



ISAGENIX INTERNATIONAL, LLC PRIVACY AND COOKIE POLICY

Effective Date: May 11, 2026

Thank you for reading the Isagenix Privacy and Cookie Policy. In this Privacy and Cookie Policy we explain how we at [Isagenix](#) (as summarized in Part 2(A)) are committed to protecting the Personal Information that you share with us, how we collect, use, and share that Personal Information, and your rights with respect to that Personal Information. Where permissible at law, your continued use of your account and the Sites (defined below) constitutes your agreement to this Privacy and Cookie Policy and any changes in an updated Privacy and Cookie Policy.

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PART 1: OVERVIEW

A. WHAT DO WE MEAN BY “PERSONAL INFORMATION”?

By “**Personal Information**,” we mean any information relating to you, where we have identified you or could identify you, or that may otherwise be defined as “personal information” by applicable law in your country of membership or residence.

Ways in which we could identify you include by: your name, an ID number linked to you, your location, an online identifier or factors specific to you. For example these might be physical factors (your body), physiology factors (your thoughts or feelings), genetic, mental, economic, cultural or social factors relating to you.

For example, a record in our system containing your membership number, name, address and whether or not you receive our newsletters, is your Personal Information.

B. HOW CAN YOU FIND WHAT YOU NEED IN 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(C) and you use any of our Sites as set out in Part 1(D).

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 or residence, 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 5. For feedback and queries please see Part 6.

C. TO WHOM DOES THIS PRIVACY AND COOKIE POLICY APPLY?

This Privacy and Cookie Policy applies to you if you are a:

- **website visitor** – someone who browses our Site but does not register or make a purchase
- **customer** – end consumers who purchase Isagenix products as individuals for their own personal use and acting for purposes which are wholly or mainly outside that individual’s trade, business, craft or profession.
- **associate** – someone who meets the requirements to become an “associate” as outlined in the Associate Terms and Conditions, and who chooses to participate in the Isagenix compensation plan.
- **brand partner** – someone who meet the requirements to become a “brand partner” as outlined in the Brand Partner Terms and Conditions, who shares links to purchase Isagenix products.
- **Mobile user** – a customer, associate 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 brand partners will be “members”.

D. TO WHICH SITES AND APPS DOES THIS PRIVACY AND COOKIE POLICY APPLY?

This Privacy and Cookie Policy applies to Personal Information collected on our public-facing websites, mobile sites 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 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.

E. WHEN MAY THIS PRIVACY AND COOKIE POLICY CHANGE?

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.

A. OUR IDENTITY AND CONTACT DETAILS

Here are our identity and contact details and, where applicable, those of our representative and data protection officer.

1. UNITED STATES (ISAGENIX WORLD HEADQUARTERS)

Isagenix International, LLC
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

Calls may 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

Compliance Enquiries: Compliance@isagenixcorp.com

Customer Support: Support@isagenixcorp.com

Data Subject Requests (where provided for by law): dataprivacy@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. Thank you.

2. UNITED KINGDOM

Isagenix (United Kingdom) Ltd (company number 09895521).

We are entered in the Information Commissioner's register of fee payers with registration number ZA189082.

Registered office address and trading address: 4th Floor, 100 Avebury Boulevard, Milton Keynes, United Kingdom, MK9 1FH.

Telephone: 0808 189 0490

Compliance Enquiries: ComplianceUK@isagenixcorp.com

Customer Support: CustomerServiceEU@isagenixcorp.com

Data Subject Requests: dataprivacy@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. Thank you.

3. AUSTRALIA

Isagenix (Asia Pacific) Australia Pty Ltd

Level 10, 2 Park Street

Sydney NSW 2000

Customer Service Australia:

1-300-651-979

Hours

Monday-Friday 8:00am-6:00pm (Australian Eastern Time)

Email

Compliance Enquiries: ComplianceANZ@IsagenixCorp.com

Customer Support: CustomerServiceANZ@IsagenixCorp.com

Event Enquiries: EventsANZ@IsagenixCorp.com

4. EUROPEAN UNION

Compliance Enquiries: ComplianceEU@isagenixcorp.com

Customer Support: CustomerServiceEU@isagenixcorp.com

Data Subject Requests: dataprivacy@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. Thank you.

To determine which Isagenix entity is the controller of your Personal Information, please review the following chart based on your country of residence.

