

DATA HANDLING POLICY FOR EUROPEAN INDEPENDENT PARTNERS

1. What is GDPR?

- 1.1. The General Data Protection Regulation (“**GDPR**”) is a European Law which forms the cornerstone of data protection for individuals living within Europe.
- 1.2. GDPR applies in all European Economic Area territories where we sell Juice Plus+ products and it’s still relevant in the UK too (after Brexit) because the UK has adopted it into its laws (“**UK GDPR**”). There are similar laws in place in Switzerland (the “**Swiss Federal Data Protection Act**”). In this policy we refer to all relevant data protection laws in Europe as the “**Data Privacy Regulations**”.
- 1.3. The Data Privacy Regulations aim to create a level playing field in Europe giving more control to individuals around what companies and service providers do with their personal data.
- 1.4. The Data Privacy Regulations apply to all entities (corporates like Juice Plus+ and you as self-employed Independent Partners (“**IP**” or “**you**”). The size of the business doesn’t matter, and the Data Privacy Regulations will apply when we each process information about people that live in the European markets where we and you operate our businesses.
- 1.5. The Juice Plus+ Company (the “**Company**”, “**we**”, “**us**”) is the controller of information stored in Juice Plus+ systems like your virtual office/myjuiceplus.com, and of the payment information that we collect and process of our Customers and IPs. So, we are responsible for meeting Data Privacy Regulations requirements with respect to this data.
- 1.6. You (as an IP) are also an independent controller of the personal information that you collect and process in running your own business. This is because you make independent decisions on what information you collect and how you use it. Your local data protection authority will provide free information and tools to help you, as a small business, comply with your obligations.

2. Who does the Juice Plus+ Data Handling Policy apply to?

- 2.1. The Juice Plus+ Data Handling Policy applies to all Juice Plus+ IPs. It explains how you must handle personal information (“**Personal Data**” as defined in 3.2.1) when you operate as an IP, provide, and improve the Juice Plus+ products, tools and services (“**Juice Plus+ Services**”).
- 2.2. As a condition of operating as a Juice Plus+ IP, you must comply with this Policy, the Juice Plus+ Customer and Independent Partner Privacy Policy (“**Privacy Policies**”), the Independent Partner Rules of Operation and Conduct (“**ROC**”) and the Data Privacy Regulations regarding the collection, use, storing, accessing, retaining or deleting of personal data (“**process or processing**”) of Juice Plus+ Customers or IPs.
- 2.3. You must use the Juice Plus+ Websites, Applications, Tools and Materials (“**Juice Plus+ Tools**”) for processing Personal Data when providing the Juice Plus+ Services.
- 2.4. In all other cases where you are running a non-Juice Plus+ business or service or using non-Juice Plus+ Tools you act as a data controller and are responsible for your own actions.

3. Key Principles for you to understand and follow

3.1. Transparency

- Tell people who you are and what you’re doing - direct customers and partners in your downline to the Juice Plus+ Privacy Policies on our websites.
- These Privacy Policies tell individuals about the Personal Data Juice Plus+ collects, what we do with it and the relationship we have with you.
- The Privacy Policies explain how to contact Juice Plus+ if they have issues or concerns about the processing of their Personal Data and how they can exercise their Data Subject Rights.
- If a customer or IP has a query about how Juice Plus+ processes their data or if you receive any request from a customer or IP to exercise their data subject right of access e.g., right to rectification, restriction of processing, erasure, data portability (“**Data Subject Request**”), you must promptly tell them to contact our Data Privacy Team.

Juice Plus+ reserves the right to change, suspend, or discontinue this Policy, in whole or in part, with or without notice, and to make final decisions as to its meaning and application.

3.2. What Personal Data might you process when running your Juice Plus+ business?

3.2.1. As an IP you may receive access to the following categories of customer and IP Personal Data:

- Name
- Address
- Telephone Number
- Email Address
- Profile pictures
- Gender
- Date of Birth
- Education and Employment details
- Transaction data (including bank or card details)
- Social Security, Tax, and Sales Tax ID numbers or similar
- Customer or IP Children's basic data as part of the Healthy Starts for Families programme (Name/Surname)
- Photographs and videos containing the image of a data subject.
- Testimonials and feedback regarding the Juice Plus+ Products and Services

3.2.2. In accordance with the Privacy Policies, you may be a recipient of Personal Data as an IP where: (a) you receive personal data to fulfil the Juice Plus+ contractual terms and/or taking steps, to enter into such a contract; or (b) we have explicit and valid **consent** from the customer or IP; or (c) it is necessary for Juice Plus+ legitimate interests, including our interest to operate our business in accordance with legitimate commercial practice, for example to:

