

GDPR Statement – Axo Longevity, Inc.

Version: 2.0

Effective Date: November 1, 2025

This Privacy Statement explains how **Axo Longevity, Inc.** ("Axo Longevity," "we," "us," or "our") collects and processes personal data with respect to data subjects covered by the EU General Data Protection Regulation (GDPR) and the UK GDPR. It applies to data subjects whose personal information we process through websites, apps, forms, services or integrations you authorise. Depending on your geographic location, some sections may not apply.

Company/Contact Information:

- **Company Address:** 373 Wythe Avenue, Suite 11B, Brooklyn, NY 11249, USA
- **Email:** privacy@axolongevity.com
- **EU Representative:** Osano International Compliance Services Limited, ATTN: 6GEV, 25 North Wall Quay, Dublin 1, D01 H104, Ireland
- **UK Representative:** Osano UK Compliance LTD, ATTN: 6GEV, 42–46 Fountain Street, Belfast, Antrim, BT1 5EF, UK.

About Us: Axo Longevity provides wellness, performance guidance, and educational insights. We are not a healthcare provider and do not diagnose, treat, cure, or prevent disease. Our services are not directed to children under 16 (or applicable local age). We do not knowingly collect data from minors without verifiable parental consent.

GDPR Principles

We process personal data in line with GDPR principles:

- Lawfulness, fairness, transparency
- Purpose limitation
- Data minimization
- Accuracy
- Storage limitation: We retain personal data only as long as necessary to fulfill the purposes outlined in this notice, comply with legal obligations, resolve disputes, or enforce agreements. Specific retention periods vary depending on data category and processing purpose.
- Integrity and confidentiality - We implement appropriate technical and organizational measures to protect data, including encryption in transit and at rest, access controls, and regular security assessments.
- Accountability

Sources of Data Collection

- Directly from you (registration, purchases, forms, support, uploads)
- Automatically (cookies/SDKs, logs, device/browser data)
- From third parties (wearables, labs, analytics/marketing partners, payment processors, referrals)

Categories of Personal Data

- **Identifiers & Contact Information:** Name, phone number, mailing address, email, usernames
- **Demographics:** Date of birth, gender
- **Technical Data:** IP address, location data, device/browser information, account & transaction metadata
- **Usage & Community Contributions:** Platform activity, usage data, preferences, community contributions such as forum posts, feedback
- Special Category Data: Only processed with explicit consent or as legally permitted: ethnicity, racial origin, religious beliefs, trade union membership, sexual orientation, health/biomarker data, biometric and genetic data.

How We Use Your Personal Information

Use of Personal Data: Personal data is used for providing services, contacting you, improving our platform, developing features, marketing, fraud detection/prevention, legal compliance, security monitoring, and any specific consented purposes.

Legal Basis for Processing: Processing relies on consent, contract performance, legal obligations, vital interests, public interest, or legitimate interests balanced with your rights.

Sharing of Your Personal Information

We do not sell personal information. We may share with:

- Service providers and vendors - We share limited personal data with hosting providers (e.g., AWS), analytics providers (e.g., Google Analytics), email service providers, and payment processors for operational purposes.
- Within our corporate group
- Professional advisors (legal, accounting, banking)
- Public authorities when legally required

International Data Transfer Mechanisms

Data transferred outside the EU/UK is protected by Standard Contractual Clauses (SCCs), adequacy decisions, Binding Corporate Rules (BCRs), and the EU–U.S. Data Privacy Framework as applicable.

Data Processing Agreement

All data processors are governed by a Data Processing Agreement (DPA) to ensure GDPR compliance.

Your Data Subject Rights

Rights include:

- Confirmation
- Access
- Rectification
- Erasure
- Restriction
- Portability
- Objection:
- Not to be subject to automated decisions: We do not engage in automated decision-making that produces legal or similarly significant effects. If this changes, we will provide explicit notice and the logic, significance, and consequences involved.
- Withdrawing consent.

You have the right to lodge a complaint with your local data protection authority or the Irish Data Protection Commission, our lead authority.

Contact privacy@axolongevity.com to exercise rights.

Data Protection Officer

DPO: Alonso Mujica – alonso@axolongevity.com

Subprocessors

Name of Subprocessor	Location	Categories of Data	Purpose
		Shared	

Axo Longevity

Amazon Web Services (AWS)	US/EU regions	Identifiers, logs, stored content	Hosting, storage, networking
Google Analytics / Tag Manager	Global	Online identifiers, device/browser data	Analytics, tag orchestration
Meta (Facebook/Instagram) Pixel	Global	Identifiers, event data	Advertising attribution
Twitter/X Pixel	Global	Identifiers, event data	Advertising attribution
Customer.io	US/EU	Contact details, messaging preferences	Transactional/marketing communications
Viral Loops	EU/Global	Identifiers, referral metrics	Referral program tracking
Payment Processor (e.g., Stripe)	Global	Billing metadata; payment tokens	Payment processing