Austria	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Belgium	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Cyprus	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Denmark	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Finland	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Germany	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Ireland	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Italy	Isagenix (Italia) S.R.L., c/o CTL Advisory S.r.l., Milan, Via Vincenzo Monti, 15-20123, Italy
Netherlands	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Poland	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Portugal	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Spain	Isagenix (Spain), S.L.U., Calle Atarazanas No. 2, planta 3. 29005, Malaga, Spain
Sweden	Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands

If your country of residence is not listed above and you live in the EU, the controller of your personal information is Isagenix (European Union) B.V., Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands.

5. NORWAY

Isagenix (European Union) B.V.
Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Telephone: 0808 189 0490
Compliance Enquiries: ComplianceEU@isagenixcorp.com
Customer Support: CustomerServiceEU@isagenixcorp.com
Data Subject Requests: dataprivacy@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. Thank you.

6. SWITZERLAND

Isagenix (European Union) B.V.
Herikerbergweg 88, 1101 CM Amsterdam, The Netherlands
Telephone: 0808 189 0490
Compliance Enquiries: ComplianceEU@isagenixcorp.com
Customer Support: CustomerServiceEU@isagenixcorp.com
Data Subject Requests: dataprivacy@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. Thank you.

7. NEW ZEALAND

Isagenix (Asia Pacific) New Zealand Limited
PO Box 321, North Ryde NSW, 1670, Australia
Customer Service Telephone: 0800-451-291
Hours
Monday-Friday: 8:00 a.m. – 6:00 p.m. (Australia Eastern Time)
Compliance Enquiries: ComplianceANZ@IsagenixCorp.com
Customer Support: CustomerServiceANZ@IsagenixCorp.com
Event Enquiries: EventsANZ@IsagenixCorp.com

8. CANADA

Isagenix Canada, ULC

Regus Purdy's Wharf, Suite 1700, Purdy's Wharf Tower 1, 1959 Upper Water Street, Halifax, N.S. Canada B3J 3N2

We will disclose the identity of the individual(s) designated to oversee Isagenix's compliance with PIPEDA's principles upon request. To make this request, we prefer you email us at Compliance@isagenixcorp.com and describe your request in the subject line of the email.

Customer Service Telephone: 1-877-877-8111 (toll free)

All calls will be recorded for quality purposes

Customer Care Hours: Mon-Fri: 6 a.m. to 6 p.m., Sat: 6 a.m. to 2:30 p.m., Sun: closed *

*Times displayed are Arizona: Mountain Standard Time (MST) year round. Arizona does not observe Daylight Savings Time.

Compliance Enquiries: Compliance@isagenixcorp.com

Customer Support: Support@isagenixcorp.com

9. MEXICO

Isagenix Mexico, S DE R.L. DE C.V.

Lafontaine #120, Col. Polanco Alcadia Miguel Hidalgo, Ciudad de Mexico, C.P. 11560

Telephone from Mexico City and Metropolitan area: 5029 6020

Telephone from the United States: 011 52 55 5029 6020

Call Center Hours

Mon-Fri: 9 am -7pm, Sat: 9 am -2pm Central Time

Email

Questions: serviciomx@isagenixcorp.com

B. OUR BUSINESS PURPOSES AND THE LEGAL BASIS FOR THEM

Where required by applicable data protection law, our processing of your Personal Information will be based on a legal justification. Here are our purposes and the legal basis for our use.

Our purpose	Legal basis
for direct marketing, such as email newsletters	Consent
for international transfers	Consent, standard contractual clauses, adequacy decisions, and/or data protection frameworks
to include photos in reports	consent or legitimate interests, depending on country requirements
to provide personalised recommendations	Consent or legitimate interests, depending on country requirements
to sell our companies or businesses, or part of them	Consent or legitimate interests, depending on country requirements
to administer contracts with members	Contract
to provide events and roadshows to members	Contract
to provide fulfilment, advertising or other services to other merchants or co-branded businesses (since we do not manufacture or produce certain items such as shirts, hats and bags)	Contract
To provide events and roadshows to members	Contract
to verify prospective associates' and brand partners' identities	Contract and legitimate interests
for internal group administration and administration of other relationships	legitimate interests
to analyse the effectiveness of our business activities	legitimate interests
to help detect and prevent manipulation, fraud, and violations of our policies, comply with applicable law, obey judicial orders, cooperate with law enforcement authorities, prevent any suspected illegal activities or report criminal or security threats to the proper authorities	legitimate interests

Our purpose	Legal basis
To maintain our accounts and records and keep our records up to date	Legitimate interests
To operate our sites	Legitimate interests
To otherwise conduct and improve our business and co-branded businesses	Legitimate interests
To promote and advertise our products and services	Legitimate interests
To provide contests, promotions, surveys	Legitimate interests
To provide rankings/tabulated statistics and event itinerary forms for associates	Legitimate interests
To respond to questions, complaints, or reviews of our product or services	Legitimate interests
To run diagnostics, for network and information security and system administration	Legitimate interests
To support and manage our associates and brand partners	Legitimate interests

Occasionally, the legal basis for our use may sometimes be so we can perform a legal obligation (such as respond to a court order), and very rarely, it may be necessary as a matter of life or death (vital interests) or in the public interest (public task).

