

PRIVACY POLICY

Last Modified: 24.02.2025

We at ModestoGroup OÜ: registration number 16203107, address: the Republic of Estonia, Harju maakond, Tallinn, Lasnamäe linnaosa, K. Kärberi tn 18-2, 13919, and our affiliates, are committed to protecting your privacy. This Privacy Policy applies to the information and data collected by ModestoGroup OÜ as a controller, including the information collected on our Website (www.m-flowers.com) or through other channels as described below. It also describes your choices regarding use, access and correction of your personal information. If you do not agree with the data practices described in this Privacy Policy, you should not use the Website.

This Privacy Policy does not apply to the data ModestoGroup OÜ processes on behalf of our customers (Customer Data) in our capacity as a processor. Your use of the website m-flowers.com It is governed by this Privacy Policy.

We periodically update this Privacy Policy. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by sending you an email notification.

While we will notify you of any material changes to this Privacy Policy prior to the changes becoming effective, we encourage you to review this Privacy Policy periodically. We will also keep prior versions of this Privacy Policy in an archive for your review.

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please write to us by email at info@m-flowers.com or by mail to ModestoGroup OÜ, 16203107, the Republic of Estonia, Harju maakond, Tallinn, Lasnamäe linnaosa, K. Kärberi tn 18-2, 13919, Attn: Privacy.

1. Information We Collect

Our use of marketing information

We use our own marketing service to build webpages that people can visit to learn more about ModestoGroup OÜ. Information that we collect and manage using the marketing service for our own marketing belongs to us and is used, disclosed and protected according to this Privacy Policy.

When You Visit our Website

You are free to explore the Website without providing any Personal Information about yourself. When you visit the Website or register in your personal account, we request that you provide Personal Information about yourself, and we collect Navigational Information.

"Personal Information"

This refers to any information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, e-mail address, company name, address, phone number, and other information about yourself or your business. Personal Information can also include information about any transactions, both free and paid, that you enter into on the Website, and information about you that is available on the internet, such as from Facebook, LinkedIn, Twitter and Google, or publicly available information that we acquire from service providers.

Personal Information includes Navigational Information or Payment Information where such information can directly or indirectly identify an individual. Navigational information refers to information about your computer and your visits to the Website such as your IP address, geographical location, browser type, referral source, length of visit and pages viewed. Please see the "Use of Navigation Information" section below. Payment information includes information we collect and process when you transmit information about the company to enter into a contract with ModestoGroup OÜ, including credit card numbers and billing information, using third party PCI-compliant service providers. Except for this, we do not collect Sensitive Information from you.

"Sensitive Information"

This refers to credit or debit card numbers, personal financial account information, Social Security numbers, driver's license numbers or similar personal identifiers, racial or ethnic origin, physical or mental health condition or information, or other employment, financial or health information.

Log Files

When you view content provided by us, we automatically collect information about your computer hardware and software. This information can include your IP address, browser type, domain names, internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, clickstream data, access times and referring website addresses. This information is used by M-flowers to provide general statistics regarding use of the Website. For these purposes, we do link this automatically-collected data to Personal Information such as name, email address, address, and phone number.

Information we collect from third parties

From time to time, we may receive Personal Information about you from third party sources including partners with which we offer co-branded services or engage in joint marketing activities, and publicly available sources such as social media website.

Information About Children

The Website are not intended for or targeted at children under 16, and we do not knowingly or intentionally collect information about children under 16. If you believe that we have collected information about a child under 16, please contact us at info@m-flowers.com, so that we may delete the information.

2. How We Use Information We Collect

Compliance with Our Privacy Policy

We use the information we collect only in compliance with this Privacy Policy. Customers who are granted access to their personal account, in accordance with our agreements with them, are required to comply with this Privacy Policy.

We Never Sell Personal Information

We will never sell your Personal Information to any third party.

Use of Personal Information

In addition to the uses identified elsewhere in this Privacy Policy, we may use your Personal Information to:

- improve your browsing experience by personalizing the Website;
- send information or ModestoGroup OÜ content to you which we think may be of interest to you by post, email, or other means and send you marketing communications relating to our business;
- promote use of our services to you and share promotional and information content with you in accordance with your communication preferences;
- provide other companies with statistical information about our users -- but this information will not be used to identify any individual user;
- send information to you regarding changes to our Customer Terms of Service, Privacy Policy (including the Cookie Policy), or other legal agreements meet legal requirements.

