

Truvvilifestyle Privacy Policy

This Privacy Policy (“Policy”) describes how ACN Opportunity, LLC (“Company”, “we” or “us”) will collect, access, use and disclose information concerning You, including Your personal information and payment information. For purposes of this Policy, “You”, “Your”, “member”, “user” and similar terms mean an account holder or user with Truvvilifestyle. We know that You care how information about You is used and shared, and we appreciate Your trust that we will do so carefully and sensibly. This document will provide information about Company’s policy relating to the collection, use, and disclosure of personal information and of Your right to limit such collection, use, or disclosure. This Policy applies to information we collect on this site (the “Website”), including without limitation, via form submissions, purchases, and tracking tools as well as in email, text, and other electronic messages between You and Company. The Website includes, but is not limited to truvvi.com and all other sites owned and operated by Company that redirect to the Website, all subdomains provided through such other site or the Website, and all downloadable applications, features, functionality, content or information that is made available or provided on the Website. The Website is made available to you for the purposes of providing you with access to information about Company and its product offerings (the “Services”). For Your protection, we utilize a Secure Socket Layer (SSL) on all pages that require You to complete personal information.

We may change this Policy from time to time in our sole discretion, so please be sure to check back periodically. You can tell if this Policy has changed by checking the issued or last updated date that appears at the end of this Policy. We may, but are not obligated to, provide you with notice in case of any material changes made to this Policy. You should not continue using the Services if you do not agree with the version of this Policy in effect at that time. By continuing to use the Services, you agree and accept the version of this Policy in effect at that time. Any changes will be effective only after the effective date of the change and will not affect any dispute arising prior to the effective date of the change.

By voluntarily providing us with personal information through the use of Services and the Website, You are consenting to its collection, use and disclosure in accordance with this Policy. You acknowledge and agree that such personal information may be transferred from your current location to the offices and servers of Company and authorized third parties referred to herein located in Canada and the United States.

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What Personal Information About You Does Company Collect?

We collect Your personal information in order to provide You with the services, products, support, and experience that You may inquire about or contract with us to obtain.

Here are the types of personal information we collect:

- **Information You Give Us:** We receive and store any information You provide in relation to Your interactions with Company. Click [here](#) to see examples of what we collect. You can choose not to provide certain information, but, as a result, You may not have the same experience or, depending upon the

missing information, we may not be able to provide the services, products, or support You are seeking to obtain.

- **Automatic Information:** We automatically collect and store certain types of information about Your use of Truvvilifestyle, including information about Your interaction with content and Services available through the Truvvilifestyle Website(s). Like many websites, we use "cookies" and other tracking tools, and we obtain certain types of identifiers and other information when Your web browser or device accesses Truvvilifestyle and other content served by or on behalf of Company. Click [here](#) to see examples of what we collect.
- **Information from Other Sources:** We may receive information about You from other sources, such as our service providers, Independent Business Owners (IBOs), credit bureaus, or other business partners which we use to correct our records and assure continuity in providing Services, products, or support to You. Click [here](#) to see additional examples of the information we receive.

For What Purposes Does Company Use My Personal Information?

We use Your personal information to operate, provide, develop, and improve the services, products, and support that we offer. These purposes include:

- **Purchase and delivery of services, products, and support.** We use Your personal information to take and handle orders, provision of Services and products, process payments, provide access to training and support, and communicate with You about orders, services and products, and status updates.
- **Provide, troubleshoot, and improve the Website(s).** We use Your personal information to provide functionality, analyze performance, fix errors, and improve the usability and effectiveness of our Website(s).
- **Recommendations and personalization.** We use Your personal information to recommend services, products, and support that may be of interest to You, identify Your preferences, and personalize Your experience with Truvvilifestyle.
- **Comply with legal obligations.** In certain cases, we collect and use Your personal information to comply with laws. We may collect bank account information for identity verification and billing purposes.
- **Communicate with You.** We use Your personal information to communicate with You in relation to our services, products, and support.
- **Fraud Prevention and Credit Risks.** We use personal information to prevent and detect fraud and abuse in order to protect the security of You, Company, and others. We may also use scoring methods to assess and manage credit risks.

