

PRIVACY POLICY

Ular Farming Enterprise

Website: <https://www.wellia.com.ua> | Date of approval: [27.07.2026]

This Policy is drafted in a universal format: it describes both the current functionality of the Website and possible future features (registration, ordering/payment, newsletters, etc.). A provision relating to a specific feature applies only where that feature is actually available on the Website at the time of your visit. If a feature has not been implemented, the corresponding data processing simply does not take place, regardless of the fact that it is described in this Policy on a precautionary basis.

1. General provisions

Ular Farming Enterprise ("we", "us", "our") is a Ukrainian legal entity that carries out its activities through the website <https://www.wellia.com.ua> (the "Website"). We respect your privacy. This Privacy Policy (the "Policy") explains what personal data we may process in connection with the Website, depending on which of its features you use, for what purposes, on what legal grounds and how we protect that data.

Applicable law. We process personal data in accordance with the Law of Ukraine "On Personal Data Protection". Where the EU General Data Protection Regulation (GDPR) or the UK GDPR applies to a particular individual — for example, where that person is located in the EEA or the United Kingdom — we additionally follow the principles set out in Annex A.

Scope. This Policy applies to visitors to the Website and to persons who interact with us through any of the features described in Section 3, irrespective of whether all of those features are currently active on the Website.

2. Key definitions

- **Personal data owner (Controller):** the person who determines the purposes and means of data processing (in this relationship — us).
- **Personal data administrator (Processor):** the person who processes data on behalf of and at the instruction of the controller (for example, a hosting provider or a payment operator).
- **Personal data:** any information relating to an identified or identifiable natural person.
- **Processing:** any operation performed on personal data (collection, storage, use, transfer, destruction, etc.).

Data controller: Ular Farming Enterprise, USREOU code 32461669, 157 Naddnistrianska Street, Kyivets village, Stryi district, Lviv region, 81646, Ukraine. Tel.: +38 (032) 242 11 17. Email: office@ular.com.ua.

3. Data we may process — depending on the interaction scenario

Set out below is an exhaustive list of the scenarios in which we may process your personal data. Each scenario applies only where the relevant feature is actually available on the Website and is used by you.

3.1. Browsing the Website (always applicable)

Whenever you browse the Website, the following may be processed automatically, to the minimum technical extent necessary for the Website to operate: IP address, device and browser type, interface language, and

the date and time of access to pages. Further details on technical cookies are set out in our separate Cookie Policy.

3.2. If you contact us through the contact form or by email

We receive the data you provide in your enquiry: as a rule, your name, email address and/or telephone number, company name (where applicable) and the content of your message. This data is used solely to process and respond to your enquiry.

3.3. If account registration is available on the Website

Where the Website provides for the creation of a personal account, we process the data required for registration and authentication: name, email address, password (in protected form), and any profile data you voluntarily provide. Such data is used to give you access to account features and is retained for as long as the account remains active.

3.4. If ordering or payment for goods/services is available on the Website

Where the Website provides for online ordering or payment, we process the data required to perform the contract: contact and payment details, delivery address and order history. Payments are processed through a certified payment provider — we do not store full bank card details.

3.5. If you subscribe to our newsletter

Where the Website offers a subscription to news or marketing communications, we process your email address (and your name, if provided) on the basis of your separate consent obtained at the time of subscription. You may unsubscribe at any time using the link in the email or by contacting office@ular.com.ua.

3.6. What we never do under any circumstances

Regardless of which of the scenarios described above are active, we:

- do not sell personal data to third parties;
- do not carry out profiling or automated decision-making producing legal effects without separate notice and, where necessary, your consent;
- do not process the data of persons under 18 years of age and do not process special categories of data (health, beliefs, etc.) unless this has been expressly agreed with you separately;
- do not activate any of the scenarios in Sections 3.3–3.5 until the relevant functionality has actually been implemented on the Website, and do not request data on a precautionary basis.

