

ISAGENIX PRIVACY AND COOKIE POLICY

Last updated: 01/01/2020

Thank you for reading the Isagenix Privacy and Cookie Policy. Isagenix and all its associates in the are bound by its terms. In this Privacy and Cookie Policy we explain how we at Isagenix are committed to protecting the Personal Information that you share with us, and how we collect, use, and share that Personal Information.

a. What we mean by "Personal Information"

By "Personal Information," we mean any information relating to you, which identifies you or allows you to be identified, or that may be defined by applicable law in your country of membership. That may include, but not be limited to, your name, an ID number, location, an online identifier or factors specific to you (e.g. physical, physiology (thoughts, feelings), genetic, mental, economic, cultural or social factors).

b. Finding your way around this Privacy and Cookie Policy

This Privacy and Cookie Policy applies to you if you are one of the categories of individual set out in part 1 and you use any of our Sites. Key information about us and our use of our Personal Information is set out in part 2. Depending on the applicable law in your country of membership, you may have specific various rights in respect to your personal information, which are noted below in part 3. Further details of the categories of Personal Information we collect are and of our use and sharing of Personal Information are in part 4. A description of our use of cookies and similar technologies is in part 56. For feedback and queries please see part 7.

Before we start – an IMPORTANT NOTICE! If you are in any country, union, or economic area outside of the USA we will transfer your Personal Information to our parent company in the USA, Isagenix International LLC who will share it with their authorised service providers, and may also transfer your Personal Information to any country in which we operate. To the extent permitted by law, such submission also constitutes your consent for the cross-border transfer. For further details of the transfers please see part 2 section g.

Part 1: Overview



- a. Categories of individual to whom this Privacy and Cookie policy applies:
- website visitor someone who browses our Site but does not register or make a purchase
- **customer** end consumers who purchase Isagenix products as individuals acting for purposes which are wholly or mainly outside that individual's trade, business, craft or profession, and for their own personal use.
- **associate** someone who meets the requirements to become an "associate" as outlined in the Associate Terms and Conditions, who may purchase Isagenix products at wholesale prices and is eligible to resell those products, and who chooses to participate in the Isagenix compensation plan.
- mobile users a customer, associate or client or other individual who downloads and uses one of our mobile apps or browses our Site using a
 mobile device.

(We use the term "member" to mean anyone who registers/enrols with us: all customers, associates and clients will be "members".)

b. Our Sites and this Privacy and Cookie Policy

This Privacy and Cookie Policy applies to Personal Information collected on our public-facing websites, mobile site or associates' replicated websites, through Isagenix mobile applications, or controls/widgets embedded in communication platforms and linked to this Privacy and Cookie Policy ("Sites").

It covers how we collect, use, and share website visitors' and members' Personal Information as of the date that this Privacy and Cookie Policy was last updated.

The Privacy and Cookie Policy does not apply to any other information collected by Isagenix through any other means, or to any sites maintained or operated by other companies or linked to our Sites.

We may change this Privacy and Cookie Policy at any time. If we make any material change in how we collect, use, share, or otherwise process Personal Information, we will prominently post an updated Privacy and Cookie Policy on our Sites. Any material changes to this Privacy and Cookie Policy will be effective 10 days after our posting of the updated Privacy and Cookie Policy. Where required to do so by law, we may seek your prior consent to any material changes we make to this Privacy and Cookie Policy. If you disagree with our Privacy and Cookie Policy changes, you may de-activate your account.



Part 2: Key information

Below are important details about us and our use of your Personal Information and specific rights in respect to your personal information you may have based on applicable law in your country of membership.

Requirement	Isagenix details
a. Our identity and contact details	a. Isagenix World Headquarters
Identity and contact details and, where applicable, of the representative	155 E. Rivulon Boulevard Gilbert, AZ 85297 Office Phone Number: 480-889-5747
	Customer Care Phone
	1-877-877-8111 (toll free)
	480-889-5777
	480-636-5386 fax
	All calls will be recorded for quality purposes
	Customer Care Hours
	Monday – Friday: 6 a.m. – 6 p.m. Saturday: 6 a.m. – 2:30 p.m. Sunday: Closed
	b. Isagenix (United Kingdom) Ltd (company number 09895521).
	We are entered in the Information Commissioner's register of data controllers with registration number ZA189082.



Requirement	Isagenix details
	Registered office address: Lower Ground, Ground, First and Second Floors Watchmaker Court, 31 to 34 St John's Lane London EC1M 4DB
	Trading address: Lower Ground, Ground, First and Second Floors Watchmaker Court, 31 to 34 St John's Lane London EC1M 4DB
	Telephone: 0808 189 0490
	Email: privacyeu@isagenixcorp.com
	It would be very helpful if you would tell us exactly why you are contacting us. For example, to exercise a right by email, please put the name of the right in the subject line of the email.
	c. Isagenix (Asia Pacific) Australia Pty Ltd
	Level 2 85 Waterloo Road Macquarie Park, NSW 2113
	Customer Service Australia:
	1-300-651-979
	Hours
	Monday-Friday 8:00am-6:00pm (Australian Eastern Time)
	Email



