

Juice Plus+ Privacy and Cookie Policy - INDEPENDENT PARTNER

At Juice Plus+ we have a strong respect and we appreciate your business with us. In particular data protection has the highest priority and, since we started, we always made sure to build our services with a set of strong privacy principles in mind and expect the same from our business partners.

This Privacy Policy ("Policy") explains:

- what type of personal information ("Data") we may collect when you access our Juice Plus+ Website or any Juice Plus+ mobile sites, applications, and other interactive features or services where this Policy is published, including your virtual office and online partner management system ("Sites")
- how we may use your Data
- when (under certain circumstances) we may disclose your Data
- how you can access and update the Data
- steps we have taken to secure your Data
- your obligations when you are handling Data as an Independent Partner

Please note that this Policy may change from time to time so please ensure to review it frequently.

The essentials:

We keep your data safely and securely only for as long as it is necessary

We use your data fairly and lawfully to improve your experience

You are in charge of how and when you hear from us

We do not sell any of your Data provided

In this Policy the first person ("we", "our", "us", "ours") denotes The Juice Plus+ Company or any of its subsidiaries or affiliates connected to the Juice Plus+® brand (in short, "Juice Plus+") responsible for the collection and processing of the Data and bound by this Policy.

The second person ("you", "your", "yours") denotes you as the Independent Partner (IP), or generally the individual providing Data or any other information, being the subject matter of this Policy.

1. When is Data collected and for what purpose?

At Juice Plus+ we limit the amount and type of data that we collect to what is necessary for the identified purposes and do not collect Data unless you provide it to us voluntarily.

Although the precise details of the Data collected will vary according to the specific purpose, we may typically collect the following Data from or in relation to you:

<u>Data</u>	<u>Purpose</u>
Information about your use of the Sites (" Usage Data "). It may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your Site use. The source of the	The Usage Data may be processed to operate, provide, improve, understand, customize, support, and market our products and services to you.

<p>Usage Data is an analytic tracking third party system.</p>	
<p>Information included in your personal account on the Sites ("Account Data"). It may include, but is not limited to:</p> <ul style="list-style-type: none"> • Your Name • Address • Telephone Number • Email Address • Profile pictures • Gender • Date of Birth • Education and Employment details • Your card, bank and transaction details • Social Security, Tax, and Sales Tax ID numbers or similar, based on your jurisdiction's fiscal requirements. • Children's basic data * 	<p>The Account Data may be processed to:</p> <ul style="list-style-type: none"> • Register you as an Independent Partner • Supply our products and services, • Provide information, promote and advertise our Products and Services and our special offers • Provide support, and improve, fix, and customize our Services • Monitor and address threats, abuse, or infringement activities • Manage our partner system • Manage and/or review the payment of the earnings you are entitled to receive according to the Compensation Plan • Meet our legal obligations, such as: to conduct product call-back operations; and to respond to requests for information by competent public bodies and judicial authorities. • * As part of 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. The parent and the child may at any time object to further processing of the child's data or request its erasure. This does not apply to the data pertaining to any orders made by the child herself/himself once they are capable of making such orders
<p>Information contained in any enquiry you submit to us regarding Products and/or Services or to access your Data ("Enquiry Data").</p>	<p>The Enquiry Data may be processed for the purposes of offering marketing and selling relevant products and/or services to you or to respond to requests for information.</p>
<p>Information that is provided for the provision of our services to you ("Service Data").</p>	<p>The Service Data may be processed for the purposes of operating the Sites, providing our services, ensuring the security of the Sites, maintaining back-ups, preventing frauds of our databases and communicating with you.</p>
<p>Information relating to transactions, including purchases and delivery of products and services that you enter into with Juice Plus+, through the Sites ("Transaction Data"). The Transaction Data may include your contact details, the card/bank details provided and the transaction details.</p>	<p>The Transaction Data may be processed for the purpose of supplying the purchased products and services, allowing us to manage your order, keeping proper records of those transactions and processing the payment of the earnings you are entitled.</p>

Information that you provide to us, through the Sites, for the purpose of subscribing to our email notifications and/or newsletters (" Notification Data ").	The Notification Data may be processed for the purposes of sending you the relevant notifications and/or newsletters. If you do not wish to receive such mailings anymore, simply click on the "unsubscribe" link at the bottom of the email or contact us and/or as set forth under "Contact Us" below.
Information contained in or relating to any communication through the Sites (" Correspondence Data "). The Correspondence Data may include but is not limited to the communication content and metadata associated with the communication and eventually your response.	The Correspondence Data may be processed for the purposes of communicating with you and record-keeping.
Information celebrating your achievements and participation in the partner scheme, including photo, audio, and video material	Juice Plus+ training and advertising publications, including social media publications.