C. OUR OWN AND OTHERS' LEGITIMATE INTERESTS

Our legitimate interests, and those of our merchants, co-branded businesses, associates, brand partners and suppliers, are to conduct business in accordance with legal commercial practice.

Please see the purposes Part 2(B) above for details.

D. RECIPIENTS OF PERSONAL INFORMATION

We do not sell or share your Personal Information with any third-parties for the purpose of cross-context behavioural advertising.

Sharing for business purposes. We may share your Personal Information for the business purposes described in Part 2(B) with:

- Business associates; for example:
 - o merchants and co-branded businesses (if you buy one of their products or services through our Site)
 - o associates and brand partners (who may receive limited information about other associates, brand partners, and customers)
 - o upline sponsors (who receive information about associates and brand partners 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 and enable them to run their businesses
 - If you give them your consent, your enrolling sponsor (and, if different, your placement sponsor) may use your personal information for their own marketing purposes
 - o Associates can run reports which may show names and membership numbers of people who are outside of their downline.
- Suppliers (for example service providers, please see ** below)
- Financial organisations
- Consultants and professional advisers
- Credit reference agencies
- Debt collection agencies
- Group companies
- A prospective purchaser of all or a part of our business

** We use other companies and individuals to perform certain functions on our behalf, namely 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. For a full list of recipients, please contact us.

Other disclosures. We may otherwise disclose Personal Information as permitted or required by applicable law, when we believe in good faith it is necessary for safety purposes, required for legal reporting, to protect our legal rights or enforce our contracts or any applicable rules, or to protect the rights of others. We may 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.

Whatever the purpose may be – whether we share with processors, 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 processors and service providers will not otherwise sell, retain, use, or disclose your personal information.

E. TRANSFERS OF PERSONAL INFORMATION

Our Sites are hosted in the US and your Personal Information will therefore be entered into servers at Isagenix International LLC's US-based data centres. Isagenix will use your Personal Information in accordance with this Privacy and Cookie Policy, including sharing it with Isagenix's authorised processors/service providers for business purposes, one of whom may be in Mexico.

Because of the way our direct selling model works, where members are all connected, your basic Personal Information (name and membership number) may be accessed from any country in which we operate (for example if you are an associate with an international sponsor who lives in another country).

Some countries we operate in have laws which are considered to give equivalent protection for privacy and other rights to those given by laws in the EEA and UK. For countries that do not have those equivalent laws, we have put appropriate safeguards in place between our group companies and with suppliers and associates.

F. STORAGE PERIOD

We store Personal Information for the retention period required to fulfil our legitimate business needs, comply with applicable law, resolve disputes, and enforce our agreements. Retention periods are determined by category of data and purpose (e.g. account data, tax records, marketing preferences) and disclosed upon request or in supplemental notices.

G. CHANGES TO OUR BUSINESS

The consent you provided herein to the use and sharing of your personal information by Isagenix or its affiliates shall also extend to any person or corporation to which Isagenix may transfer all or part of its business, or in the event of a merger, sale, or assignment of all or a portion of our assets or stock. We will require any such successor business entity to honor the terms of this Privacy Policy.

PART 3: YOUR RIGHTS

A. GENERAL RIGHTS

1. INFORMATION THAT YOU CAN ACCESS YOURSELF IF YOU ARE AN ASSOCIATE OR BRAND PARTNER

Examples of information associates and brand partners can access themselves in our systems include:

- up-to-date information about recent orders
- name, email, password, communications and personalised advertising preferences, address book
- payment settings, including credit-card information and gift voucher, gift card and cheque balances
- email notification settings, including Product Availability Alerts, Delivers, Special Occasion Reminders, and newsletters, and
- recommendations, including Recommended for You and Improve Your Recommendations.

2. 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 our customer support team directly (see Part 2(a)).

If you wish to de-activate your account, you may do so by contacting our customer support team at the appropriate email address for your country of residence based on Part 2(A). In the United States, you can send your request to 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.