Requirement	Isagenix details
	Compliance Enquiries
	ComplianceANZ@IsagenixCorp.com
	Customer Support
	CustomerServiceANZ@IsagenixCorp.com
	Event Enquiries
	EventsANZ@IsagenixCorp.com
	d. Ireland
	Isagenix (United Kingdom) Limited
	Lower Ground, Ground, First and Second Floors
	Watchmaker Court
	31 to 34 St John's Lane
	London
	EC1M 4BJ
	Customer Service:
	1 800 817 102
	Office Hours:



Requirement	Isagenix details
	Monday – Friday (excluding UK public holidays) 9 am - 5.30 pm
	Customer Service Hours:
	Monday, Tuesday, Thursday, Friday 9:00am-5:30pm
	Wednesday 10:00am - 5:30pm
	Opening hours above exclude public holidays.
	Email
	Compliance Enquiries
	ComplianceEU@IsagenixCorp.com
	Customer Support
	CustomerServiceIE@IsagenixCorp.com
	e. Belgium
	Isagenix (United Kingdom) Limited
	Lower Ground, Ground, First and Second Floors
	Watchmaker Court
	31 to 34 St John's Lane
	London



Requirement	Isagenix details
	EC1M 4BJ
	Customer Service:
	0 800 26 249
	Office Hours:
	Monday – Friday (excluding public holidays) 10 am - 6.30pm
	Customer Service Hours:
	Monday, Tuesday, Thursday, Friday 10:00am-6:30pm
	Wednesday 11:00am - 6:30pm
	Opening hours above exclude public holidays.
	Email
	Compliance Enquiries
	ComplianceEU@IsagenixCorp.com
	Customer Support
	CustomerServiceBE@IsagenixCorp.com
	f. Isagenix (Asia Pacific) New Zealand Limited
	PO Box 321, North Ryde NSW, 1670, Australia



Requirement	Isagenix details
	Customer Service New Zealand:
	0800-451-291
	Hours
	Monday-Friday 8:00am-6:00pm (Australian Eastern Time)
	Email
	Compliance Enquiries
	ComplianceANZ@IsagenixCorp.com
	Customer Support
	CustomerServiceANZ@IsagenixCorp.com
	g. ISAGENIX (ASIA PACIFIC) TAIWAN LIMITED
	Rm. 1, 1Fa, No.16, Sec. 4, Nanjing E. Rd., Songshan Dist., Taipei City 105, Taiwan (R.O.C.)
	Phone
	+886 0800 033 930 (toll-free)
	+886 2 2578 9677
	Hours
	Monday – Friday: 10:00am - 7:00pm



Requirement	Isagenix details
	Closed on Saturday, Sunday, and Public Holidays
	Email
	Customer Service
	customerservicetw@isagenixcorp.com
	h. Isagenix Holdings (Asia Pacific) Ltd.
	18th Floor, Podium Plaza, No.5 Hanoi Road, Tsim Sha Tsui, Kowloon, Hong Kong
	Phone
	Phone: +852 2779-0222
	Fax: +852 2779-2111
	Hours
	Monday – Friday: 11:00a.m. – 8.00p.m.
	Saturday: 12:00 p.m. – 5:00p.m.
	Sunday and Public Holidays: Closed
	Email
	Customer Support
	customerservicehk@isagenixcorp.com



Requirement	Isagenix details
	i. The Netherlands
	Customer Service:
	0 800 023 4002
	Customer Service Hours:
	Monday, Tuesday, Thursday, Friday 10:00am-6:30pm
	Wednesday 11:00am - 6:30pm
	Opening hours above exclude public holidays.
	Email
	Compliance Enquiries
	ComplianceEU@IsagenixCorp.com
	Customer Support
	CustomerServiceNL@IsagenixCorp.com
	j. Isagenix (Korea Asia Pacific) Limited
	518, Teheran-ro, Gangnam-gu,
	Seoul



Requirement	Isagenix details
	Republic of Korea
	Customer Service:
	+82 2 6206 3900
	Hours
	Monday – Friday (excluding public holidays) 9:00am - 6:00pm
	Saturday: 9am - 1:00pm
	Email
	Compliance Enquiries
	ComplianceKR@IsagenixCorp.com
	Customer Support
	CustomerServiceKR@IsagenixCorp.com
	k. Canada
	Customer Care Phone
	1-877-877-8111 (toll free)
	All calls will be recorded for quality purposes
	Customer Care Hours



Requirement	Isagenix details
	Monday – Friday: 6 a.m. – 6 p.m.
	Saturday: 6 a.m. – 2:30 p.m.
	Sunday: Closed
	*Times displayed are Arizona local time. Arizona does not observe Daylight Saving Time and will always remain as Mountain Standard Time (MST). During Daylight Saving Time (mid-March through early-November), Arizona is at the same time as California (Pacific Daylight Time or PDT).
	Email Customer Support
	Support@isagenixcorp.com
	I. Isagenix Mexico
	Lafontaine 120, Polanco M. Hidalgo, D.F. 11560
	Teléfono
	Desde Ciudad de México y Área Metropolitana 5029 6020
	Desde EE.UU. 011 52 55 5029 6020
	Isagenix® México
	Lafontaine 120, Polanco
	M. Hidalgo, D.F. 11560
	Monday to Friday: 9 a.m 6 p.m. Saturday: 9 a.m 2 p.m.