2. What is the legal basis for the collection and use of Data?

We collect, use, and share the data on the following legal basis:

- as is necessary to fulfil our contractual terms and/or taking steps, at your request, to enter into such a contract;
- as consistent with your consent, which you can amend, update, or revoke at any time;
- in compliance with the consent you provided to the analytics tracking third parties for the Usage Data;
- as necessary for our legitimate interests, including our interest to operate our business in accordance with legitimate commercial practice, for example to provide products and services and issue direct marketing;
- to train our staff and promote our service with other partners and to the public;
- to maintain accounts and records;
- to prevent and address fraud, unauthorised use of the Juice Plus+ products and services, violations of our terms and policies, or other harmful or illegal activity;
- to protect ourselves (including our rights, property or products), our users or others, including as part of investigations or regulatory inquiries; to secure systems and fight spam, threats, abuse, or infringement activities and promote safety and security across the Juice Plus+ Sites;
- internal group administration and administration of other relationships;
- as necessary to comply with our legal obligations; and
- to protect your interests, or those of others.

3. How is Data shared, transferred or disclosed?

<u>With Whom</u>	<u>Protection</u>
Group companies. When you provide information to us, we may use that information to provide information and services to you as requested. We may need to share your	<ul style="list-style-type: none"> • Whenever we share or transfer data to group companies, we require them to use your Data in accordance with this Policy.

<p>information with affiliated companies (including in the US, and Europe and the UK) to help operate, provide, improve, understand, customize, support, and market our Products and Services. This includes helping improve infrastructure and delivery systems, understanding how our Sites are used, and securing systems. We also share information to fight spam, threats, abuse, or infringement activities and promote safety and security across the Juice Plus+ Sites.</p>	<ul style="list-style-type: none"> Juice Plus+ currently uses Standard Contractual Clauses (SCC) for the transfers of data to the US and other jurisdictions where no adequacy decision is in place. This mechanism may be updated or replaced by Juice Plus+ from time to time with another legal mechanism.
<p>Other partners and customers. Your customers and upline/downline partners in your network and their Wellness Coordinator (where applicable) will receive your contact details so that they can contact you in relation to orders and the customer / business relationship. Your upline/downline partners and their Wellness Coordinator (where applicable) will also have access to your Transaction Data to the extent this is required in relation to their role in your network.</p>	<p>The sharing is limited to enable the performance and management of orders and payments to partners and Juice Plus+ Wellness Coordinators (where applicable).</p>
<p>Third-Party Service Providers. We work with third-party service providers to help us operate, provide, improve, understand, customize, secure, support, and market our Services.</p>	<p>When we share information with third-party service providers to perform support services for us, they may access your Data only for the purposes of performing those support services (in accordance with our instructions) and must keep your Data securely.</p>
<p>Authorities In addition to the specific disclosures of information as set out in the Policy, we may also have to disclose your information where such disclosure is necessary to protect your vital interests or the vital interests of another person, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure or in order to meet national security or law enforcement compliance.</p>	<p>When we share information with authorities, they may access your Data only on legitimate grounds and for the specified purposes.</p>

We may share or transfer your Data in the course of any direct or indirect reorganization process including, but not limited to, mergers, acquisitions, divestitures, and sales of all or part of our assets. Your Data may be shared following the completion of such transaction and/or during the assessment pending transfer (subject to confidentiality requirements). If transferred, your Data will remain subject to this Privacy Policy or a policy that, at a minimum, protects your privacy to an equal degree as this Privacy Policy unless you otherwise consent.