We may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, we do not transfer your Personal Information to the third party.

Legal basis for processing Personal Information (EEA visitors only)

If you are a visitor located in the European Economic Area ("EEA"), ModestoGroup OÜ is the data controller of your personal information. ModestoGroup OÜ is Data Protection Officer can be contacted at info@m-flowers.com.

If you are a visitor located in USA, the collection and handling of your personal data is made under the following US laws: Privacy Act of 1974 и Privacy Protection Act of 198 and other applicable US laws and case law.

If you are a visitor located in other countries except for EU and USA, the collection and handling of your personal data is made under the laws of the Republic of Estonia and other applicable laws.

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

Use of Navigational Information

We use Navigational Information to operate and improve the Website. We may also use Navigational Information alone or in combination with Personal Information to provide you with personalized information about ModestoGroup OÜ.

Customer Consent and Comments

If you register on the Website you provide the consent to provide the Personal Information to ModestoGroup OÜ and our affiliates to collect and to handle your Personal Information pursuant to this Privacy Policy. At any time, you are entitled to withdraw the consent to collect and to handle your Personal Information on the Website by the relevant application to at every possible way (e-mail, mailing, etc.) to ModestoGroup OÜ. In this case you shall be obliged to stop using the Website.

Use of Payment Information

If you give us Payment information, we use it solely to check your financial qualifications and collect payment from you. We use a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use information you provide except for the sole purpose of credit card processing on our behalf.

Security of your Personal Information

We use a variety of security technologies and procedures to help protect your Personal Information from unauthorized access, use or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Information is protected using appropriate physical, technical and organizational measures.

External Website

Our Website provide links to other website. We do not control, and are not responsible for, the content or practices of these other website. Our provision of such links does not constitute our endorsement of these other

website, their content, their owners, or their practices. This Privacy Policy does not apply to these other websites, which are subject to any privacy and other policies they may have.

Public Forums

We offer publicly accessible message boards, blogs, and community forums. Please keep in mind that if you directly disclose any information through our public message boards, blogs, or forums, this information may be collected and used by others. We will correct or delete any information you have posted on the Website if you so request, as described in "Opting Out and Unsubscribing" below.

Retention of Personal Information

How long we keep information we collect about you depends on the type of information. As described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

We retain Personal Information that you provide to us where we have an ongoing legitimate business need to do so (for example, as needed to comply with our legal obligations, resolve disputes and enforce our agreements).

When we have no ongoing legitimate business need to process your Personal Information, we securely delete the information or anonymise it or, if this is not possible, securely store your Personal Information and isolate it from any further processing until deletion is possible. We will delete this information at an earlier date if you so request, as described in the "How to Access & Control Your Personal Data" below.

If you have elected to receive marketing communications from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products, or services, such as when you last opened an email from us or ceased using your M-flowers account. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created

3. How we Share Information we Collect

Service Providers

We employ other companies and people to provide services to visitors to our Websites and our customers and may need to share your information with them to provide information, products or services to you. Examples may include removing repetitive information from prospect lists, analyzing data or performing statistical analysis, providing marketing assistance, processing credit card payments, supplementing the information you provide us in order to provide you with better service, and providing customer service or support. In all cases where we share your information with such agents, we explicitly require the agent to acknowledge and adhere to our privacy and customer data handling policies.

ModestoGroup OÜ Partners

In addition, we may share data with trusted partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide customer support. Such third parties are prohibited from using your Personal Information except for these purposes, and they are required to maintain the confidentiality of your information. We partner with trusted third parties to provide you with co-marketing content that we think may be relevant to you. When you engage with these co-marketing partners, we will tell you who we are sharing data with, and provide a link to the co-marketing partner's privacy policy so you can learn more about how to opt-out of the partner's communications. These co-marketing partners are required to adhere to our privacy and data protection policies. For more information on our co-marketing program.

Corporate Events

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by M-flowers on the Website. In this event, you will be notified via email and/or a prominent notice on our website, of any change in ownership, uses of your Personal Information, and choices you may have regarding your Personal Information.

Compelled Disclosure

We reserve the right to use or disclose your Personal Information if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or comply with a law, court order, or legal process.

4. International Transfer of Information

International Transfers within ModestoGroup OÜ is Entities

To facilitate our global operations, we transfer information to either ModestoGroup OÜ and allow access to that information from countries in which the ModestoGroup OÜ affiliated entities have operations for the purposes described in this policy.