4. Legal bases and purposes of processing

We process personal data only on the following bases, depending on the scenario:

- **Consent** — for enquiries submitted through the contact form (by default), newsletter subscriptions (Section 3.5), and in any other cases where the law requires separate consent; consent may be withdrawn at any time via office@ular.com.ua;
- **Contract** — for account registration (Section 3.3) and order placement (Section 3.4), where processing is necessary to enter into or perform a contract;

- **Legitimate interest** — in particular, to ensure the security and proper operation of the Website, to handle enquiries and to prevent fraud;
- **Legal obligation** — where processing is required by the applicable legislation of Ukraine (for example, accounting records in the case of paid orders).

Data recipients may include the technical service providers engaged for the relevant scenario (for example, the hosting platform — at all times; a payment provider — only where payment is available; a mailing service — only where a subscription is available). Such providers act as data processors and are obliged to maintain confidentiality in accordance with their contract with us.

5. Data transfers and international transfers

We engage technical service providers only to the extent necessary for the Website features that are active at the time of your visit (hosting, communications and, where available, payment and mailing services). Such providers process data at our instruction and are obliged to maintain confidentiality.

Transfers of data outside Ukraine are possible only where an adequate level of protection is ensured or appropriate contractual safeguards (for example, standard contractual clauses) are applied.

We may disclose data to competent public authorities (courts, tax authorities, etc.) where this is expressly required by law.

6. Storage and security

6.1. Retention periods

The retention period depends on the scenario: data from contact form enquiries — no longer than 3 years from the last contact; account data — for the period during which the account is active and for up to a further 3 years after deletion (for record-keeping and the protection of rights); order data — in accordance with tax and accounting legislation; newsletter subscription data — until you unsubscribe. In all cases, data is retained no longer than the applicable law requires.

6.2. Security measures

- restricted staff access to the data received;
- use of reliable technical service providers;
- technical protection measures (HTTPS connection encryption, access control and, where payments are available, the provider's compliance with payment security standards).

6.3. Security incidents

If a personal data security breach is detected, we take reasonable steps to minimise the risks and, where required by law, notify the competent authorities and the individuals affected.

6.4. Minors

The Website is not intended for persons under 18 years of age, and we do not knowingly collect their data under any of the scenarios described in Section 3. If you believe that a child has provided us with data, please write to office@ular.com.ua and we will delete such data.

7. Your rights

Under the Law of Ukraine "On Personal Data Protection", you have the right to:

- know the sources, purposes of processing and place of storage of your data;
- obtain access to your data;
- request the correction, updating, blocking or deletion of your data;
- object to processing where it is carried out without a proper legal basis;
- withdraw your consent at any time, including unsubscribing from the newsletter;
- know who receives your data;
- lodge a complaint with the Ukrainian Parliament Commissioner for Human Rights or with a court.

How to exercise your rights: send a request to office@ular.com.ua stating your full name, contact details and a clear description of your request, or by post to: 157 Naddnistrianska Street, Kyivets village, Stryi district, Lviv region, 81646, Ukraine.

8. Cookies

A detailed list of the cookies actually used on the Website, and the arrangements for managing them, is set out in our separate Cookie Policy, which forms an integral part of this Policy.

9. Third parties and links

The Website may contain links to our social media pages or to third-party websites. We do not control and are not responsible for the data processing practices of such third-party resources — we recommend that you review their own privacy policies.

10. Policy updates and contact details

We may update this Policy in connection with changes in legislation, in our practices or in the functionality of the Website. The current version is always published at <https://www.wellia.com.ua>. We will provide separate notice of material changes affecting your rights, so far as reasonably practicable.

Contact details:

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Annex A. GDPR notice (for visitors from the EEA / United Kingdom)

If the GDPR or the UK GDPR applies to you, we additionally observe the following principles: data is processed only where there is a legal basis provided for in Article 6 of the GDPR (consent, contract, legitimate interest, legal obligation); you have the right of access, rectification, erasure (the "right to be forgotten"), restriction of processing, data portability and the right to object to processing; and you have the right to lodge a complaint with the supervisory authority of your country of residence. These rights are exercised in the same way as described in Section 7 — via office@ular.com.ua.

The practical scope of application of the GDPR is determined by which of the scenarios in Section 3 are active for you at the time of your interaction with the Website.