit content to a digital Aspeya touchpoint
- information about your visits to Aspeya touchpoints
- information you give us in calls you make to switchboards or call centres
- information about your preferences and interests
- information necessary to verify your identity, age, and location (where geo-fencing is applicable)

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Information that we collect from you directly will be apparent from the context in which you provide it. For example:

- if you submit content to a digital Aspeya touchpoint, you may provide your name, username, contact, image, location, interests and preferences, links to your professional profiles (e.g. LinkedIn or personal research pages);
- you may provide information on your preferences and interests so that we can offer you updates and services that will interest you;
- we may collect information that enables us to verify your identity and age.

Information that we collect automatically will generally concern:

- details of your visit or call (such as time and duration);
- your use of digital Aspeya touchpoints (such as the pages you visit, the page from which you came, and the page to which you went when you left, search terms entered, or links clicked within the touchpoint, when you first open the touchpoint, for how long you use it, and how you interact with messages or advertisements we send you); we may use cookies and similar tracking technologies (such as pixels/web beacons) to do this;
- your mobile or desktop device and software (such as your IP address or unique device identifier (for example, mobile advertising identifier (MAID) or Android ID (SSAID)), location data (either derived from your IP address or if you choose to share your precise location with us for specified purposes), device brand and model, the display settings of your monitor, web browser type, operating system, (some of which may be used in “digital fingerprinting” (see for what purposes we use information about you, below)) and details of any cookies (or similar technologies) that we may have stored on your device).

Information that we collect from third parties will generally consist of publicly-available profile information (such as your preferences and interests), for example from public social media posts.

For what purposes do we use information about you, and on what legal basis?

In this section, we describe the purposes for which we use personal information. However, this is a global notice, and where the laws of a country restrict or prohibit certain activities described in this notice, we will not use information about you for those purposes in that country.

Subject to the above, we use information about you for the following purposes:

- To comply with regulatory obligations, such as (where appropriate) verifying your age and location
- To administer our contract for user generated content with you (where you submit content to a digital Aspeya touchpoint)
- To provide you with, and customise your experiences of, press releases and e-mail alerts
- To understand whether you are still engaged with our communications and whether you wish to continue to receive them
- To enable you to use Aspeya touchpoints, and to customize your experiences of Aspeya touchpoints
- For general business administration, and to support all the above, including administering your accounts, corresponding with you, managing your appointments with us or with someone supporting us, fraud prevention (for example in the context of our events and surveys, to ensure that they are not attended/taken more than once by the same person, or in the context of e-

commerce to protect cardholder information), personnel training and quality control, and administration and troubleshooting

- For business analytics, statistical or scientific purposes, and improvements, including improving Aspeya products and services, Aspeya touchpoints and events, and the information that we (or our affiliates) provide to those interested in our companies
- For other purposes that we notify you of, or will be clear from the context, at the point information about you is first collected

The legal basis for our use of information about you is one of the following (which we explain in more detail in the “find out more” section):

- compliance with a legal obligation to which we are subject;
- the performance of a contract to which you are a party;
- a legitimate business interest that is not overridden by interests you have to protect the information;
- where none of the above applies, or where law requires it, your consent (which we will ask for before we process the information).

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The purposes for which we use information about you, with corresponding methods of collection and legal basis for use, are:

Purpose	Method of collection and legal basis for processing
Comply with regulatory obligations • verify your age and location	This information is generally provided to us by you directly. We use it because it is necessary for us to comply with legal obligations, in certain areas of our business, to deal only with adults and/or residents of particular jurisdiction, or, in countries where there is no such legal obligation, because we have a legitimate business interest to deal only with adults and/or residents of particular jurisdiction, that is not overridden by your interests, rights and freedoms to protect information about you.
Deliver, and customize your experience of, Aspeya touchpoints, press releases and mail alerts • enabling you to use Aspeya touchpoints (for example, allowing you to remain logged in to sections of a touchpoint that are reserved for authorized users only, administering your language preference)	This information is typically a combination of information that you provide to us by you directly (for example, your name and contact and social media details), and information that we collect automatically (for example, using technology (such as cookies and web beacons/pixels) to monitor your use of Aspeya touchpoints and e-mails from us), and using similar technology to monitor your use of third party