Requirement	Isagenix details
	Isagenix® Monterrey
	Plaza la Silla
	Av. Eugenio Garza Sada Sur No. 3755 Col. Country
	Monterrey, NL, Local D2-D25
	Monday to Friday: 9 a.m 6 p.m. Saturday: 9 a.m 2 p.m.
	Isagenix® Aguascalientes
	Plaza Patria
	José Ma. Chávez No.123 Local 18 Planta Alta, Col. Centro, Aguascalientes, Ags
	Monday to Friday: 9 a.m 6 p.m. Saturday: 9 a.m 2 p.m.
	Isagenix® Toluca
	Plaza San Fermín
	Avenida Heriberto Enríquez #904 local 24 colonia Aztecas, Toluca, Estado de México CP. 50180
	Monday to Friday: 9 a.m 6 p.m. Saturday: 9 a.m 2 p.m.
	Isagenix® Tuxtla
	4a. Poniente sur #344 Col. Centro Entre 2a. sur y 3a. sur CP. 29000 Tuxtla Gutiérrez Chiapas.
	Monday to Friday : 9 a.m 6 p.m. Saturday: 9 a.m. – 2 p.m.
	Horarios Call Center



Requirement	Isagenix details
	Lunes a Viernes de 9 am -7pm
	Sábado de 9 am -2pm
	Hora Central
	Email
	Preguntas sobre noticias
	serviciomx@isagenixcorp.com
	m. Isagenix (Spain), S.L.U.
	Customer Service:
	900 423 614
	Customer Service Hours:
	Monday, Tuesday, Thursday, Friday 10:00am-6:30pm
	Wednesday 11:00am - 6:30pm
	Opening hours above exclude public holidays.
	Email
	Compliance Enquiries
	ComplianceEU@IsagenixCorp.com



Requirement	Isagenix details	
	Customer Support	
	CustomerServiceES@IsagenixCorp.com	
b. Purposes and legal basis	The purposes for which we use Personal Information are:	
Where required by applicable data protection	to conduct our business and co-branded businesses	
law, including the GDPR, our processing of	to maintain our accounts and records and keep our records up to date	
your personal information will be justified on a	to promote and advertise our products and services	
lawful basis. The purposes of the use for which the Personal Information is intended as well as	to support and manage our associates	
the legal basis for the use	with consent, for direct marketing	
the legal basis for the use	to provide personalised recommendations	
	with consent, to provide events and roadshows to associates (we use service providers to do this)	
	with consent, for analysis by aggregating associates' Personal Information (for example to provide very line of the letter of the provide and a very forms) (we use a sortion provides to do this).	
	rankings/tabulated statistics and event itinerary forms) (we use service providers to do this)	
	to provide products and services (this is necessary for contract performance) to provide fulfillment and containing or other contract performance.	
	 to provide fulfilment, advertising or other services to other merchants or co-branded businesses (since we do not manufacture or produce it 	
	 ems such as shirts, hats and bags) (fulfilment is necessary for contract performance) 	
	 to verify prospective members' identities (this is a necessary step before entering into a contract) 	
	 to verify prospective members identifies (this is a necessary step before entering into a contract) to operate our Sites 	
	 to be at each of sites to help detect and prevent fraud, and 	
	• to help detect and prevent hadd, and	



Requirement	Isagenix details
	for diagnostics. We have set out above where we obtain consent, or the use is necessary for contract purposes. In all other cases, the legal basis for our use is our own or our service providers' legitimate interests.
c. Legitimate interests Where the use of information is based on the legitimate interests condition under applicable law, the legitimate interests pursued	Our legitimate interests are to operate our business in accordance with legitimate commercial practice, for example to provide products and services, to maintain accounts and records, and for PR and advertising. Some examples are included in the indirect categories section e below. For further details please see the "Isagenix business activities" in part 5 section 5.3 below.
	Our merchants, co-branded businesses and service providers' legitimate interests are for service provision and operating their businesses, as set out in more detail in the purposes section c above and the indirect categories section e below.
d. Recipients	We may share your Personal Information with:
The recipients or categories of recipients of the Personal Information, if any.	 business associates; for example: merchants and co-branded businesses (if you buy one of their products or services through our Site) associates (who receive information about their clients) and upline sponsors (who receive information about associates in their downline) this is because we are a direct selling company, and we share this information to provide associates and upline sponsors with credit for orders and associate enrolments if you give them your consent, the associate or upline sponsor may use your Personal Information for their own marketing purposes. suppliers (for example service providers) financial organisations



Requirement	Isagenix details	
	 consultants and professional advisers credit reference agencies debt collection agencies group companies a prospective purchaser of all or a part of our business 	
	and other recipients as permitted or required by applicable law.	
	Whatever the purpose may be – whether we share with service providers or other external companies – we only use and share your Personal Information to the extent reasonably necessary to fulfil your requests and our legitimate business objectives/interests. When we disclose Personal Information to external companies to perform support services for us, they may access and process your Personal Information only for the purposes of performing those support services (in accordance with our instructions and only on our behalf) and must keep your Personal Information secure. These authorised service providers are prohibited from selling, retaining, using, or disclosing your personal information.	
Part 3. Rights in respect to your personal information		
Before you read on, a quick word about UK/EU independent associates ("associates").	Q. How does this Privacy and Cookie Policy relate to associates' use of your Personal Information? A. It doesn't!	
	Isagenix is the controller of Personal Information collected through the Sites, which includes associates' replicated websites. For queries about Isagenix's use of your Personal Information please contact us.	



