EUROPEAN UNION'S GENERAL DATA PROTECTION REGULATION (GDPR)

FREQUENTLY ASKED QUESTIONS

The following information is being provided by Isagenix to assist Isagenix Independent Associates in better understanding how the GDPR may impact their independent businesses. It is not a complete guide to the law and does not constitute legal advice.

WHAT IS THE GDPR?

GDPR is the acronym for the European Union's General Data Protection Regulation, a binding legislative act which became effective May 25, 2018. It unifies data protection laws across the entire EU and is designed to protect the data and privacy of all EU residents wherever their information is used throughout the world. The GDPR includes additional regulations regarding the use of information that is exported outside the EU.

IS ISAGENIX IN COMPLIANCE WITH THE GDPR?

Yes. For over a year, a cross-department team and outside legal counsel have been working to prepare Isagenix for the GDPR. The goals of the GDPR align with our company's data security objectives, as we continually seek to ensure the confidentiality, integrity, and availability of the personal data we store and process. We maintain appropriate technical and organizational security measures to protect personal data against accidental and unlawful destruction, loss, and alteration as well as unauthorized disclosure and access.

SINCE ISAGENIX IS ALREADY RESPONSIBLE FOR COMPLYING WITH THE GDPR, DOESN'T THAT ALSO COVER ME?

Not entirely. Since Associates are independent contractors, you are responsible for complying with the GDPR when it comes to your use and maintenance of EU residents' personal data. Isagenix is responsible for complying with the GDPR for information maintained on our systems. However, once you access personal information either directly through Isagenix systems or through your own data collection and record maintenance, you are accountable for protecting the data and using it responsibly. Therefore, it is important you become familiar with the GDPR and follow the procedures to ensure you are complying with regulations.

WHERE CAN I FIND MORE INFORMATION ABOUT THE GDPR?

Data Protection Authorities (DPAs) in each EU country are responsible for enforcing the GDPR. If a business does not comply with GDPR obligations, the applicable DPA(s) can issue a warning, suspend or ban data processing activities, or impose fines. A list of DPA website addresses and other contact information for each EU country can be found here. Additional information about data protection can be found here.

WILL THE GDPR MAKE IT DIFFICULT FOR ME TO DO BUSINESS IN THE EU?

Not if you follow sound business practices. While it may sound intimidating, the GDPR is about treating other people's personal information with care and respect. These FAQs are intended to help you navigate GDPR regulations and provide some basic guidance to help your business.

SHOULD I PAY ATTENTION TO THE GDPR IF I AM NOT AN EU CITIZEN?

Yes. The GDPR applies to any person or entity that does business with or holds or processes the personal data of EU residents. If you have Customers or team members who reside in the EU, you must comply with GDPR. Under GDPR, you are responsible for protecting the information you choose to maintain regarding your Customers and team members.

DO I NEED TO REGISTER OR PAY A FEE?

That depends on your business. You should review the DPA websites for each country where you conduct business to determine if registration or fees are required. For example, if you do business in the U.K., check here to complete an assessment to determine if you need to pay a fee. Failure to pay a required fee will result in a fixed penalty, so be sure to take this assessment right away.

WHAT SHOULD I DO IF I BELIEVE INFORMATION REGARDING MY ISAGENIX BUSINESS HAS BEEN COMPROMISED?

If you believe someone has accessed your Isagenix account or any Isagenix system that contains your personal information or that of your Customers or team members, contact our data protection officer immediately at PrivacyEU@IsagenixCorp.com. If the security breach involves U.K. residents, you may need to file a report with the Information Commissioner's Office (ICO) within 72 hours by calling the ICO help line at 0303 123 1113 or filling out their online form.

ARE THERE SOME GENERAL GUIDELINES I SHOULD FOLLOW REGARDING THE PROTECTION OF MY CUSTOMERS' AND TEAM MEMBERS' PERSONAL INFORMATION?

While Isagenix can't provide legal advice to Independent Associates, here are some good business practices you should follow for ALL your operations to protect you, your Customers, and your team members:

- Make sure your own personal information in Isagenix systems is accurate and up to date, including information in your Back Office or any other Isagenix-provided website, app, or system.

- Always have your Customers enter their own account information into Isagenix systems. Not only will this protect their privacy, but it will also help ensure the accuracy of their personal information, product preferences, and payment and delivery options.

- Treat all personal information as if it's a large pile of money — it's valuable! For example:
  - Don't leave personal information where it can be compromised or stolen.
  - Protect the confidentiality of personal information.
  - Avoid security breaches that may result in unintended destruction, loss, change, disclosure, or access of data either mistakenly, or deliberately and illegally.

- Treat information collected offline with the same care as digital data.

- Always be open and transparent with others about how you'll use their information, whether you receive the information directly from them or from another source. Confirm that they approve the use of their information, and obtain their written consent, particularly when dealing with EU residents, since the GDPR requires proof of consent. Don't use personal information for any purpose other than the one for which you have received specific consent.

- Respect others' choices. If they don't want you to contact them, then don't. If they ask you to stop contacting them after previously giving their consent, don't continue to contact them or try to convince them to stay connected. Remember that consent can be withdrawn at any time, so always be respectful of requests to remove information from your records. Under the GDPR, you must honor these requests within one month.

- Be careful not to inadvertently violate someone's privacy. For instance, it's appropriate to update a Customer's data if they personally provide this new information; however, it isn't appropriate to seek such data indirectly, since they may not wish for you to have it.

18-AL021-C-IsagenixCompliance.com - European Union's General Data Protection Regulation (GDPR) 011419

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