To the extent permitted by applicable law, we may use, process, transfer, and store any data about individuals and customers in an anonymous (or pseudonymous) and aggregated manner. We may combine personal information with other information collected online and offline, including information from third party sources. We may share anonymized data with third parties for business development purposes. By using the Website and/or the Services, You agree that we are hereby licensed to collect, use, share, and store anonymized (or pseudonymized) aggregated data collected through the Website or Your use of the Services for benchmarking, analytics, metrics, research, reporting, machine learning, and other business purposes.

How Are Cookies and Other Identifiers Used?

To enable our systems to recognize Your browser or device and to provide and improve the Website(s), we use cookies and other tracking tools. A cookie is a small file placed on the hard drive of Your computer. We also use browser "log files" which record certain information when You visit a Website, including your IP address. The first time You visit one our Website, You will receive notice about our use of cookies. You can control whether or not Your computer accepts cookies, by adjusting Your browser's settings (for example, under the "Internet Options", "Settings" or "Preferences" feature of Your browser). Please, note, however, that refusing to accept cookies may affect Your experience using our websites. For more information about how to manage or delete cookies, please go to the website www.allaboutcookies.org.

Does Company Share My Personal Information?

Information about You is an important part of our business, and we are not in the business of selling anyone's personal information to others. We share personal information only as described below and with affiliates or contracted business support service providers that either are subject to this Policy or follow practices meeting the practices outlined in this Policy.

- **Transactions involving Third Parties:** We make available to You services, products, support, or applications provided by third parties for use on or through our Website(s). For example, You may order services through Company that are provisioned by our third party service provider. You can tell when a third party is involved in Your transactions, and we share personal information related to those transactions with that third party to provide and deliver the service.
- **Third-Party Service Providers:** We employ other companies and individuals to perform functions on our behalf. Examples may include processing payments, scoring, assessing and managing credit risk, and providing technical support. These third-party service providers have access to personal information needed to perform their functions, but may not use it for other purposes. We may also share personal information with our affiliates or any business partners or agents acting on our behalf or with our financial, insurance, legal, accounting or other advisors that provide professional services to us.
- **Business Transfers:** As we continue to develop our business, we may sell or buy other businesses or services. In such transactions, information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing privacy notice or policy (and in accordance with any consents or requests formally made regarding Your information). Also, in the unlikely event that Company or substantially all of its assets are acquired, information will be one of the transferred assets.
- **Third-Party Advertising:** We do not share Your personal information with unaffiliated or non-agent third parties for promotional purposes. We do not control third parties' collection or use of Your information to serve interest-based advertising. However, these third parties may provide You with ways to choose not to have Your information collected or used in this way. You can find information about opting out of third party use of cookies or device identifiers by visiting Your browser's security settings.
- **Protection of Company and Others:** We release account and other personal information when we are compelled to do so by law; enforce or apply our Membership Terms & Conditions, Website Terms of Use and other agreements; or protect the rights, property, or safety of Company, our users, or others. This includes exchanging information with those organizations that may assist in fraud protection and credit risk reduction. As a result, subject to applicable law, we may disclose Your personal information to a government agency, court or law enforcement personnel.

Other than as set out above, You will receive notice when personal information about You may be shared with third parties, and You will have an opportunity to choose not to share the information.

How Secure Is Information About Me?

We design our systems with Your security and privacy in mind. While no method of processing, transmission, or storage is 100% secure, Company has instituted robust security measures designed to provide protection to your data.

- We work to protect the security of Your personal information during transmission by using reasonable encryption protocols and software.
- We and our trusted vendors follow and attest to our compliance with the Payment Card Industry Data Security Standard (PCI DSS) with respect to credit and debit card data.