Requirement	Isagenix details
	Associates are separate controllers from Isagenix. Isagenix requires associates to use your Personal Information in a manner consistent with this Privacy and Cookie Policy, the Independent Associate Terms and Conditions, and their Isagenix Independent Associate Application and Agreement ("IAAA"). As a general policy, Isagenix Associates may only process your personal information on our behalf and for the business purpose of marketing Isagenix products, and services. Associates are prohibited from selling, using, retaining, or disclosing your personal information otherwise.
a. Rights afforded in the European Union/UK: Transfers outside of the European Economic Area (EU member states, Norway, Iceland and Liechtenstein)	Our Sites are hosted in the US and your Personal Information will therefore be transferred to Isagenix International LLC's US-based data centres. Isagenix International LLC is our parent company. They will use your Personal Information in accordance with this Privacy and Cookie Policy, including sharing it with Isagenix authorised service providers, (please see part 5 section 5.3). Because of the way our direct selling model works, we may also transfer your Personal Information to any country in which we operate. Your continued use of this Site constitutes your consent to these transfers. Please read on.
Where applicable, the fact that Personal Information is to be transferred to a third country or international organisation and the existence or absence of an adequacy decision by the European Commission, or	Here is a short explanation of the options for transferring Personal Information outside the EEA. First, an "adequacy decision" which is a legal decision by the European Commission that adequate protection is provided by a country, territory, specified sector(s) or an international organisation. It is based on an assessment of the following: (a) rule of law and other legal considerations (b) existence and functioning of an independent supervisory authority and (c) international commitments and obligations/participation.
in the case of transfers subject to appropriate safeguards or non-repetitive, limited transfers based on compelling legitimate interests, reference to the appropriate or suitable safeguards and the	 Secondly "appropriate safeguards" which may take several forms, including: standard data protection clauses adopted by the European Commission other contract clauses that have been approved by the Information Commissioner "binding corporate rules" which apply to a group of companies or enterprises engaged in a joint economic activity



Requirement	Isagenix details
means by which to obtain a copy of them or where they have been made available.	an approved code of conduct or approved certification mechanism, which binds the organisation in the third country and can be enforced.
	As at May 2017 (the original date of this Privacy and Cookie Policy):
	the USA does not have an adequacy decision
	 Isagenix International LLC has not joined the EU-US Privacy Shield, which has an adequacy decision there are no appropriate safeguards in place between us and our parent company or with other group companies in other countries in which we operate (please go to the home page of our Site and click "select language" in the bottom right hand corner for a list) our transfer of your Personal Information is based on an exception (derogation), namely your consent to the transfer. Please note that the absence of an adequacy decision and appropriate safeguards creates possible risks that you will not have the same rights and remedies in respect of the processing of your Personal Information once it is the USA or other non-EEA countries as you would have in the EU. IF YOU PREFER NOT TO HAVE YOUR PERSONAL INFORMATION TRANSFERRED TO THE UNITED STATES OR ANY OTHER COUNTRY IN WHICH WE OPERATE, PLEASE DON'T USE THIS SITE.
General individual rights The existence of the right to request access to and rectification or erasure of Personal Information or restriction of use	 You have rights to make a request to us: for access to your Personal Information for rectification or erasure of your Personal Information (until 25 May 2018, this is only where the Personal Information is inaccurate for the EU, or from the date such right is provided for under the laws of the country of your membership)



Requirement	Isagenix details
concerning the individual or to object to use as well as the right to data portability	 for restriction of processing concerning you (until 25 May 2018, this is only where the Personal Information is inaccurate for the EU, or from the date such right is provided for under the laws of the country of your membership) to object to our processing which is based on legitimate interests (until 25 May 2018, this is only where the processing is or is likely to cause substantial and unwarranted damage or distress for the EU, or from the date such right is provided for under the laws of the country of your membership) to object to direct marketing (including, from 25 May 2018, to object to related profiling for the EU, or from the date such right is provided for under the laws of the country of your membership) to port data you have provided to us, either to you or to another provider (from 25 May 2018 for the EU, or from the date such right is provided for under the laws of the country of your membership). If you are a member you can access some information yourself. Please see part 4 section 4 below. To exercise your rights, please contact us. Our contact details are in the "Identity and contact details" section a above.
Withdrawal of consent	You have a right to withdraw any consent you give us at any time.
Where the use is based on consent (for ordinary or sensitive Personal Information), the existence of the right to withdraw consent at any time, without affecting the lawfulness of use based on consent before its withdrawal	This will not affect the legality of our consent-based use before you withdrew consent. To exercise your right to withdraw, please contact us. Our contact details are in the "Identity and contact details" section above.