3. WHAT CHOICES DO YOU HAVE ABOUT THE COLLECTION, USE, AND SHARING OF YOUR PERSONAL INFORMATION?

Part 3(B) describes the choices you may have about the collection, use, and sharing of your personal information depending on the region in which you live. You may also review your marketing preferences in your back office account to indicate which marketing communications you prefer to receive or opt out of all marketing communications. In some regions, you may also be able to opt out of certain cookies used on the Site as described in Part 5(C)

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.

B. COUNTRY-SPECIFIC RIGHTS

1. YOUR RIGHTS IN THE EUROPEAN UNION, EUROPEAN ECONOMIC AREA, AND THE UNITED KINGDOM

This section covers the EU, EEA and UK.

THE RELATIONSHIP BETWEEN ISAGENIX AND ITS MEMBERS

You are entitled to know how the relationship between Isagenix and its Members works.

Isagenix is a “controller” and associates and brand partners may also be “controllers” under European data protection law; that is they decide the “why” and “how” of their use of your Personal Information. Whether an Associate or Brand Partner is considered a “controller” or a “processor,” they are required to use your Personal Information in a way that is consistent with this Privacy and Cookie Policy.

The division of responsibilities between Isagenix on the one hand, and associates and brand partners on the other, is set out below.

Isagenix's responsibilities	Independent associates' and brand partners' responsibilities
Compliance of Isagenix's use of Personal Information of visitors, customers, and associates in its operation of the Site.	Compliance of the associate's or brand partner's use of Personal Information of customers and other associates provided by Isagenix. This includes information Isagenix provides by email, makes available in the associate's online account/back office (including through reports) and in Isagenix apps. It includes associates' or brand partners' use of tools provided by Isagenix to communicate with members or share Personal Information.
Compliance of Isagenix's use of Personal Information in the Site or other Isagenix systems ("Isagenix Systems").	Compliance of the associate's or brand partner's collection of Personal Information outside of Isagenix Systems. This includes collection through an independent website operated by the associate or brand partner, recorded by the associate or brand partner on or using a device, in notebooks, or using any other medium outside Isagenix Systems. Associates must also only market or enrol a customer or associate with that individual's full knowledge and written or other explicit consent.
Responding to queries, requests or complaints from individuals and other persons about Isagenix's use of Personal Information.	<ul style="list-style-type: none"> • Responding to queries, requests or complaints from individuals and other persons about the associate's or brand partner's use of Personal Information • Notifying Isagenix's data protection officer immediately if the associate or brand partner receives a request from an individual or anyone else about Isagenix's use of Personal Information.
Recording and reporting any personal data breaches involving Isagenix Systems to data protection authorities and affected individuals.	<ul style="list-style-type: none"> • Recording and reporting any personal data breaches outside of Isagenix Systems to data protection authorities and affected individuals • Notifying Isagenix's data protection officer immediately if they suspect their login credentials or any Isagenix System has been compromised
	Providing technical and organizational measures required to protect the Personal Information in accordance with Art. 32 GDPR. This includes, in particular, suitable measures for access, data carrier, storage, user, access, transmission, input, transport, order and availability control as well as suitable measures to ensure recoverability, reliability, data integrity and separate processing of data collected for different purposes (separation requirement).

Isagenix requires associates and brand partners to use your Personal Information in a manner consistent with this Privacy and Cookie Policy, the Independent Associate Terms and Conditions, Brand Partner Terms and Conditions, and all other Isagenix policies and procedures. However this Privacy and Cookie Policy applies to Isagenix's use of your Personal Information only; please contact associates and brand partners directly about their use. Please contact Isagenix using the contact details in Part 2(A) with any queries about Isagenix' use of Personal Information.

TO MAKE REQUESTS TO US

You have rights to make a request to us:

- for access to your Personal Information
- for rectification or erasure of your Personal Information
- for restriction of processing concerning you
- to object to our processing which is based on legitimate interests
- to object to direct marketing (including to object to related profiling if you are in the EEA/UK, or from the date such right is provided for under the laws of the country of your membership or residence)
- to port data you have provided to us, either to you or to another provider (if you are in the EEA/UK, or from the date such right is provided for under the laws of the country of your membership or residence).

If you are an associate or brand partner you can access some information yourself. Please see Part 3(A) above.

To exercise your rights, please contact us. Our contact details are in the “Identity and contact details” section in Part 2(A) above. We prefer that you exercise your rights by sending an email to dataprivacy@isagenixcorp.com, and list the name of the right being exercised in the subject field.