- provide the products, services and support needed;
- process and manage orders and transactions;
- take-back products and to manage warranties;
- promote and advertise the products and services;
- provide personalised recommendations, relevant content, surveys, questionnaires, and other materials;
- prepare and enter into an IP Agreement;
- conduct and improve the Juice Plus+ Services and Tools;
- prevent and detect fraud;
- to communicate changes to the Juice Plus+ policies and other administrative matters;
- to meet legal obligations, such as conduct product call-back operations and to respond to requests for information by competent public bodies and judicial authorities.

4. Processing Personal Data for different purposes

4.1. You must not process, under any circumstance, any Personal Data for any purpose other than as set out in this Policy, without the written consent of the VP of Global Compliance.

4.2. You must not process any Personal Data from an individual under 16 years, unless the IP has the written consent of the parents or whoever holds parental responsibility for the child. As part of the Juice Plus+ Healthy Starts for Families programme, we enable parents to add their children's basic data to their family orders for order management and customer research purposes. Once a child turns 18, we will automatically treat them as a customer and enable them to manage their orders independently.

5. Accuracy and Retention of Customer or IP Data

5.1. If a customer or IP's Personal Data needs to be updated or corrected, you must notify the Company and we will review the Personal Data and action the change e.g., if they move to a new house or change phone numbers). Out of date personal data must be deleted.

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- 5.2. You warrant and represent that you will not create or keep copies of the Personal Data collected and/or processed by Juice Plus+ and you will not retain the Personal Data for any longer than is reasonable for the purposes it has been collected. **NOTE:** you acknowledge and agree that Payment data may only be collected/used for the processing of orders using the Juice Plus+ Tools and it must be deleted once an order is processed.
- 5.3. You must not give access to the Personal Data, in whole or part, or any identifiable data derived from the Personal Data to any third party under any circumstances and you must inform the Company of any such request.
- 5.4. You must immediately delete all the Personal Data for a customer or IP if the Company instructs you to do so.
- 5.5. You confirm that you will deal promptly and appropriately with any data related requests made by a customer or IP and you will confirm in writing to the Company that the relevant Personal Data deletion has taken place (when asked to).

6. Transfers of Personal Data

You are not allowed to share and/or transfer Personal Data to other IPs or any third party without the explicit approval from the Company or as envisaged by this policy. If the Company learns that an IP is processing Personal Data in a manner contrary to the Policy, it will take steps to prevent or stop the processing and take appropriate legal measures.

7. Keeping Personal Data Safe and Secure

- 7.1. Juice Plus+ has appropriate information security practices in place to secure the data it is processing and that security obviously covers the data you may use in operating your business through myjuiceplus.com. For example, Personal Data on our systems is protected by firewalls and other information security systems, we have monitoring and logging systems in place.
- 7.2. Juice Plus+ is responsible for handling any data breaches that occur in its systems and will determine whether there is an obligation to report such breaches to the local data protection supervisory authorities.
- 7.3. You warrant and undertake to employ reasonable and appropriate technical and personal measures to safeguard Personal Data against loss, misuse, unauthorized access, theft, modification, disclosure and destruction. Use passwords on your devices that are hard to guess and change them regularly. Do not make copies of data in your own computers or other devices.
- 7.4. The Company may provide training to IPs where relevant or necessary to promote awareness of the Company's requirements and policies surrounding protection and security of Personal Data.
- 7.5. You must notify the Company immediately about any security breach, risk or disruption which impacts Personal Data, as well as of any suspicion of data protection infringements concerning Personal Data. If there is a security breach (e.g., you destroy, lose, or change personal data or where someone else gets access to it unlawfully) you must act quickly contacting the Juice Plus+ Compliance Team within 24 hours of becoming aware of it. You can also contact our data protection team by email with any questions: **EMEA** - dsar.emea@juiceplus.com or our UK Data Protection Officer Aphaia Ltd at dpo@aphaia.co.uk. **US** - dpo.usa@juiceplus.com

8. Resolving data privacy concerns

- 8.1. The Company's Compliance Department is responsible for implementing and overseeing the administration of the Policy. All IPs are required to adhere to this Policy. Failure to do so or any misuse of personal data is a serious offence, for which action may be taken under the ROC, potentially resulting in termination of the IP's agreement.

This Data Handling Policy is effective as of 1 January 2024/14 February 2024.

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