Requirement	Isagenix details
Data protection officer and queries Contact details of the data protection officer, where applicable	We do not have a data protection officer. If you have any questions, have a complaint, or wish to send us comments about this Privacy and Cookie Policy, e-mail, call or write to us. We will investigate your complaint, and use reasonable efforts to respond to you as soon as possible. Our contact details are in the "Identity and contact details" section below. Until 25 May 2018, we will be entered in the Information Commissioner's register of data controllers with registration number ZA189082. If you have any questions, have a complaint, or wish to send us comments about this Privacy and Cookie Policy, contact us at the information provided below that applies to your country of membership. We will use reasonable efforts to respond to you as soon as possible.
Complaints The right to lodge a complaint with a supervisory authority	You have a right to complain to the Information Commissioner, whose contact details are: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF England Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate).



Requirement	Isagenix details
	Website: https://ico.org.uk_which sets out email addresses and an email form.
Rights afforded in California:	If you are a California resident and consumer, and as of January 1, 2020, you have certain rights to make a request to us:
	for disclosure and delivery of a copy of the categories and specific pieces of Personal Information we have collected about you, including the sources of the Personal Information, the business or commercial purpose for collecting the Personal Information, the categories of Personal Information we have disclosed for a business purpose, the categories of third parties with whom we share it; and/or
	for deletion of your Personal Information, subject to certain exceptions.
	To make any of these requests, please contact us at privacy@isagenixcorp.com or toll-free at 877-877-8111. For your protection, we may need to verify your identity before fulfilling your request. Requests for disclosure and copies of personal information are limited to twice in a 12-month period. We may not and will not discriminate against any California resident and consumer because you exercise any of these rights.
	See sections 4 & 5 below for categories of Personal Information Isagenix;
	 collects about consumers; and may disclose about consumers for a business purpose
	We do not sell personal information that we have collected. We have not sold consumers' personal information in the preceding 12 months.
	Subject to certain limits under California Civil Code § 1798.83, if you are a California resident, you may make a request to us:



Requirement	Isagenix details
	 for a list of certain categories of Personal Information that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and for the identity of those third parties; and/or not to share your Personal Information with third parties for their direct marketing purposes.
Rights afforded in Australia and New Zealand:	For Australian and New Zealand members: This Privacy and Cookie Policy recognises its responsibilities in relation to the collection, use and disclosure of personal data under the Privacy Act 1988. In this regard, personal data (as defined under the Act) will be collected only for the lawful and relevant purposes noted within this policy and all practicable steps will be taken to ensure that personal data held by Isagenix is accurate, and to avoid unauthorised or accidental access or other use.
	Access and Corrections to your Personal Information:
	You are entitled to request access to or the correction of the Personal Information we may collect and/or hold about you.
	We take such steps as are reasonable in the circumstances to ensure that your Personal Information is accurate, complete and up to date. This includes correcting Personal Information we identify as being incorrect or where you are able to demonstrate that the Personal Information we hold about you is incorrect.
	If at any time, you wish to access your Personal Information, or you find that the Personal Information we hold about you is inaccurate, incomplete, out-of-date, irrelevant or misleading, please contact us. Our contact details are in the "Identity and contact details" section a above. If we fail to respond to a request within a reasonable period of receiving it in writing, or if you are dissatisfied with the response that you receive from us, you may lodge a complaint with the Office of the Australian Information Commissioner ("OAIC"). Details of how to contact the OAIC are located at www.oaic.gov.au.



Requirement	Isagenix details
Rights afforded in Mexico	For members in Mexico: This Privacy and Cookie Policy, is provided for the knowledge of our Isagenix members or those interested in the business opportunity in Isagenix in accordance with the provisions of the Federal Law on Protection of Personal Data Held by Individuals, and in compliance with the obligation of Isagenix México, to protect Personal Data of the individuals with whom you establish a business relationship.

Part 4. Personal Information we collect

Here are some further details of the Personal Information we collect (directly or indirectly).



a. Information collected directly – Whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the individual is obliged to provide the Personal Information and of the possible consequences of failure to provide that information:

Photos and biometric data will be collected if an associate or preferred customer joins an "IsaBody" challenge. This is a necessary requirement of participation in the challenge.

To ensure we act responsibly, an ID verification check is required if you apply to be a member.

To buy products and services from us, and enable us to fulfil your order, you must provide certain Personal Information to us.

b .Personal Information collected indirectly - categories

We collect the following categories of Personal Information indirectly (i.e. from third parties):

- updated delivery and address information from our carriers or other third parties which we use to correct our records and deliver your next purchase or communication more easily
- account information, purchase or redemption information and page-view information from some merchants with whom we operate co-branded businesses or for whom we provide technical, fulfilment, advertising or other services
- search results and links, including paid listings (such as sponsored links)
- information from credit reference agencies, which we use to help prevent and detect fraud (by verifying identity)
- registration details from a family member (e.g. a spouse) who enrolls you as an associate (if you do this yourself, please make sure you have the other person's prior consent)
- your name, address and phone number, if a member sends you one of our products (e.g. as a gift).