TO WITHDRAW CONSENT

You have a right to withdraw any consent you give us at any time.

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 in Part 2(A) above.

REGARDING AUTOMATED DECISION-MAKING

We generally do not use automated decision-making technology which produces legal effects or similarly significant effects, as that term is defined in State Privacy Laws. If we do intend to use automated decision-making technology, you will be informed through a separate privacy notice.

We do however undertake some basic marketing profiling. We undertake data analytics on purchases, downlines, and customers/associates to understand how we can improve our business model to enhance your interaction with us. We do not use profiling to automate decisions with legal effects, such as eligibility, compensation, or rankings.

We do not base profiling on special or sensitive categories of Personal Information, that is Personal Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning health, genetic data, or data concerning a natural person’s sex life or sexual orientation.

Meaningful information about the logic involved: we use certain categories of Personal Information described in Part 4(A) (namely the Personal Information listed under “customers, associates, and brand partners”, “website visitors” and “mobile users”) to create a profile. The source of this Personal Information is you or other sources (see Part 4(B) under “sources”). This Personal Information is directly relevant to improving our business model as set out above.

Significance and envisaged consequences for you: 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 customers, associates, and brand partners safe from fraudulent activity.

TO COMPLAIN

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 above that applies to your country of membership or residence. We will use reasonable efforts to respond to you as soon as possible.

In the EEA, you have the right to complaint to the appropriate supervisory authority, which you can find [here](#). In Germany, there are 16 state data protection authorities: you can find a list of them [here](#).

In the UK, you can complain to the UK Information Commissioner and you can find their contact details [here](#).

2. YOUR RIGHTS IN THE US

In general, the United States does not have a federal data privacy law affording rights to individuals related to their Personal Information. Individual states in the United States may have privacy laws affording rights to individuals related to their Personal Information. Residents of certain U.S. States may have rights to access, delete, correct, portability, and opt-out of targeted advertising or profiling. These rights vary by state. If you have questions about the privacy rights afforded in your state, please contact us by email at legal@isagenixcorp.com.

THE RELATIONSHIP BETWEEN ISAGENIX AND ITS MEMBERS

You are entitled to know how the relationship between Isagenix and its Members works.

Isagenix decides the “why” and “how” of its use of your Personal Information. Each state defines this role differently; in California, for example, Isagenix is a “business” under the California Consumer Privacy Act and subsequent privacy laws and regulations. Associates and brand partners may also jointly be considered a “business” or similar term under other state laws, to the extent they decide the “why” and “how” of their use of your Personal Information. “business” or a “service provider,” they are required to use your

Whether an Associate or Brand Partner is considered a “business” or a “service provider,” they are required to use your Personal Information in a way that is consistent with this Privacy and Cookie Policy.

The division of responsibilities between Isagenix on the one hand, and associates and brand partners on the other, is set out below.

Isagenix's responsibilities	Independent associates' and brand partners' responsibilities
Compliance of Isagenix's use of Personal Information of visitors, customers and associates in its operation of the Site.	Compliance of the associate's or brand partner's use of Personal Information of customers and other associates provided by Isagenix. This includes information Isagenix provides by email, makes available in the associate's online account/back office (including through reports) and in Isagenix apps. It includes associates' or brand partners' use of tools provided by Isagenix to communicate with members or share Personal Information.
Compliance of Isagenix's use of Personal Information in the Site or other Isagenix systems (“Isagenix Systems”).	Compliance of the associate's or brand partner's collection of Personal Information outside of Isagenix Systems. This includes collection through an independent website operated by the associate or brand partner, recorded by the associate or brand partner on or using a device, in notebooks, or using any other medium outside Isagenix Systems. Associates must also only market or enrol a customer or associate with that individual's full knowledge and written or other explicit consent.
Responding to queries, requests or complaints from individuals and other persons about Isagenix's use of Personal Information.	<ul style="list-style-type: none"> • Responding to queries, requests or complaints from individuals and other persons about the associate's or brand partner's use of Personal Information • Notifying Isagenix's data protection officer immediately if the associate or brand partner receives a request from an individual or anyone else about Isagenix's use of Personal Information.
Recording and reporting any personal data breaches involving Isagenix Systems to data protection authorities and affected individuals.	<ul style="list-style-type: none"> • Recording and reporting any personal data breaches outside of Isagenix Systems to data protection authorities and affected individuals • Notifying Isagenix's data protection officer immediately if they suspect their login credentials or any Isagenix System has been compromised
	Providing technical and organizational measures required to protect the Personal Information in accordance with Art. 32 GDPR. This includes, in particular, suitable measures for access, data carrier, storage, user, access, transmission, input, transport, order and availability control as well as suitable measures to ensure recoverability, reliability, data integrity and separate processing of data collected for different purposes (separation requirement).