• delivering Aspeya press releases and mail alerts and corresponding with you • customizing your experience of Aspeya touchpoints (for example, to personalize your visit, such as with greetings or suggestions that might interest you) • understand whether you are still engaged with our communications and updates and whether you wish to continue to receive them • administering your accounts and troubleshooting • fraud prevention (for example in the context of our events and surveys, to ensure that they are not attended/taken more than once by the same person, or in the context of e-commerce to protect cardholder information)	touchpoints, and “digital fingerprinting” as described above; and (where permitted by law) information that we acquire from third parties (such as public social media posts). We use it on the grounds that we have a legitimate business interest to operate Aspeya touchpoints, to customize your experiences, to understand whether you wish to continue to receive our communications and updates, and prevent fraud, in these ways that is not.
Administer our contract for user-generated content with you (where applicable) • where you submit content to a digital Aspeya touchpoint, we use information about you and the content you submit to fulfil, and in accordance with, our user generated content terms	This information is generally provided to us by you directly. We use it because it is necessary for us to fulfil our contract with you and because we have a legitimate business interest to administer our relationship, market our products (including by using any content you submit to a digital Aspeya touchpoint), and to operate Aspeya touchpoints that is not overridden by your interests, rights and freedoms to protect information about you.
Business administration • general organizational management and business record keeping • administering and running events • correspondence in relation to our relationship with you, including to deal with your inquiries and requests • IT systems development, implementation, operation and maintenance • maintaining the security of systems and devices • the operation of contact databases	We will generally receive the information from you directly. We use it because we have a legitimate business interest to run our business, manage our relationship with you and maintain the security and integrity of our IT systems that is not overridden by your interests, rights and freedoms to restrict use of information about you.

Security and systems monitoring • authentication and access controls and logs, where applicable	This information is collected automatically through various means such as automated systems and device monitoring. We use it because we have a legitimate business interest in ensuring the confidentiality, integrity and security of our digital infrastructure that is not overridden by your interests, rights and freedoms to protect information about you.
Business analytics and improvements • for business analytics, statistical or scientific purposes (including for improving Aspeya products, services, outlets that sell Aspeya products, events, digital Aspeya touchpoints and the information that we (or our affiliates) provide to our customers)	This will typically be a combination of information that you provide to us (such as information from your communications with Aspeya touchpoints; or demographic information, e.g. your age, gender and the city where you live); information that we collect automatically (which may include information received from cookies, pixels and similar technologies); and (where permitted by law) information that we acquire from third parties. Where we have more than one type of information from these categories, we will combine them to improve our analysis. We use it on the grounds that either: • we have your consent to do this; or • we have a legitimate business interest to analyze and to improve our business performance, our products, Aspeya touchpoints, outlets and events, and to invite others to get involved in promoting Aspeya products, that is not overridden by interests, rights and freedoms to protect information about you.

Where we do not base our use of information about you on one of the above legal bases, or where law requires it, we will ask for your consent before we process the information (these cases will be clear from the context).

In some instances, we may use information about you in ways that are not described above. Where this is the case, we will provide a supplemental privacy notice that explains such use. You should read any supplemental notice in conjunction with this notice.

Who do we share your information with, and for what purposes?

We may share information about you with:

- companies in the Aspeya group of companies; its owner, Philip Morris Inc. (PMI) and its affiliates;
- third parties who provide Aspeya affiliates or you with products or services;
- other third parties, where required or permitted by law.

We share information about you with others only in accordance with applicable laws. Thus, where law requires your consent, we will first ask for it.

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Sharing data with Aspeya and PMI affiliates

- We may share your personal data with the PMI group entities which are responsible for coordinating personal data processing for our affiliates. Acting as a data controller, these entities process your information for all the purposes described in this notice.
- Information about you may be shared with the Aspeya affiliate that is responsible for the country in which you live (if it wasn't the Aspeya affiliate that first collected the information) for all the purposes described in this notice.
- Information about you may be shared with any other Aspeya affiliate that you contact (for example, if you travel and you want to know about our affiliate's activities in another country) in order to enhance our service to you.

Sharing data with Third Parties

- To the extent permitted by applicable law, we may share information about you with third parties who provide our affiliates or you with products or services (such as advisers, payment service providers, delivery providers, information services providers and age verification providers).
- We may share information about you with other third parties, where required or permitted by law, for example: regulatory authorities; government departments; in response to a request from law enforcement authorities or other government officials; when we consider disclosure to be necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; and in the context of organisational restructuring.

Where might information about you be sent?

As with any multinational organisation, Aspeya affiliates transfer information globally. Accordingly, information about you may be transferred globally (for example, if you are in the European Economic Area ("**EEA**"), your information may be transferred outside the EEA; if you are in Australia, your information may be transferred outside Australia).

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When using information as described in this notice, information about you may be transferred either within or outside the country or territory where it was collected, including to a country or territory that may not have equivalent data protection standards.

For example, Aspeya affiliates within the EEA may transfer personal information to Aspeya affiliates outside the EEA. In all such cases, the transfer will be:

- On the basis of law (e.g., a European Commission adequacy decision), subject to appropriate safeguards (e.g. the EU Standard Contractual Clauses or binding corporate rules); or
- with your consent or
- as necessary to discharge obligations under a contract between you and us (or the implementation of pre-contractual measures taken at your request) or for the conclusion or performance of a contract concluded in your interest between us and a third party, such as in relation to travel arrangements.