c. Information we collect automatically on all website visitors

- the Internet protocol (IP) address used to connect your computer/mobile device to the Internet
- login, e-mail address, password (if you are enrolled/registered)
- · computer and connection information such as
 - browser type and version
 - o time zone setting
 - browser plug-in types and versions
 - operating system
 - the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time)
 - o cookie number
 - products you viewed or searched for
 - o any phone number used to call our customer service number.
- browser data such as
 - o cookies (please see part 6)
 - Flash cookies (also known as Flash Local Shared Objects), or similar data on certain parts of our Site to support fraud prevention and other purposes, such as to gauge viewing patterns of videos on our Sites.
- session information collected via software tools such as JavaScript including
 - o page response times
 - download errors
 - length of visits to certain pages
 - o page interaction information (such as scrolling, clicks, and mouse-overs), and
 - o methods used to browse away from the page.
- technical information to help us identify your device for fraud prevention and diagnostic purposes.



d. Information we collect on users of our mobile apps

We collect the same information as we do for website visitors, but focused on technologies associated with mobile devices including location services provided by mobile devices if enabled. For further details please see part 5 section 5.1.2.

e. Information we collect on customers, associates and clients (members)

As well as your name, postal or billing address, e-mail address and telephone or mobile number, we will collect your purchase history, which we sometimes aggregate with similar information from other members to create features such as Best Sellers. For example, as a member you provide information when you: search for a product; place an order through an associate's Site or through one of our third-party partners; provide information in My Account (you might have more than one if you used more than one e-mail address when shopping with us), post, participate in a contest or questionnaire or communicate with customer services. As a result of those actions, you might supply us with information such as: name; address and phone number; credit card information (please note that we use a tokenizer to store the credit information; we do not store credit card details); people to whom purchases have been dispatched (including addresses and phone numbers); people (with addresses and phone numbers) personal description and photograph if participating in the IsaBody Challenge, and financial information as needed to conduct business (e.g. VAT ID).

We also collect information from other sources (please see part 2, section m above), including in connection with offering joint or co-branded products and services (please see part 2, section e above).

f. Information we have that you can access too if you are a member

Examples of information a member can access include: up-to-date information regarding recent orders; personally identifiable information (including name, e-mail, password, communications and personalised advertising preferences, address book); payment settings (including credit-card information and gift voucher, gift card and cheque balances); e-mail notification settings (including Product Availability Alerts, Delivers, Special Occasion Reminders, and newsletters); recommendations (including Recommended for You and Improve Your Recommendations).



g. Sensitive (special categories of) Personal Information

Photos and biometric data (for example before and after photos) will be collected if an associate or preferred customer joins an "IsaBody challenge".

h. The sources of the Personal Information we collect indirectly are:

- our carriers or other third parties (updated delivery and address information)
- merchants with which we operate co-branded businesses or for which we provide technical, fulfilment, advertising or other services (account information, purchase or redemption information and page-view information)
- search engine providers (search results and links, including paid listings (such as sponsored links))
- credit reference agencies (ID validation information)
- family members (where a family member enrolls an associate)

members (e.g. where a member sends our products to a friend or family member as a gift).

i. Automated decision-making

We undertake data analytics on purchases, downline and members to understand how we can improve our business model to enhance a member's interaction with us. We also use web analytics on our Sites which affects website visitors (please see part 6).

We do not base profiling on special categories of Personal Information, that is Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

<u>Meaningful information about the logic involved</u>: we use certain categories of Personal Information described in part 4 (namely the Personal Information listed in sections 1 – website visitors; 2 – mobile users; 3 - members), to create a profile. The source of this Personal Information is you or other sources (see section m (sources)). This Personal Information is directly relevant to improving our business model as set out above.



<u>Significance and envisaged consequences for you</u>: as a result of data analytics, you may see different recommendations depending on your purchases and browsing or a new feature on the Site; data analytics also helps keep you and other members safe from fraudulent activity.

j.Storage period

The period for which the Personal Information will be stored, or if that is not possible, the criteria used to determine that period. The period for which we will store Personal Information is based on our need to fulfil our legitimate business needs, comply with applicable law, resolve disputes, and enforce our agreements.

Part 4. Further details of our collection, use and sharing of Personal Information

a. What types of Personal Information do we collect about our online visitors?

Information you provide.

We generally collect only Personal Information you voluntarily provide to us or which is collected through cookies or similar technologies (please see section 5.2 of this part 5 below and part 6). For some secure areas of our Site, however, we require you to provide Personal Information when you use specific features. For example, we collect Personal Information from you when you:

- Ask to register for an account with us
- Sign up for newsletters
- Buy our products at one of our Sites
- Participate in promotions or surveys
- Submit comments, reviews, or other user-generated content
- Connect or interact with us through social networks (e.g., Facebook, Google+, Twitter), and
- Request customer or technical support.



This Personal Information, for example, may include your:

- Name
- Postal or billing address
- E-mail address
- Telephone or mobile number
- Payment card information
- Location via IP address
- Device being used (for our mobile site), and
- Previous shopping history with Isagenix.

(Please see part 4 above for details of the categories of Personal Information we collect.)

If you can't or choose not to provide us with the Personal Information we reasonably require, we may be unable to provide you with the information or products you have requested.

<u>Information collected through technology.</u>

We also obtain information in other ways through technology. Some of this information may be linked to you personally. This information helps our Sites function correctly and supports the work we do to understand the needs of our customers.