- We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal information. Our security procedures mean that we may ask to verify Your identity before we disclose personal information to You.
- It is important for You to protect against unauthorized access to Your password and to Your computers, devices, and applications. We recommend using a unique password for Your Truvvilifestyle account (should You have one) that is not used for other online accounts. Be sure to sign off when finished using a shared computer. Never share your password with anyone and contact us immediately if you believe your password has been compromised.
- Company will never request sensitive personal information through email. Do not respond to e-mails requesting credit information, account numbers, passwords or PINs. Call Company to verify the legitimacy of the e-mail.

Therefore, despite our efforts, we cannot guarantee its absolute security. **WE DO NOT WARRANT OR REPRESENT THAT PERSONAL INFORMATION ABOUT YOU WILL BE PROTECTED AGAINST, LOSS, MISUSE, OR ALTERATION BY THIRD PARTIES.**

What Information Can I Access?

You can access Your information, including Your name, address, payment options, profile information, account settings, and purchase history in the self-service portal (if You are a member).

Company honors requests from the individuals whose personal information is held by Company. We maintain this information in a reasonably retrievable form, and will correct any such information which may be inaccurate. Individuals may verify that appropriate corrections have been made.

What Choices Do I Have?

If You have any questions as to how we collect and use Your personal information, please contact our Privacy Officer at the email included in this Policy. Whether You are a visitor to our Website(s) or have an account in a self-service portal, You have options as to how Your information is used that You can select.

- As described above, You can choose not to provide certain information, but then You may not be able to take advantage of specific services, have fulfilled certain products, or receive support.
- You can add or update certain information on pages within the self-service portal(s) if You have an account with Truvvilifestyle.
- If You do not want to receive email or other communications from us, please adjust Your preferences in the self-service portal relevant to Your relationship status with Company. You can also withdraw your consent to receive promotional emails by selecting the unsubscribe or opt-out link in the footer of promotional emails sent by Company.
- The Help feature on most browsers and devices will tell You how to prevent Your browser or device from accepting new cookies or other identifiers, how to have the browser notify You when You receive a new cookie, or how to block cookies altogether. Because cookies and identifiers allow You to take advantage of some essential features of our Website(s), we recommend that You leave them turned on. For more information about cookies and other identifiers, visit www.allaboutcookies.org.
- If You want to browse our websites without linking the browsing history to Your account, You may do so by logging out of Your account and blocking cookies on Your browser.
- You will also be able to opt out of certain other types of data usage by updating Your settings on the applicable Website(s) or application.
- Some browsers have a “do not track” feature that lets You tell websites that You do not want to have Your online activities tracked. At this time, we do not respond to browser “do not track” signals.

In addition, to the extent required by applicable law, You may have the right to request access to or delete Your personal information. If You wish to do any of these things, please contact the Privacy Officer. Depending on Your choices regarding cookies and privacy settings, certain services may be limited or unavailable.

Are Children Allowed to Transact with Company?

Company does not sell services or products for purchase by children. The Website is not directed to children, and Company does not knowingly collect information from children under 13 without verifiable parental consent. If You are under 18, You may use Truvvifestyle only with the involvement of a parent or guardian.

Third Party Links

From time to time, we may include links to third party websites which are not controlled or maintained by us. We are not responsible for personal information submitted by You to third party websites or the personal information collected by third party websites. You should review the privacy policies of third party websites or contact the third party website's operator if You have questions or concerns.

Conditions of Use, Notices, and Revisions

Company uses reasonable efforts to comply with the terms of this Policy and applicable law regarding the processing of Your Personal Data. Except as provided by applicable law, Company shall not be responsible for direct or indirect damages that may result from non-compliance with this Policy. If You have any concern about privacy at Company, please contact us with a thorough description, and we will try to resolve it. Our business changes constantly, and our Policy will change also. You should check our websites frequently to see recent changes. Unless stated otherwise, our current Policy applies to all information that we have about You and Your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of information collected in the past without the consent of affected individuals.

Should You have any questions with respect to the Policy or if You do not consent to, or would like to limit, the manner in which information about You is collected, used or disclosed, please contact the Privacy Officer in writing at 1000 Progress Place, Concord, NC 28025-2449 or via email at privacyofficer@acninc.com.