In all cases, appropriate security measures for the protection of personal information will be applied in those countries or territories, in accordance with applicable data protection laws.

Our service providers are located in many countries throughout the world, including in particular the EEA, Switzerland, the USA, Canada, India, the Philippines, Indonesia, and Australia.

How do we protect information about you?

We implement appropriate technical and organisational measures to protect personal information that we hold from unauthorised disclosure, use, alteration or destruction. Where appropriate, we use encryption and other technologies that can assist in securing the information you provide. We also require our service providers to comply with strict data privacy and security requirements.

How long will information about you be kept?

We will retain information about you for the period necessary to fulfil the purposes for which the information was collected. After that, we will delete it. The period will vary depending on the purposes for which the information was collected. Note that in some circumstances, you have the right to request us to delete the information. Also, we are sometimes legally obliged to retain the information, for example, for tax and accounting purposes.

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Typically, we retain data based on the criteria described in the table below:

Type	Explanation/typical retention criteria
Database record	If you have signed up to receive e-mail alerts (and similar) or to use a Aspeya digital touchpoint, most of the information in your profile is kept for the duration of the period you continue to receive the alerts, use the digital touchpoint, or respond to our communications. However, some elements of your profile, such as your history of use of the Aspeya digital touchpoint, naturally go out of date after a period of time, so we delete them automatically after defined periods as appropriate for the purpose for which we collected them.

System audit logs	System audit logs are retained typically for a period of only a few months.
Business analytics	Business analytics data is typically collected automatically when you use Aspeya touchpoints and anonymized/aggregated shortly afterwards. Most of the business analytics data is kept for the duration of our relationship with you as described in the first line of this table above. However, some elements of it, such as some information about whether you opened communications from us (if you choose to share it with us), naturally go out of date after a period of time, so we delete them automatically after defined periods (such as typically after 2 years for e-mail opening data) as appropriate for the purpose for which we collected them.

What rights and options do you have?

You may have some or all of the following rights in respect of information about you that we hold:

- request us to give you access to it;
- request us to rectify it, update it, or erase it;
- request us to restrict our using it, in certain circumstances;
- object to our using it, in certain circumstances;
- withdraw your consent to our using it;
- data portability, in certain circumstances;
- opt out from our using it for direct marketing; and
- lodge a complaint with the supervisory authority in your country (if there is one).

We offer you easy ways to exercise these rights, such as “unsubscribe” links, or giving you a contact address, in messages you receive.

Some mobile applications we offer might also send you push messages, for instance about new products or services. You can disable these messages through the settings in your phone or the application.

MORE DETAILS

The rights you have depend on the laws of your country. If you are in the European Economic Area, you will have the rights set out in the table below. If you are elsewhere, you can contact us (see the paragraph “who should you contact with questions?” at the end of this notice) to find out more.

Right in respect of the information about you that we hold	Further detail (note: certain legal limits to all these rights apply)
to request us to give you access to it	This is confirmation of: • whether or not we process information about you; • your name and contact details; • the purpose of the processing; • the categories of information concerned; • the categories of persons with whom we share the information and, where any person is outside the EEA and does not benefit from a European Commission adequacy decision, the appropriate safeguards for protecting the information; • (if we have it) the source of the information, if we did not collect it from you; • (to the extent we do any, which will have been brought to your attention) the existence of automated decision-making, including profiling, that produces legal effects concerning you, or significantly affects you in a similar way, and information about the logic involved, as well as the significance and the envisaged consequences of such processing for you; and • the criteria for determining the period for which we will store the information. On your request we will provide you with a copy of the information about you that we use (provided this does not affect the rights and freedoms of others).
to request us to rectify or update it	This applies if the information we hold is inaccurate or incomplete.
to request us to erase it	This applies if: • the information we hold is no longer necessary in relation to the purposes for which we use it; • we use the information on the basis of your consent and you withdraw your consent (in this case, we will remember not to contact you again, unless you tell us you want us to delete all information about you, in which case we will respect your wishes); • we use the information on the basis of legitimate interest and we find that, following your objection, we do not have an overriding interest in continuing to use it; • the information was unlawfully obtained or used; or • to comply with a legal obligation.