Device Information. Depending on the permissions you've granted, we may receive information about your location and your mobile device when you download or use our apps, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, and other personalised content. Examples of the device information we collect include:

- Attributes such as the operating system, hardware version, device settings, file and software names and types, battery and signal strength, and device identifiers
- Device locations, including specific geographic locations, based on information we are provided through Apple and Android APIs for location services and country identifier, and



 Connection information such as the name of your mobile operator or ISP, browser type, language and time zone, mobile phone number and IP address.

Most mobile devices allow you to turn off location services, and we encourage you to contact your device manufacturer for detailed instructions on how to do that.

Payment Information. We use a third-party payment service to process payments made by credit and debit cards. When you reach the checkout stage of our ordering process, the credit/debit card details you provided are securely passed directly to our service provider to authorize the transaction with your bank or credit card company, your Personal Information will be collected by such third party and not by us, and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for this third party's collection, use, and disclosure of your Personal Information.

Do we advertise online?

We advertise in a number of ways, including online through managed social media presences, and on other unaffiliated sites and mobile applications. To understand how our advertising campaigns are performing, we may collect certain information via our Sites through our advertising service providers. We or our suppliers use several common online tracking tools to collect this information, such as browser cookies, web beacons and other, similar technologies. The information we collect includes IP addresses, the number of page visits, pages viewed via our Sites, search engine referrals, browsing activities over time and across other websites following your visit to one of our Sites or applications, and responses to advertisements and promotions on the websites and applications where we advertise.

We also use certain information to:

- Present tailored ads, including banner ads and splash ads that appear as you log-in or off of your online accounts via our Sites
- Identify new visitors to our Sites
- Recognise returning visitors
- Advertise on other websites and mobile applications not affiliated with us
- Analyse the effectiveness of our advertisements
- Better understand our audience, customers, or other Site visitors, and
- Determine whether you might be interested in new products or services.



Controlling our tracking tools. Your browser may give you the ability to control cookies. How you do so, however, depends on your browser and the type of cookie. Certain browsers can be set to reject all browser cookies. If you configure your computer to block all cookies, you may disrupt certain web page features, and limit the functionality we can provide when you visit or use our Sites. If you block or delete cookies, not all of the tracking that we have described in this section will stop and our Site may stop working in part or completely. Some browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are still not uniform, so we are not currently set up to respond to those signals.

For more information about our ad service provider and its cookies, including information about how to opt out of these technologies, you may visit www.aboutads.info/choices. In addition, users may prevent Google's collection of data generated by your use of the Sites (including your IP address) by downloading and installing a Browser Plugin available at https://tools.google.com/dlpage/gaoptout?hl=en. Please also see part 6 (cookies) for further information.

How we use and share your Personal Information?

Isagenix business activities. We use your Personal Information to:

- Respond to your questions, complaints, or reviews of our product or services
- Administer contests, promotions, or surveys
- Send you communications about online transactions, product information, ads and promotions, electronic newsletters, or other notices or
 offers tailored to you
- Enable our advertisers to provide you with more personalised content, and track the effectiveness of certain advertising campaigns
- Comply with applicable law, obey judicial orders, cooperate with law enforcement authorities, or prevent any suspected illegal activities
- Help us run our business, or
- For any other everyday business purposes, such as product development and Site administration.

Authorised service providers. We use other companies and individuals to perform certain functions on our behalf. Those functions include payment card processors, delivery, call-centre support, analysing or hosting data on cloud-based servers, and other companies that help us improve our



products and services. We may disclose your Personal Information to these companies and other individuals performing services on our behalf in the UK, in the United States and in Mexico or in any other country in which we operate.

As authorised service providers, these entities will only process your Personal Information on behalf of Isagenix and in accordance with the business purpose as agreed upon with Isagenix. These authorised service providers are prohibited from selling, retaining, using, or disclosing your Personal Information.

Sale of the businesses. If we sell all or part of our business, Personal Information may be transferred to the buyer in connection with that transaction. We will use reasonable efforts to include contractual provisions that require the buyer to treat your Personal Information as set out in this Privacy and Cookie Policy.

Other disclosures. We may otherwise disclose Personal Information as permitted or required by law, when we believe in good faith it is necessary for safety purposes, required for legal reporting, or to protect our legal rights or enforce our Terms of Use or any applicable rules, or to protect the rights of others. We may also disclose Personal Information to our auditors, legal advisers, or to respond to a court order. We may also aggregate information that we gather about you (e.g., online sales, traffic patterns) and provide these statistics to others in aggregate form.

What choices do you have about the collection, use, and sharing of your Personal Information?

If you signed up to receive newsletters or other marketing communications from us, you can opt-out any time by clicking the unsubscribe link at the bottom of the message. You can also log-in to your account to opt-out and update your marketing preferences at any time. Even after you opt-out or update your marketing preferences, please allow us sufficient time to process your marketing preferences. It may take up to 10 days to process your e-mail related requests, and up to 30 days for all other marketing-related requests. And even after you've opted-out of receiving marketing communications from us, we may still contact you for transactional or informational purposes. These include, for example, customer service issues, returns or product-related inquiries, surveys or recalls, or any questions regarding a specific order.

