

DATA PROTECTION NOTICE

1. YOUR PERSONAL DATA COLLECTED & OBTAINED

This Data Protection Notice ("**Notice**") sets out the basis on which It Works! Marketing International UC ("**It Works!**", "**we**" or "**us**") of 45-46 James Place East, Dublin 2, Ireland uses the personal data detailed below ("**Personal Data**") we collect from you or that you provide to us through our website or an It Works! Independent Distributor. The information provided by you will be held by us as a data controller.

Personal Data	Your name, date of birth, email address, billing and shipping addresses, phone number, tax identification number, gender, photo, payment information, details of your purchases, social networking sites, Internet protocol (IP) address, and browser data from the It Works! Website.
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2. HOW & WHY WE PROCESS YOUR PERSONAL DATA

The following tables detail how ("**Legal Basis**") and why ("**Purposes**") we process your Personal Data. We also set out who we may transfer your Personal Data to ("**Recipients**") and the period that your Personal Data will be stored for ("**Retention**").

NECESSARY FOR ENTERING INTO OR PERFORMANCE OF A CONTRACT	
Legal Basis	It is necessary to process your Personal Data to enter into and perform our contract with you.
Purposes	<p>We obtain, collect, and process your Personal Data for the following purposes:</p> <ul style="list-style-type: none"> To process your application to become an It Works! Independent Distributor; To process your application to become an It Works! Customer; To create and manage your account; To fulfil orders for products which you have submitted either as a Distributor or Customer; To process payment for purchases or other services for or on your behalf; To enforce our Distributor or Customer Agreement and otherwise manage our relationship with you, as applicable; To conduct searches to verify your identity; To deliver and organise your orders; To notify you about changes to the It Works! Site and/or services.
Recipients	Your Personal Data will be disclosed to other members of the It Works! Sales organization, including but not limited to any of its affiliates and/or subsidiaries, and service providers engaged by It Works! to fulfil your contract with It Works!. We only share your Personal Data with third party service providers, including warehousing providers, distribution/delivery service providers, payment service providers, and cloud service providers, with whom we have entered into a Data Processing Agreement or have established that their data protection policies and procedures comply with all laws and regulations.
Retention	We will retain information collected under this legal basis for the length of contract plus seven (7) years. However, we may be required by applicable laws and/or regulations to hold your Personal Data longer than this period.

IMPORTANT	You are obliged to provide us with your Personal Data as it is necessary to enter into a contract with us. The consequences for not doing so are that your application to become an It Works! Independent Distributor or an It Works! Customer will be refused and/or any purchase of It Works! products or services made by you will not be fulfilled.
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COMPLIANCE WITH A LEGAL OBLIGATION	
Legal Basis	It is necessary to process your Personal Data in order to comply with the legal obligations which apply to us.
Purposes	<p>We obtain, collect, and process your Personal Data in order to comply with the following legal obligations:</p> <ul style="list-style-type: none"> • To comply with the It Works! Distributor and Customer Agreements, as applicable; • To calculate, process, and send commission payments, bonuses, and awards; • To send general correspondence relating to your contract or relationship with It Works!; • To comply with our contractual relationship with you; • To meet any applicable government or regulatory requirements.
Recipients	Your Personal Data will be disclosed to governmental, regulatory, and tax authorities as required.
Retention	We will retain information collected under this legal basis for the length of our business relationship plus seven (7) years. However, we may be required by applicable laws and/or regulations to hold your Personal Data longer than this period.

CONSENT	
Legal Basis	When you freely and voluntarily give us your Personal Data for the Purpose below, you consent to our processing of your Personal Data.
Purposes	We obtain, collect, and process your Personal Data to register and provide you with information, products, or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes; to notify you about changes to the It Works! Site and/or services; and to send you marketing communications about our products, offers, and promotions.
Recipients	We do share your Personal Data with other members of the It Works! Sales organization, including but not limited to any of its affiliates and/or subsidiaries. We do not share your Personal Data with marketers outside of It Works!.
Retention	We will retain your marketing communications consent for as long as you remain a Distributor or Customer of It Works! and thereafter as permitted in accordance with local data protection rules, unless you withdraw your consent for us to provide you with marketing information.
IMPORTANT	You may withdraw consent for us to process your Personal Data at any time. However, please note that any processing carried out before you withdraw your consent will remain valid.