Isagenix requires associates and brand partners to use your Personal Information in a manner consistent with this Privacy and Cookie Policy, the Independent Associate Terms and Conditions, Brand Partner Terms, and all other Isagenix policies and procedures.

However this Privacy and Cookie Policy applies to Isagenix's use of your Personal Information only; please contact associates and brand partners directly about their use. Please contact Isagenix using the contact details in Part 2(A) with any queries about Isagenix' use of Personal Information.

SPECIFIC STATE RIGHTS (CALIFORNIA, COLORADO, CONNECTICUT, UTAH, AND VIRGINIA)

If you are a resident of California, Colorado, Connecticut, Utah, or Virginia, you have certain rights to make a request to us:

- for disclosure of the categories of Personal Information we have collected about you, the sources from which your Personal Information was collected, the business purpose for collecting, selling, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you.
- 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.
- for deletion of your Personal Information, subject to certain exceptions.
- for correction of your inaccurate Personal Information
- for access to information about, or to opt out of, our use of automated decision-making technology to include meaningful information about the logic involved in those decision-making processes, as well as a description of the likely outcome of the process with respect to you. Part 3(B)(1) contains a description of our current use of automated decision-making technology.
- To limit the use and disclosure of sensitive personal information. (See Part 4(C) for a description of the limited sensitive personal information we may gather and the purposes for which we may use it.)
- To opt out of sharing personal information with third parties for targeting advertising. (Please note that we do not sell or share personal information with third parties for direct marketing purposes)

To make any of these requests, please contact us at dataprivacy@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 consumer because you exercise any of these rights.

See Part 4 below for categories of Personal Information Isagenix;

- Collects about consumers; and
- May disclose about consumers for a business purpose

We do not sell or share personal information that we have collected. We have not sold or shared consumers' personal information in the preceding 12 months.

Subject to certain limits under applicable law, if you are a California resident, you may make a request to us:

- 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.
- Opt out of automated systems to make or materially inform significant decisions. (Generally, we do not use automated decision-making with legal effects)

You may submit requests to us under California Civil Code § 1798.83 by sending an email to dataprivacy@isagenixcorp.com or calling us toll-free at **877-877-8111**.

3. YOUR RIGHTS IN AUSTRALIA AND NEW ZEALAND

AUSTRALIA

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.

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 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.

NEW ZEALAND

This Privacy and Cookie Policy recognises its responsibilities in relation to the collection, use, and disclosure of Personal Information under the Privacy Act 2020. 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.

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 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 Privacy Commissioner ("OPC"). Details of how to contact the OPC are located at <https://www.privacy.org.nz/>.

4. YOUR RIGHTS IN CANADA

Pursuant to the Personal Information Protection and Electronic Documents Act ("PIPEDA"), you have the right to be informed of the existence, use, and disclosure of your Personal Information and to challenge the accuracy and completeness of the information and have it amended as appropriate. Certain provinces, including Quebec, provide additional rights such as advance notice of automated decision making and enhanced consent requirements.

If you make a request of us to access your Personal Information, you may be required to provide sufficient information to permit us to verify your identity.

To make a request pursuant to PIPEDA, you may email us at dataprivacy@isagenixcorp.com or call us at **1-877-877-8111**.

5. YOUR RIGHTS IN MEXICO

Pursuant to the Federal Law on Protection of Personal Data Held by Individuals, you have the right to make a request of us to:

- Access your Personal Information held by us
- Rectify your Personal Information if it is inaccurate or incomplete

- Cancel your Personal Information
- Object to the processing of your Personal Information

To make any of these requests, please contact us at dataprivacy@isagenixcorp.com or toll-free at **877-877-8111**. Please provide the following information with your request: (I) your name, address, and contact information; (II) documents establishing your identity; (III) A clear description of your Personal Information and the right you want to exercise; and (IV) any other item or document that facilitates locating your Personal Information. For your protection, we may need to verify your identity before fulfilling your request.

See Part 4 below for categories of Personal Information Isagenix:

- Collects about consumers; and
- May disclose about consumers for a business purpose.