How can you access, update, or block your Personal Information?

You can update the delivery or billing information, as well as other Personal Information, you provided to us by logging-in to the My Account page and making the appropriate changes or corrections yourself by clicking the edit button next to "Contact Information". You can also update your newsletter



preferences by logging-in to the My Account page or contact us directly at the address below. If you wish to de-activate your account, you may do so by contacting our customer support team at support@isagenixcorp.com. Once you do so, your account will then be de-activated on a going-forward basis, although certain Personal Information may still be retained to the extent necessary to fulfil our legitimate business needs, comply with applicable law, resolve disputes, and enforce our agreements.

Part 5. Cookies and similar technologies

a. Introduction

A cookie is a file containing a small amount of information that a Site places on your device. Similar technologies include:

- Local shared objects (Flash cookies) data that websites which use Adobe Flash store on your device
- Local storage (session storage and database storage) a type of file placed on your device that can hold data, often related to video or audio content
- Pixels (also known as clear gifs, web beacons or web bugs) are code used on a web page or in an email notification. They are used to learn whether you've interacted with certain web or email content. This helps to measure and improve services and personalise your experience.

We use cookies and similar technologies to help us understand how people interact with our Sites. That means we can make improvements and develop the Sites in an informed way for our website visitors and members. It helps us improve your overall experience.

b. What cookies do we use?

We use these types of cookie	for these purposes
Strictly necessary cookies . These cookies are generally used to store a unique identifier to manage and identify you as unique to other users currently viewing the Site, in order to provide you with a consistent and accurate service.	To remember previous actions (e.g. entered text) when navigating back to a page in the same session, managing logins and other security features, and to route visitors to specific versions of a Site and to remember items put into an online shopping basket.



Performance cookies. These cookies are used for performance and to improve the Site.	For web analytics (we use Google Analytics – see how Google uses your data here: www.google.com/policies/privacy/partners), ad response rates, affiliate tracking, error management and testing designs.
Functionality cookies . These cookies will typically be the result of something you do but might also be implemented in the delivery of a service not explicitly requested but offered to you. They can also be used to prevent you being offered a service again that had previously been offered to you and rejected.	To remember settings such as layout, font, preferences, colours; to remember a choice such as not to be asked again to complete a questionnaire; to provide information to allow an optional service such as a live chat session or to fulfil a request from you to submit a comment.
Targeting or advertising cookies. These cookies contain a unique key that is able to distinguish individual users' browsing habits or store a code that can be translated into a set of browsing habits or preferences using information stored elsewhere. Cookies may also be used to limit the number times a user sees a particular ad on a Site and to measure the effectiveness of a particular campaign.	With similar technologies, for online advertising, which is described in more detail in part 5 section 5.2.

c. How to see individual cookies and opt out of cookies and similar technologies

a. Cookies

Cookies change and their names and descriptions are not very user-friendly for most people, so we haven't listed them individually. If you want to see the cookies currently used on the Sites, they should be visible through your browser. (Please see below for instructions.)

To control or opt out of cookies, please adjust your browser settings.

There are different browsers and manufacturers upgrade them frequently. The best way to get the right instructions is to go to the manufacturer's support page. The following support/privacy pages (for some of the more common browsers) are correct as at May 2017.



- For Chrome, please see Google's support page here: https://support.google.com/chrome/answer/95647
- For Internet Explorer, please see Microsoft's support page here: https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies
- For Edge, please see Microsoft's privacy page here: https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy
- For Firefox, please see Mozilla's support page here: http://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
- For Safari, please see Apple's support page here for Macs: https://support.apple.com/kb/PH21411 and here for mobile devices: https://support.apple.com/en-us/HT201265.

If you have problems with these pages, can't see individual cookies or want find out more about how cookies are handled within your browser, please go to the manufacturer's site and search for the browser name and your cookie guery.

b. Flash cookies

To disable flash cookies (local shared objects) go to the Global Storage Settings panel of the online Settings Manager at Adobe's website at http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager03.html. This places a permanent flash cookie on the device, informing all other websites that you do not want flash cookies stored on your device.

c. Online advertising cookies

We use cookies and similar technologies for online advertising, as described in part 5 section 5.2. To find out more and opt out, please visit www.aboutads.info/choices.

You may prevent Google's collection of data generated by your use of the Sites (including your IP address) by downloading and installing a browser plugin available at https://tools.google.com/dlpage/gaoptout?hl=en.

d. Local and session storage

You can delete local storage, session storage and database storage in the same way that you delete cookies.

e. Pixels



You cannot delete pixels but you may be able to disable them by disabling cookies or by using browser add-ons or extensions. Some pixels in emails can be disabled by selecting an option in your email application not to download images.

Please be aware that restricting cookies and similar technologies may impact on the functionality of our Site.

f. Further information

To find out more about cookies, including how to see what cookies and other technologies have been set and how to manage and delete them, please visit http://www.allaboutcookies.org/ and http://www.youronlinechoices.com/.

g. Feedback

For feedback or queries on this Privacy and Cookie Policy or to exercise your rights, please contact us. Our contact details are in the "Identity and contact details" section a in part 3 above.