4. How long do we keep the Data?

We only keep your Data for as long as is necessary to satisfy the specified purposes and services that are related to you or that you have requested, providing that no legal requirements exist to the contrary such as in the case of retention periods required by trade or tax regulations or to resolve disputes. Call recordings are generally kept for six months. Your personal record will be kept for as long as it may be necessary for fiscal and similar purposes, or for the exercise-/defence of potential claims. If you would like to manage, change, limit, or delete your Data, please follow the instruction in **Section 8**.

5. How can you exercise your rights?

Under the General Data Protection Regulation or any other applicable privacy law, you have the right to access, rectify, port, and erase your information, as well as the right to restrict and object to certain processing of your information, unless the processing is based on compelling legitimate grounds or is needed for legal reasons.

Where we use your Data for direct marketing, you can always object and opt out of future marketing messages using the unsubscribe link in such communications.

You can update the delivery, payment or billing information, as well as other Data, you provided to us by logging-in to your Partner myjuiceplus.com and making the appropriate changes or corrections yourself by clicking the edit button next to "Contact Information". You may also de-activate your account, by contacting our Partner support team. Once you do so, your account will then be de-activated on a going-forward basis, although certain Data may still be retained to the extent necessary to fulfil our legitimate business needs, comply with applicable law, resolve disputes, and enforce our contracts.

To exercise your rights in all other cases, please contact us. Our contact details are in **Section 8** below.

6. How is Your Data secured?

At Juice Plus+ it is essential to protect Data against loss or theft, as well as unauthorized access, disclosure, copying, use or modification with security safeguards appropriate to the sensitivity of the Data, regardless of the format in which it is held. In this regard, we use various methods to safeguard Data. They include:

- Physical measures: Secured Server locations, restriction of access, and alarm systems.
- Technical tools: passwords and encryption, using generally industry best practices.
- Organizational controls: confidentiality agreements, limiting access on a need-to-know basis, staff training and security clearances.
- Online security: such as encryption and authentication tools to protect your Data from unauthorized use. Firewalls are utilized to protect our servers and network from unauthorized users accessing and tampering with files and other information that we store.
- We use Secure Sockets Layer (SSL) technology to protect your credit card information online and Juice Plus+, as a global organisation, has signed up to and aims to comply with the Payment Card Industry Data Security Standard (PCI DSS) which is managed by the PCI Security Standards Council (which was founded by American Express, Discover Financial Services, JCB, MasterCard Worldwide, and Visa International) in order to improve credit card security for customers. The PCI DSS is a multifaceted security standard that includes requirements for security management, policies, procedures, network architecture, software

design and other critical protective measures with a view to achieving ongoing development, enhancement, storage, dissemination and implementation of high security standards for account data protection. For more details on PCI DSS please refer to: <https://www.pcisecuritystandards.org>.

7. Cookies - How we use cookies

Our Sites make use of cookies. A cookie is a small removable data file that is stored by your web browser on your computer or device which often includes an anonymous unique identifier. We use cookies to allow you to set your individual preferences and to help us provide a better user experience. Cookies also help us to study traffic patterns on our Sites, store user preferences and track user trends on our Sites, so that we can understand which parts of our Sites are popular and make browsing an even more rewarding experience for our users. We use both session and persistent cookies; session cookies expire at the end of a particular visit to our Site, while persistent cookies (also called stored cookies) remain active until you disable them through your browser settings, or until a pre-set expiration date.

How to control cookies

Our cookie policy is under development, and you can follow the instructions provided by your browser or device (usually located under "Settings" or "Preferences") to modify your cookie settings. Please note that if you set your browser or device to disable cookies, certain of our Sites may not function properly.

8. How can you contact Juice Plus+?

In the event you have any question or concern regarding our use of your Data or about the Policy, or if you wish to amend, update, object to or restrict the collection and/or processing of your Data provided to Juice Plus+, or access to such Data, please click on the following link [contact our Data Privacy Team](#).

You can also contact our data protection team by email: **EMEA** - dsar.emea@juiceplus.com or our UK Data Protection Officer Aphaia Ltd at dpo@aphaia.co.uk. **US** - dpo.usa@juiceplus.com

In the event we are unable to resolve the issue to your satisfaction, then you have the right to contact the Data Protection Authority in your country.

Updated and effective January 2024

Copyright© 2024, The Juice Plus+ Company All rights reserved.