Examples of Information Collected

Information You Give Us When You Use Truvvifestyle

You provide information to us when You:

- Search or shop for services or product on our Website;
- Add or remove item(s) from Your cart, or otherwise transact with Company;
- Provide information regarding Your account in the self-service portal that is applicable to You;
- Configure Your settings or preferences for Your account;
- Communicate with us by phone, chat, snail mail or email, or otherwise; or
- Complete a questionnaire or enter a case ticket.

As a result of those actions, You may supply us with such information as:

- Identifying information such as Your name, address, email address, and phone numbers;
- Payment information;
- Login information such as username and password;
- Your age;
- People, addresses and phone numbers listed in Your account;
- Personal description and photograph in Your profile;
- Information and documents regarding identity, including Social Security and driver's license numbers;
- Corporate and financial information;
- Credit history information; and
- Other information that may communicated during contact for support.

Automatic Information

Examples of the information we collect and analyze include:

- the internet protocol (IP) address used to connect Your computer to the internet;
- the location of Your device or computer;
- metrics (e.g., the occurrences of technical errors, Your interactions with service features and content, Your settings preferences and backup information);
- version and time zone settings;
- purchase and content use history, which we sometimes aggregate with similar information from other individuals to create features;
- the full Uniform Resource Locator (URL) clickstream to, through, and from our websites, including date and time; products and content You viewed or searched for; page response times, download errors, length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouse-overs);
- phone numbers used to call our service numbers; and
- details regarding the initiation of chat communications.

We may also use identifiers, cookies, and other technologies on, applications, and our web pages to collect browsing, usage, or other technical information.

Information from Other Sources

Examples of information we receive from other sources include:

- Updated address information from our service providers, which we use to correct our records and assure continuity of the services You have purchased;
- Account information, purchase information, and page-view information from some our site analytics tools;
- Information about Your interactions with services and products features on our Website(s); and
- Credit history information from credit bureaus, which we use to help prevent and detect fraud.

Information You Can Access

Examples of information You can access through Company include:

- Status of recent orders (including subscriptions);
- Your complete order history;
- Personally identifiable information (including name, email, password, and address book);
- Payment settings (including payment card information and/or bank account information);
- Email notification settings (including marketing communications consent);
- Recommendations and the products You recently viewed;
- Your services, and related settings, and communications and personalized preferences;
- Content that You recently viewed; and
- Your Profile summary including summary of Your downline activity.

California and Other State Consumer Privacy Act Supplemental Notice

In accordance with the California Consumer Privacy Act (CCPA) and when applicable, other state consumer privacy laws, including in Connecticut, Colorado, Virginia, and Utah, Company includes the following additional details and / or provisions to our above Privacy Policy.

Information We Collect About You

Our Website collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or device (“Personal Information”). Specifically, our Website has collected one of more data elements listed in the following categories of Personal Information designated with “Yes” in the “Collected” column within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes
B. Personal Information Categories.	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No
D. Commercial information.	Records of personal property, solutions purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or	No

Category	Examples	Collected
	retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geo-location data.	Physical location or movements.	Yes
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No
L. Equipment information.	Information about Your internet connection, the equipment You use to access our Website, and usage details.	Yes

Personal information does not include:

- Publicly available information from government records.
- Aggregated or anonymized consumer information.
- Information excluded from the scope of the CCPA or other state laws, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), other similar state laws or clinical trial data (only in the case of employees); and

- personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Company will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing You notice.

Our Business Purposes

We use the personal information we may have about You to accomplish our business purposes, including:

- To conduct data analysis, for example, to improve the efficiency of our services;
- To conduct audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements;
- To monitor for fraud and security purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;
- To develop new products and services;
- To consider ways for enhancing, improving, or modifying our current products and services;
- To identify usage trends, for example, understanding which parts of our services are of most interest to users;
- To determine the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users; and
- For operating and expanding our business activities, for example, understanding which parts of our services are of most interest to our users so we can focus our energies on meeting our users' interests.

We engage in these activities to manage our contractual relationship with You, to comply with a legal obligation, and/or because we have a legitimate interest.

