



Welcome to It Works Marketing, Inc. ("It Works!", "we", "us", or "our")

### **It Works! Privacy Policy**

Our Privacy Policy explains how we and some of the companies we work with collect, use, share and protect information in relation to our website, services, mobile services, and any software provided on or in connection with It Works! services (collectively, the "**Service**"), and your choices about the collection and use of your information.

Our Policy applies to all visitors, users, and others ("Users") who access the Service.

- 1. When you use our Service, we receive and collect certain information. The information that we receive and collect depends on what you do when you visit It Works!. In general, we collect the following personal data: name, address, telephone number, e-mail address, username, credit card information and tax identification number.**

#### **We use this data:**

To answer your questions;

To deliver and organize your orders;

If you are an It Works! Distributor or Customer and have opted-in for email communication, we send you our product information and newsletter via email.

- a. Automatically Collected Information.** Some non-personal information is automatically received and sometimes collected from you when you use our Service. 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 our Site; and the Internet address of the web site from which you linked directly to our Site. We use this information to monitor the usage of our 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.
- b. Information Collected via Cookies.** We use cookies to enhance the browsing and shopping experience with the It Works! Service. "Cookies" are small files or records that we place on your computer's hard drive to collect information about your activities while using the It Works! Service. The cookies transmit this information back to the computers at It Works! or our third-party distributors of banners and newsletters; these computers are, generally speaking, the only computers which are authorized to read such information. The information captured makes it possible for us (i) to speed navigation, keep track of items in your shopping cart, and provide you with custom tailored content; (ii) to remember information you gave to us so you don't have to reenter it each time you use the It Works! Service; (iii) to monitor the effectiveness of certain of our marketing campaigns; and (iv) to monitor total number of visitors, pages viewed, and the total number of banners served. Most people do not know that cookies are being placed on their computers when they use the It Works! Service or most web sites because browsers are typically set to accept cookies. You can choose to have your browser warn you every time a cookie is being sent to you or you can turn off cookie placement. If you refuse cookies, you will not be able to open an It Works! Shopping Cart and therefore will not be able to complete an order with us online. Also, by not using cookies, your overall Internet browsing experience will be affected.

- c. **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.
- d. **Information You Actively Submit to It Works!.** For most of the browsing services we provide, we neither require nor collect “Personal Customer Information” - your name, email address, billing address, shipping address, phone number and credit card information. You can use the It Works! Service 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: when you want to become an Independent Distributor (“Distributor”), open a Loyal Customer account or complete a retail order.
- e. **Web Analytics.** Google Analytics, a web analysis service of Google Inc. (“Google”) is used on this website. Google Analytics uses so-called “Cookies” allowing an analysis of your use of the website. The information about your use of the website created by a Cookie (including your IP address) is then transferred to a server of Google Inc. in the USA and stored there. Google will use this information to evaluate your use of the website, compile reports on website activities for the website operator and provide further data relating to website and Internet use. Google will transfer this information to third parties if prescribed by law or to the extent those third parties are commissioned by Google Inc. to process the data. Google will in no case link your IP address with other data of Google Inc. You may block the installation of Cookies by certain settings provided by your browser software; we would like to inform you however that in this case you may not be able to have full access to all website functions. Furthermore, you can prevent the compilation of data (including your IP address) through cookies and website use by downloading and installing the browser plug-in available through the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>. By using this website, you agree to the processing of the data gathered about you by Google in the way described above and for the aforementioned purposes. Further Information about Google Analytics and data protection is available through the following link <http://www.google.com/intl/de/analytics/privacyoverview.html>.

## 2. How your information is protected:

- a. **Encryption Technology** - The Personal Customer Information you provide - including your credit card information – to establish an account with us and to make purchases from us is secured using Secure Sockets Layer (SSL) encryption technology. We use this SSL technology to prevent such information from being intercepted and read as it is transmitted over the Internet. The encrypted data goes to a secure site where your information is stored on restricted-access computers located at restricted-access sites.
- b. **Password Security** - To further secure your Personal Customer Information (“PCI”), we require you to create a customer password when you establish an account with us. We encourage you to use a password that is not easily guessed (i.e., don’t use your name or street name). Keep your password secret; do not share it with anyone. If you forget your password, you can contact It Works! Customer Service and they will send you your password. It will be sent to the email address under which your It Works! account is assigned. If you want to change your password or other account information, simply log in to your eSuite and click on “Update Profile”.
- c. **Remember to Sign Out** - To further prevent unauthorized access to your account, remember that, after you sign in, you should sign out once you have (i) completed your transaction, (ii) completed managing your

account, or (iii) decided to step away from your computer. Anyone who accesses your computer after you have signed in but before you have signed out can access your account. This is especially true if you have Express Checkout enabled on your account.

- d. Alternative Customer Purchasing Options** - If you do not feel comfortable sending your credit card information to us over the Internet, you still can shop with us. We welcome you to call us through your local number and a Customer Service Representative will assist you with your order.
- e. PCI Compliance** - We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard nonpublic personal information and any other information, to ensure all customers that their privacy is a major part of our commitment to provide the finest service possible. We adopt appropriate security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our site.

### 3. How we use and share Personal Customer Information

Your personal data will be stored on various cloud hosting services such as Rackspace Azure and applications services in the U.S.A. Occasionally, in an anonymous manner, It Works! uses Personal Customer Information to market products and services. It Works! shares Personal Customer Information that we collect as follows:

- a. Subcontractors.** We send Personal Customer Information anonymously to third-party subcontractors and agents that work on our behalf to provide certain services. These third parties do not have the right to use the Personal Customer Information beyond what is necessary to assist us or fulfill your order. They are contractually obligated to maintain the confidentiality and security of the Personal Customer Information and are restricted from using such information in any way not expressly authorized by It Works!.
- b. Service Providers.** We send Personal Customer Information to third party providers of goods and services that you may purchase from time to time on our Site (e.g., ISPs). Like subcontractors, these third parties do not have the right to use the Personal Customer Information beyond what is necessary to assist us. They are contractually obligated to maintain the confidentiality and security of the Personal Customer Information and are restricted from using such information in any way not expressly authorized by It Works!. They are not permitted to forward information to a third party.
- c. Credit Card Companies.** Credit card transactions are handled by a third-party financial institution and their vendors, which receive the credit card number and other personal identifying information only to verify the credit card numbers and process transactions.
- d. Law Enforcement Investigations.** It Works! may release Personal Customer Information when required by law.
- e. Cross-Border Transfer** Your personal data may be transferred to another group company affiliated with It Works! if this is necessary for the implementation of the object of the respective contract and/or for the execution of your orders or for the provision of a service.
- f. Communications from It Works!.** As a Customer or Distributor, you may receive the following communications from It Works!: communications related to transaction and account maintenance activities. These communications include without limitation: surveys, enrollment confirmations, order confirmations; order update notices; order problem notices; and notices regarding material changes to Service policies and account management procedures.

- g. External Web-Use.** Our Service may contain links to websites operated by other companies. If you use such links, you will leave the website of It Works!. It Works! is not responsible for such third-party websites. The It Works! Privacy Policy does not apply to websites of third parties. Please check directly on such websites how such protected personal data are used.

## **6. Questions or Comments**

If you have any questions regarding your data or want to have any data deleted or changed, please email us at [privacy@itworks.com](mailto:privacy@itworks.com). You are entitled to receive any information about your data we have stored.

## **7. Changes to our Privacy Policy**

It Works! may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of the Service after any modification to this Privacy Policy will constitute your acceptance of such modification.