LEGITIMATE INTEREST	
Legal Basis	We have a legitimate interest to process your Personal Data.
Purposes	<p>We obtain, collect, and process your Personal Data for the following purposes:</p> <ul style="list-style-type: none"> • To manage our sites and services so that we can continue to provide you with opportunities as you engage in your It Works! business; • To provide services to help you better serve your Customers; • To protect against or identify possible fraudulent transactions; • To develop and provide product information, advertising, and business tools; • To analyze the use of our products, services, and sites; • To understand how you are utilizing business tools offered by us, including personal websites and other e-commerce tools; • To determine the effectiveness of our advertising and promotions.
Recipients	We only share your Personal Data with third party service providers, including warehousing providers, distribution/delivery service providers, payment service providers, and cloud service providers, with whom we have entered into a Data Processing Agreement or have established that their data protection policies and procedures comply with all laws and regulations.
Retention	We will retain information collected no longer than is necessary to fulfil the purposes for which it was collected. However, we may be required by applicable laws and/or regulations to hold your Personal Data longer than this period.

3. TRANSFERS OF YOUR PERSONAL DATA

Your Personal Data may be stored and transferred inside or outside the European Economic Area ("EEA"). We only transfer your Personal Data where the EU Commission has decided that the third country in question ensures an adequate level of protection in line with EU data protection standards **OR** there are appropriate safeguards in place to protect your Personal Data. If you would like to find out more about the appropriate safeguards that we have in place to govern the transfer of your Personal Data you can contact us at privacy@itworks.com.

4. HOW LONG WE KEEP YOUR PERSONAL DATA FOR

We may keep your Personal Data for the periods specified in Section 2, above.

5. YOUR RIGHTS

The table below sets out your rights to address any concerns or queries about our processing of your Personal Data:

Right	Further Information
Right of Access	You have the right to request a copy of your Personal Data. We will only charge you for making such an access request where we feel your request is unjustified or excessive.
Right to Rectification	You have the right to request that we amend any inaccurate Personal Data that we have about you.
Right to Erasure	<p>You have the right to ask us to erase your Personal Data where:</p> <ol style="list-style-type: none"> 1. Your Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed by

	<p>us;</p> <ol style="list-style-type: none"> 2. You withdraw your consent and no other legal ground permits us to process your Personal Data; 3. You object to the processing and there are no overriding legitimate grounds for the processing; 4. Your Personal Data has been unlawfully processed; or 5. Your Personal Data must be erased in order to comply with a legal obligation. <p>We may not be able to comply with a request where we require your Personal Data for compliance with a legal obligation or in connection with legal proceedings or for exercising the right of freedom of expression and information.</p>
<p>Right to Restriction of Processing</p>	<p>You have the right to ask us to restrict processing your Personal Data in the following situations:</p> <ol style="list-style-type: none"> 1. Where you contest the accuracy of your Personal Data; 2. Where the processing is unlawful and you do not want us to delete your Personal Data; 3. Where we no longer need your Personal Data for the purposes of processing but you require the data in relation to a legal claim; or 4. Where you have objected to our processing of your Personal Data pending the verification of whether our legitimate business interests override your interests, rights, and freedoms or in connection with legal proceedings. <p>When you exercise this right, we may only store your Personal Data. We may not further process the data unless you consent or the processing is necessary in relation to a legal claim or to protect the rights of another person or legal person or for reasons of important public interest. We will inform you before the processing restriction is lifted.</p>
<p>Right to Data Portability</p>	<p>You may request us to provide you with your Personal Data which you have given us in a structured, commonly used and machine-readable format, and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible.</p> <p>This right only arises where:</p> <ol style="list-style-type: none"> 1. We process your Personal Data on your consent or where it is necessary to perform our contract with you; and 2. The processing is carried out by automated means.
<p>Right to Object</p>	<p>You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.</p> <p>You have a right to object at any time to the processing of your Personal Data for direct marketing purposes.</p>
<p>Right to Object to Automated Decision-Making, including Profiling</p>	<p>You have a right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.</p> <p>We may not be able to comply with this request where the processing</p>

	is necessary to enter or perform our contract with you or where you explicitly consent to this. However, you are entitled to have a person from our team review the decision so that you can query it and set out your point of view to us.
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You can exercise any of these rights by submitting a request to privacy@itworks.com.

We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay and at the latest within one month of receiving your request. We may extend this up to two (2) months if necessary due to the specific circumstances of the request. However, we will inform you if this situation arises.

You have the right to lodge a complaint with the Office of the Data Protection Commissioner with regards to us processing your Personal Data by contacting the Office of the Data Protection Commissioner.

6. CHANGES TO THIS NOTICE

We may amend this Notice on occasion, in whole or part, at our sole discretion. Any changes will be effective immediately upon notice to you.

If at any time we decide to use your Personal Data in a manner significantly different from that stated in this Notice, or otherwise disclosed to you at the time it was collected, we will notify you, and you will have a choice as to whether we use your Personal Data in the new manner.

Questions, comments and requests regarding this Data Protection Notice are welcomed and should be addressed to privacy@itworks.com.

MAY 2018