Disclosure of Your Information

We do not sell, share, trade, or rent User's Personal Information to others and we have not done so during the preceding twelve (12) months.

We may disclose Personal Information that we collect or You provide as described in this privacy policy according to the below:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Company about our Website users is among the assets transferred.
- To fulfill the purpose for which You provide it.
- For any other purpose disclosed by us when You provide the information.
- With Your consent.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose: (A) Identifiers, (D) Commercial Information, and (I) Professional Employment-Related Information.

Right to Know and Data Portability Rights

You have the right to request that Company disclose certain information to You about our collection and use of Your Personal Information over the past 12 months. Once we receive and confirm Your verifiable request (see Exercising Right to Know, Data Portability, Correction, and Deletion), we will disclose to You:

- The categories of Personal Information we collected about You;
- The categories of sources for the Personal Information we collected about You;
- Our business purpose for collecting that Personal Information;
- The categories of third parties with whom we share that Personal Information;
- The specific pieces of Personal Information we collected about You (also called a data portability request); and
- If we sold or disclosed Your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

Right to Correction

You have the right to request that Company correct inaccurate information that it maintains about you. Once we receive and confirm Your verifiable request (see Exercising Right to Know, Data Portability, Correction, and Deletion), we will confirm the correction, if applicable and appropriate. Company may deny a request to correct if it determines that the contested personal information is more likely than not accurate based on the totality of the circumstances.

Deletion Request Rights

You have the right to request that Company delete any of Your Personal Information that we collected from You and retained, subject to certain exceptions. Once we receive and confirm Your verifiable request (see Exercising Right to Know, Data Portability, Correction, and Deletion, below), we will delete (and direct our service providers to delete) Your Personal Information from our records, unless an exception applies.

We may deny Your deletion request if retaining the information is necessary for us or our service provider(s) to accomplish any of the following.

- Complete the transaction for which we collected the Personal Information, provide a good or service that You requested, take actions reasonably anticipated within the context of our ongoing business relationship with You, or otherwise perform our contract with You.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another individual to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.) or other similar state laws.

- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if You previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with expectations based on Your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which You provided it.

Exercising Right to Know, Data Portability, Correction, and Deletion

To exercise the right to know, data portability, correction, and deletion described above, please submit a verifiable request to us by either:

- Submitting a request at ACN, Inc., ATTN: Privacy Officer, 1000 Progress Place, Concord, NC 28025-2449; or
- Sending an email to privacyofficer@acninc.com

Only You, or a person properly authorized to act on Your behalf, may make a verifiable request related to Your personal information. You may also make a verifiable request on behalf of Your minor child.

Your requests must:

- Provide sufficient information that allows us to reasonably verify You are the person about whom we collected personal information or an authorized representative; and
- Describe Your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to Your request or provide You with personal information if we cannot verify Your identity or authority to make the request and confirm the personal information relates to You. Making a verifiable request does not require You to create an account with us. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

Non-Discrimination

We will not discriminate against You for exercising any of Your CCPA or other state privacy rights. Unless permitted by CCPA or another state privacy law, as applicable, we will not:

- Deny You goods or services;
- Charge You different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide You a different level or quality of services, products, or support; or
- Suggest that You may receive a different price or rate or a different level or quality of services, products, or support.

However, we may offer You certain financial incentives that can result in different prices, rates, or quality levels. Any financial incentive we offer will reasonably relate to Your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires Your prior opt in consent, which You may revoke at any time.

Right to Appeal

If you believe that Company has failed to take appropriate action in response to your privacy rights requests or you believe that we have denied your request improperly, you may appeal by contacting our Privacy Officer, 1000 Progress Place, Concord, NC 28025-2449; or privacyofficer@acninc.com.

Retention of Your Personal Information

We may retain your personal information for as long as necessary to fulfill the purpose for which it was collected or to comply with legal or regulatory requirements. We strive to retain your personal information no longer than is reasonably necessary to carry out the purposes listed in this Policy or as required by law.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their own direct marketing purposes. To make such a request, please submit a request at privacyofficer@acninc.com.

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