PART 4. PERSONAL INFORMATION WE COLLECT

When you interact with us, we are collecting Personal Information about you. Sometimes we collect personal data automatically when you interact with our website and, sometimes, we collect the personal data directly from you. At times, we may collect personal data about you from other sources and third parties, even before our first direct interaction. We may link or combine your activities and information collected from you on our websites with information we receive from third parties, as well as information we collect automatically through tracking technologies (defined below). This allows us to provide you with a personalized experience regardless of how you interact with us.

WHEN WE COLLECT INFORMATION DIRECTLY

We collect Personal Information you voluntarily provide to us or which is collected through cookies or similar technologies (please see below and Part 5). 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, contests, or surveys
- Submit comments, reviews, or other user-generated content
- Connect or interact with us through social networks (e.g., Facebook, TikTok, Instagram), and
- Request customer or technical support.

This Personal Information, for example, may include your:

- **Contact, Account and Profile Information.** We collect personal data, such as your name, email address, password, telephone number, gender, zip code, and address when you create an account, sign up for a newsletter, request a transaction or make a purchase online or in-store, redeem or participate in a promotion, or otherwise communicate with us. We collect any communications between you and us and any other information you provide to us. We also collect information about your use of our website, such as your orders, and similar activity.
- **Payment and Transaction Information.** We may collect information when you make a purchase or request a transaction online, such as items purchased, date and time of your transaction, amount purchased, order details, whether you used a particular coupon or deal, and payment information, such as your credit/debit card. Please note that we use third party payment processors to process credit card payments made to us. We also use third party payment plan providers to offer you additional payment options. As such, we do not retain any personally identifiable financial information in connection with credit card payments, such as credit card numbers. Rather, all such information is provided directly by you to our third-party processor. These third parties' use of your personal data is governed by their privacy notice.
- **Commercial Information and Shopping History.** We may collect information about your transactions online, including what products you purchased or returned, items viewed on the website or added to your cart, and product preferences.

INFORMATION THAT IT'S NECESSARY FOR US TO COLLECT AND WHAT HAPPENS IF YOU DON'T PROVIDE IT

Some of the Personal Information we collect is required for our contract with you:

- We will collect your name, email, and contact information when you purchase products or services from us. This is necessary to process transactions and fulfil your requests. We collect additional information about your identity, such as unique tax ID numbers and direct deposit banking details, when you enrol as an associate or brand partner. This is to verify your identity and pay you any earned compensation.
- Photos and some physical data, such as height or weight, may be collected if an associate, brand partner, or preferred customer joins a fitness challenge, such as Kickstart 90. This is a necessary requirement of participation in the challenge; you are free not to participate if you would rather not provide that information. We do not use this data for the purpose of uniquely identifying consumers.

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, products or services you have requested.

INFORMATION WE COLLECT ON CUSTOMERS, BRAND PARTNERS, AND ASSOCIATES

When you visit our website, we collect your personal data automatically to help us provide products and services more relevant to you. This includes:

- Information about how you use and interact with our websites and services, including browsing and purchase history, any content you post to our website, and search history;
- Information about how you access and use our website, including the site from which you came, the pages on our site you visit, the links you click, whether you open emails from us or click the links contained in emails, whether you access our website from multiple devices, and the actions you take on our website.
- Analytics data, which includes the electronic path you take to our services, through our services and when exiting our services, as well as your usage and activity on our services, such as the links and objects you view, click or otherwise interact with. We may collect analytics data or use third-party analytics tools to help us measure traffic and usage trends for the services and to understand more about the demographics of our users.
- Information about your location, such as the location of your device.

We also collect information from other sources (please see section b below), including in connection with offering joint or co-branded products and services.

INFORMATION WE COLLECT THROUGH TECHNOLOGY

We obtain information 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 members.

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, 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. If you buy a product on our Site, we will collect payment card information from you, including your name, expiration date, authentication code, and billing address. We will securely transmit this information consistent with payment card industry rules to the appropriate payment facilitators. We may offer you the option to save information about the method and choice of payment on our Site. If you save this payment card information on our Site, you will be able to add, delete, or modify that information at any time using your account settings.

INFORMATION WE COLLECT AUTOMATICALLY ON ALL WEBSITE VISITORS

We obtain information on all users that visit our website. We do this to display our website properly in the region it is accessed. This information may include:

- the Internet protocol (IP) address used to connect your computer/mobile device to the Internet
- computer and connection information such as
 - o browser type and version
 - o time zone setting
 - o browser plug-in types and versions
 - o operating system
 - o the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time)
 - o products you viewed or searched for
- browser data such as cookies (please see Part 5)

- session information collected via software tools such as JavaScript including
 - o page response times
 - o download errors
 - o 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.

