

IT WORKS! MARKETING INTERNATIONAL UC PRIVACY STATEMENT

1. WHAT IS A PRIVACY STATEMENT?

1.1 The www.itworkseu.com website (the “**Site**”) is operated by It Works! Marketing International UC of 45-46 James Place East, Dublin 2, Ireland (hereafter “**we**”, “**us**”, “**our**”, “**It Works!**”). This Privacy Statement (“**Statement**”) together with the Site Terms and Conditions of Use (“**Terms**”) and Cookies Policy sets out the basis on which any information or personal data we collect from users, or that you provide to us, will be processed by the Site. This Statement applies to the Site and all products and services offered by It Works! The information provided by you will be held by us as a data controller.

1.2 The following discloses our information gathering and dissemination practices relating to the Site. In order to fully understand your rights, we encourage you to read this Statement and to consult our Terms. Each time you use the Site you will be bound by the then current Statement and you should review this each time you use the Site.

2. ACCEPTANCE OF THIS STATEMENT

2.1 By using the Site, you signify acceptance of this Statement. If you do not agree with or you are not comfortable with any aspect of the Statement, your only remedy is to discontinue use of the Site. We reserve the right to modify this Statement at any time. Your continued use of any portion of the Site following notification or posting of such changes will constitute your acceptance of those changes.

3. YOUR PERSONAL DATA

3.1 We will collect and process the following Personal Data from you:

Category of Data	Information Collected and Processed	Legal Basis (See Section 4 below)
Browsing Information	<p>When using the Site or availing of services related to the Site, personal information will be collected from you by Google Analytics and by It Works!. This includes:</p> <ul style="list-style-type: none"> • Automatically Collected Information: Some non-personal data is automatically received and sometimes collected from you when you visit the Site. We receive and collect the name of the domain and host from which you access the Internet; the Internet protocol (IP) address of the computer you are using; the browser software you use and your operating system; the date and time you access the Site; and the Internet address of the website from which you linked directly to the Site. We use this information to monitor the usage of the Site. Also, when we send emails to you, we may be able to identify information about your email address, such as whether you can read graphic-rich HTML emails. All of the information we automatically capture provides us with the ability to enhance our customers’ search and shopping experiences and to determine aggregate information about our user base and usage patterns. 	Legitimate Interest

	<ul style="list-style-type: none"> • Information Collected via Cookies: For the same reason as we collect and process Automatically Collected Information, we use cookies to deliver a better and more personalised browsing and shopping experience on the Site. For more information, please see our Cookies Policy. 	Legitimate Interest
	<ul style="list-style-type: none"> • Information Collected Using Pixel Tags or Clear GIFs: To help us understand the effectiveness of certain of our email marketing efforts, It Works! may use “message format” and “message open” sensing technologies. Both technologies require the use of pixel tags or clear GIFs (also called web beacons). The “message format” sensing technology allows us to recognize whether you have enabled your email program to receive HTML emails; if so, this information is then associated with your email address so that subsequent messages can be sent to you in HTML format. The “message open” sensing technology allows us to recognize whether you have opened our email message. We can only detect this if you have enabled your email program to receive HTML emails. 	Legitimate Interest
	<ul style="list-style-type: none"> • Information You Actively Submit to It Works!: For most of the browsing services we provide, we neither require nor collect “Personal Customer Information” – name, email address, billing address, shipping address, phone number and credit card information. You can browse the Site and take as much time as you want to view our products and services without having to submit such Personal Customer Information. Even when you use our shopping cart as you browse, there is no need to submit Personal Customer Information. In the following instances, however, we do need you to actively submit Personal Customer Information: (i) when you want to become an independent distributor (“Distributor”), (ii) to open a Customer account; or (iii) complete a retail order. 	Legitimate Interest

3.2 You can choose to provide us with the following Personal Data:

When you use the Site, we receive and collect certain information and personal data about you, known as “**Personal Customer Information**”. The Personal Customer Information we receive and collect depends on what you do when you visit the Site. We may collect and process the following Personal Customer Information about you:

Category of Data	Information Collected and Processed	Legal Basis (See Section 4 below)
Information You Provide	<ul style="list-style-type: none"> • Information that you provide to us when registering and subsequently using the Site, availing of our services or purchasing our products, such as name, birthdate, email address, billing address, shipping address, phone number and credit card information. If you choose to correspond with us through the Site, we will keep a record of this correspondence for as long as is necessary to deal with this query. Please see our section on <u>How Long We Keep Your Data</u> for further information on how long we retain this information. 	Contract or Consent

	<ul style="list-style-type: none"> We may also ask you to complete surveys from time to time that we use for research purposes, although you do not have to respond to them. 	Legitimate Interest
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4. HOW & WHY WE USE YOUR PERSONAL DATA

4.1 The following table details the legal basis for (the "**Legal Basis**") and the reasons why ("**Purposes**") we process your Personal Data:

Legal Basis	Purpose(s)
<p>Contract It is necessary to process this Personal Data to enter into and perform our contract with you regarding your use of the Site as set out in the <u>Terms</u></p>	<p>Access to the Website</p> <ul style="list-style-type: none"> To provide you with access to the Site and to allow you to use the Site. <p>Fulfilling your Orders and Requests</p> <ul style="list-style-type: none"> To provide you with information, products or services that you request from us and to fulfil orders placed through the Site.
<p>Consent</p>	<p>Marketing</p> <ul style="list-style-type: none"> To provide you with information relating to It Works! products or services where you have consented to receive such marketing or are an existing customer and/or information related to third party products or services where you have consented to receive such marketing.
<p>Legitimate Interests It is necessary for the purpose of our legitimate interests to collect and process this Personal Data for the purposes of improving and monitoring website efficiency and enhancing your use of the Site.</p> <p>It is also necessary for the purposes of our legitimate interests to process your Personal Data to respond to any queries or requests submitted by you regarding the Site.</p>	<p>Improving Website Functionality & Efficiency</p> <ul style="list-style-type: none"> To provide, improve, test and monitor the effectiveness of the Site To monitor metrics such as total number of visitors, traffic data and demographic patterns. To ensure the content on the Site is presented in the most effective manner for you and your device. <p>Responding to Queries</p> <ul style="list-style-type: none"> To process and respond to any enquiries or requests you submit to us via the Site. To seek your views on the Site and our services. To provide you with information on services offered by us, our partners or our advertisers which may be of interest to you. <p>Notify You to Changes To notify you about changes to the Site and/or services.</p>

5. WHO WE SHARE YOUR PERSONAL DATA WITH

5.1 We will disclose your Personal Data to other members of our group which means our subsidiaries, our ultimate holding company and its subsidiaries (the "**It Works! Group**") who provide aspects of the services and products provided through the Site.

5.2 We will only disclose your personal information to third parties outside the It Works! Group in the following circumstances:

Recipient(s)	Purpose(s)
Prospective Sellers of Buyers of Business Assets	<ul style="list-style-type: none"> To facilitate the acquisition of It Works! by a third party. To facilitate the acquisition of a significant portion or substantially all of It Works!' assets by a third party.
Third Party Companies	<ul style="list-style-type: none"> To assist It Works! in providing the services and products offered through the Site.
Regulatory Authorities, Law Enforcement Agencies, Public Bodies and Third Party Companies	<ul style="list-style-type: none"> To comply with any applicable legal obligation, court order, summons, search warrants, or any other legal or regulatory obligation or request to which It Works! is subject. To protect the rights, property or safety of It Works!, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
Regulatory Authorities, Law Enforcement Agencies, Public Bodies and Third Party Companies	<ul style="list-style-type: none"> To enforce or apply the Terms and other agreements or to investigate potential breaches.

6. STORING OF AND TRANSFERS OF YOUR PERSONAL DATA

6.1 Your Personal Data may be stored and transferred inside or outside the European Economic Area ("**EEA**"), including storage on the Rackspace and Azure infrastructures and applications services in the USA, and all other countries in which we do business. 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.

6.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will always do our best to protect your personal data, we cannot guarantee the security of any information you transmit to us; any transmission is at your own risk. Once we have received your information, we will endeavour to use strict procedures and security features to try to prevent unauthorised access.

7. LINKS

7.1 The Site may contain links to other websites ("**Linked Websites**"). It Works! is not responsible for the privacy statements or practices on the Linked Websites. This Statement governs only information collected on the Site. When accessing Linked Websites, you should read the privacy statement published on the relevant Linked Website. The Terms of our Statement do not apply to Linked Websites. Please check these statements before you submit any Personal Data to Linked Websites.

7.2 The Site contains links to other sites and resources provided by third parties for your convenience and information only. We accept no liability in connection with any Linked Website, or any contract entered into or through a Linked Website. We have no control over the contents of those sites or resources, and accept no responsibility for them or for any loss or damage that may arise from your use of Linked Websites.

8. HOW LONG WE KEEP YOUR PERSONAL DATA

In general, we expect to keep your Personal Data no longer than is necessary to fulfil the purposes for which it was collected or, where you enter into a contractual arrangement with us, following the end of

the performance of our contract or your termination as an It Works! Independent Distributor or Customer.

Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably expect or require us to preserve your data.

9. YOUR RIGHTS AND HOW TO EXERCISE THEM

9.1 The table below sets out your rights to address any concerns or queries with us 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 us; 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>
Right to Restriction of Processing	<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 or not 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>
Right to Data Portability	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>This right only arises where:</p> <p>(1) We process your Personal Data on your consent or where it is necessary to perform our contract with you; and</p> <p>(2) The processing is carried out by automated means.</p>
Right to Object	<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>
Right to Object to Automated Decision-Making, including Profiling	<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 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 to review the decision so that you can query it and set out your point of view to us.</p>

9.2 You can exercise any of these rights by submitting a request to privacy@itworks.com.

9.3 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 (1) 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 arises.

9.4 You have the right to lodge a complaint with the Data Protection Commission with regards to us processing your Personal Data by contacting the Data Protection Commission.

10. CHANGES TO THIS STATEMENT

10.1 If we amend this Statement, in whole or part, any changes will be posted on this page and, where appropriate, notified to you by email or when you use the Site. The new Statement may be displayed on-screen and you may be required to read and accept it to continue your use of the Site.

10.2 If at any time we decide to use your Personal Data in a manner significantly different from that stated in this Statement, or otherwise disclosed to you at the time it was collected, we will notify you, and you will have a choice as to whether or not we use your Personal Data in the new manner.

Questions, comments and requests regarding this Privacy Statement are welcomed and should be addressed to privacy@itworks.com.

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