This Privacy Policy shall apply even if we transfer Personal Information to other countries. We have taken appropriate safeguards to require that your Personal Information will remain protected. When we share information about you within and among M-flowers's affiliated entities, we make use of standard contractual data protection clauses, which have been approved by the European Commission, and we rely on the EU-U.S. and Swiss-U.S. Privacy Shield Framework to safeguard the transfer of information we collect from the European Economic Area and Switzerland. Please see our Privacy Shield notice below for more information.

International transfers to third parties

Some of the third parties described in this privacy policy, which provide services to us under contract, are based in other countries that may not have equivalent privacy and data protection laws to the country in which you reside. When we share information of customers in the European Economic Area or Switzerland, we make use of the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, European Commission-approved standard contractual data protection clauses, binding corporate rules for transfers to data processors, or other appropriate legal mechanisms to safeguard the transfer. Please see our Privacy Shield Notice below.

5. Cookies and Similar Technologies

Cookies

ModestoGroup OÜ and its partners use cookies or similar technologies (such as web beacons) to analyze trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. One of the main purpose of cookies is to provide security for all users and ModestoGroup OÜ by using Website.

By continuing to use the Service, the User agrees to the installation and further action on the computer or mobile device by the User of cookies. You are entitled to allow the use of cookies or refuse their use from them using a pop-up dialog box. If you do not accept these terms of use of cookies on the Website, you are obliged to immediately leave the Website or disable cookies in his browser in the appropriate settings.

To find out more about how we use cookies on our Website and how to manage your cookie preferences please see our Cookie Policy.

Navigational Information Collected by Our Customers

Our customers can use the tools we provide, as well as tools provided by third parties, to collect Navigational Information when you visit their webpages. ModestoGroup OÜ does not control our customers' use of these tools, nor do we control the information they collect or how they use it.

Flash Cookies and Other Third Party Tracking Technologies

The Adobe Flash Player (and similar applications) use technology to remember settings, preferences and usage similar to browser cookies but these are managed through a different interface than the one provided by your Web browser. This technology creates locally stored objects that are often referred to as "Flash cookies." ModestoGroup OÜ does not use Flash cookies. However, our customers of our software platform may create pages on the ModestoGroup OÜ platform that employ Adobe Flash cookies. For more information on "Flash cookies" and how you can manage them please visit our Cookie Policy.

Third Party Tracking Technologies

The use of cookies and web beacons by any tracking utility company is not covered by our Privacy Policy or Cookie Policy.

6. How to Access & Control Your Personal Data

Reviewing, Correcting and Removing Your Personal Information

- You have the following data protection rights:
- You can request access, correction, updates or deletion of your personal information.
- You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.

If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal information. Contact details for data protection authorities in the EEA, Switzerland and certain non-European countries (including the US and Canada) are available here.)

To exercise any of these rights, please contact us at info@m-flowers.com or by mail to ModestoGroup OÜ, Registry code 16203107, the Republic of Estonia, Harju maakond, Tallinn, Lasnamäe linnaosa, K. Kärberi tn 18-2, 13919, Attention: Privacy. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

Anti-Spam Policy

Our Acceptable Use Policy applies to us and to our customers send unsolicited commercial email in violation of applicable laws, and requires the inclusion in every email sent an "opt-out" mechanism and other required information. We require all of our customers to agree to adhere to the Acceptable Use Policy at all times, and any violations of the Acceptable Use Policy by a customer can result in immediate suspension or termination of access to your personal account.

To Unsubscribe From Our Communications

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, updating your communication preferences, or by sending us email us at info@m-

flowers.com or postal mail to ModestoGroup OÜ, Registry code 16203107, the Republic of Estonia, Harju maakond, Tallinn, Lasnamäe linnaosa, K. Kärberi tn 18-2, 13919, Attention: Privacy. Customers cannot opt out of receiving transactional emails related to their account.

To Unsubscribe from Our Customers' Communications

Our customers are solely responsible for their own marketing emails and other communications; we cannot unsubscribe you from their communications. You can unsubscribe from our customers' marketing communications by clicking on the "unsubscribe" link located on the bottom of their emails, or by contacting them directly.

Contact

info@m-flowers.com

ModestoGroup OÜ

Registry code 16203107

the Republic of Estonia, Harju maakond, Tallinn, Lasnamäe linnaosa, K. Kärberi tn 18-2, 13919