to request us to restrict our processing of it	This right applies, temporarily while we look into your case, if you: • contest the accuracy of the information we use; or • have objected to our using the information on the basis of legitimate interest (if you make use of your right in these cases, we will tell you before we use the information again). This right applies also if: • our use is unlawful and you oppose the erasure of the data; or • we no longer need the data, but you require it to establish a legal case.
to object to our processing it	You have two rights here: (i) if we process information about you for direct marketing: you can “opt out” (without the need to justify it) and we will comply with your request; and (ii) if we process information about you on the basis of legitimate interest for purposes other than direct marketing, you can object to our using it for those purposes, giving an explanation of your particular situation, and we will consider your objection.
to withdraw your consent to our using it	This applies if the legal basis on which we use the information about you is consent. These cases will be clear from the context.
to data portability	If: (i) you have provided data to us; and (ii) we use that data, by automated means, and on the basis either of your consent, or on the basis of discharging our contractual obligations to you, then you have the right to receive the data back from us in a commonly used format, and the right to require us to transmit the data to someone else if it is technically feasible for us to do so.
to lodge a complaint with the supervisory authority in your country	Each European Economic Area country must provide for one or more public authorities for this purpose. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm For other countries please consult the website of your country's authority.

Country-specific additional points

According to which country you are in, you may have some additional rights.

If you are in France, find out more...

If you are in France, you have the right to give us instructions regarding information we hold about you in the event of your death (specifically, whether we should store or delete it, and whether others should have the right to see it). You may:

- issue general instructions to a digital service provider registered with the French data protection supervisory authority (called “CNIL”) (these instructions apply to all use of information about you); or
- give us specific instructions that apply only to our use of information about you.

Your instructions may require us to transfer information about you to a third party (but where the information contains information about others, our obligation to respect also their privacy rights might mean that we can’t follow your instructions to the letter). You may appoint a third party to be responsible for ensuring your instructions are followed. If you do not appoint a third party in that way, your successors will (unless you specify otherwise in your instructions) be entitled to exercise your rights over information about you after your death:

- in order to administer your estate (in which case your successors will be able to access information about you to identify and obtain information that could be useful to administer your estate, including any digital goods or data that could be considered a family memory that is transferable to your successors); and
- to ensure that parties using information about you take into account your death (such as closing your account, and restricting the use of, or updating, information about you).

You may amend or revoke your instructions at any time. For further information on the processing of information about you in the event of your death, see Article 40-1 of the law 78-17 dated 6 January 1978. When you die, by default, you will stop using your account and we will delete information about you in accordance with our retention policies (see the paragraph “How long will information about you be kept?” for details).

If you are in Australia, find out more...

If you are in Australia, the following additional information applies to you:

- if you do not provide your personal information to us, we may not be able to (as applicable) provide you with the information services that you request; and
- PMI affiliate Privacy Policy in the jurisdiction (available at <https://www.pmiprivacy.com/en-au/homepage>) explains: (i) how you may access and correct the personal information that we hold about you; (ii) how you can lodge a complaint regarding our handling of your personal information; and (iii) how we will handle any complaint.

If you are in the Philippines, find out more...

If you are in the Philippines, you may have rights in addition to those set out in this notice in accordance with the Philippine Data Privacy Act and its implementing rules and regulations, including the National Privacy Commission's Privacy Policy Office Advisory Opinion No. 2018-031.

If you are in Taiwan, find out more...

If you are in Taiwan, the following additional information applies to you:

If you do not provide your personal information to us, we may not be able to (as applicable) provide you with the information, products or services that you request.

If you are in Switzerland, find out more...

If you are in Switzerland, information about you may be transferred outside of Switzerland, including to a country or territory that may not have equivalent data protection standards. In such cases, the transfer will be subject to appropriate safeguards such as the Standard Contractual Clauses in accordance with the new Data Protection Act and guidance from the Federal Data Protection and Information Commissioner.

If you are in the United States, find out more...

If you are in the US, visit the "[What rights and options do you have?](#)" section of our US Consumer Privacy Notice to learn more about the rights you have when interacting with our corporate website.

If you are in the United Kingdom, find out more...

If you are in the United Kingdom, you may have rights in addition to those set out in this notice under UK data protection law. These include the right to obtain further information about how your personal data is used, accessed, or shared, and the safeguards that apply. You also have the right to raise concerns or make a complaint about how we handle your personal data using the contact details set out in our privacy notice. If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO).

Who should you contact with questions?

If you have any questions, or wish to exercise any of your rights, you can contact us at:

- info@aspeya.com for Aspeya affiliates;
- info@verdeyalife.com for Verdeya affiliates;
- privacy@fertin.com for Fertin affiliates.

You can also find contact details for the relevant Aspeya affiliate in the list of affiliates linked at the top of this privacy notice. Contact details will also be given in any communications that we send you.

If your country has a data protection authority, you have a right to contact it with any questions or concerns. If the relevant Aspeya affiliate cannot resolve your questions or concerns, you also have the right to seek judicial remedy before a national court.

Changes to this notice

We may update this notice (and any supplemental privacy notice), from time to time. Where the law requires it, we will notify you of the changes; further, where the law requires it, we will also obtain your consent to the changes.

Last modified: 17 June 2026