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 “device information” in the “information we collect using technology” section above.

INFORMATION WE COLLECT WHEN 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. For example we create custom audiences for our ads on Facebook and Google. To understand how our advertising campaigns are performing, we may collect certain information via our Sites through our advertising and service providers. We or our providers 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 that appear as you log-in or off of your online accounts via our Sites
- Identify new visitors to our Sites
- Track referrals for enrolments and commissions
- 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. We recognize and process certain universal opt-out preference signals when required by law.

For more information about our advertising processors and service providers and their cookies, including information about how to opt out of these technologies, you may visit www.aboutads.info/choices. In addition, users may prevent your data from being used by Google Analytics by downloading and installing a browser add-on available at <https://tools.google.com/dlpage/gaoptout>. Please also see Part 5 (cookies) for further information.

B. PERSONAL INFORMATION COLLECTED FROM OTHER SOURCES

We may also obtain Personal Information from other sources, which we often combine with personal data we collect either automatically or directly from you. We receive the same type of data described above from the following sources and third parties:

- Delivery Information. We may receive 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
- Verification Information: We may obtain information from third-party providers, which we use to authenticate your account, verify your identity, and help prevent and detect fraud;
- Enrolment Information: We may obtain Personal Information about you from another associate who enrolls you as an associate or Brand Partner (if you do this yourself, you are required to obtain the other person’s prior consent). We may also obtain your name, address and phone number, if an associate or brand partner sends you one of our products (e.g. as a gift).

C. SENSITIVE PERSONAL INFORMATION

Generally, we do not collect sensitive (that is, special categories of) Personal Information (“Sensitive Personal Information”) about consumers.

In the United States, we collect social security numbers (SSNs) or Employer Identification Numbers (EINs) for all associates and brand partners. In other jurisdictions, we may collect similar unique tax identifiers or ID numbers. We collect this information for tax and accounting purposes, including to track parties and payments and to report to governing agencies. We also collect this information to verify your identity and prevent associates, brand partners, or customers from creating duplicate accounts.

We collect dates of birth to verify eligibility to participate as an associate, or brand partner.

Likewise, photos and biometric data (for example before and after photos) will be collected if an associate, brand partner, or preferred customer joins a fitness challenge or Kickstart 90 challenge. We do not use biometric data for the purpose of uniquely identifying consumers.

Our use of Sensitive Personal Information is limited to uses that are necessary to perform the services or provide the goods reasonably expected by an average consumer. Any further limitation on our uses of Sensitive Personal Information may prevent us from providing you with requested goods or services or operating our business in a lawful manner.

WE DO NOT SELL OR SHARE SENSITIVE PERSONAL INFORMATION WITH ANY THIRD PARTIES.

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. It helps us improve your overall experience.

B. WHAT COOKIES DO WE USE?

We use these types of cookie for these purposes
<p>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.</p>	<p>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. To determine referrals for customers arriving at our site and serve up the appropriate shopping flow and context.</p>
<p>Performance cookies. These cookies are used for performance and to improve the Site.</p>	<p>To count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous.</p>
<p>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.</p>	<p>To remember settings and preferences; 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.</p>
<p>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.</p>	<p>With similar technologies, to make the advertisements you see online or in your email more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research. We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you and others on such platforms.</p>

C. HOW TO SEE COOKIES AND GIVE/WITHDRAW CONSENT TO COOKIES AND SIMILAR TECHNOLOGIES

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 are visible through your browser.

To give or withdraw consent to cookies, use the One Trust cookie consent tool on our home page if one is available in your region. If the cookie banner does not pop up immediately when visiting our webpage, you can scroll to the bottom and click the green cookie logo to access it. You may also be able to adjust cookie settings with your browser.

If you 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 query.

LOCAL AND SESSION STORAGE

You can delete local storage, session storage and database storage by adjusting your browser settings.

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. If you have an iOS device, Apple may, depending on your country of residence and device, automatically block all tracking of email opens and clicks on links within emails.

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

D. 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/>. For more information about cookie notices and cookie consent, please see <https://cookiepedia.co.uk/giving-consent-to-cookies>.

You can also use privacy-friendly search engines, privacy-friendly browsers and/or privacy add-ons to some browsers to help block tracking requests generally. Search online for the options to see what works best for you.

PART 6. 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 2(A) above.