

ZYIA PRIVACY POLICY

Effective September 3, 2021

1. Introduction

Zyia Active, LLC, and its affiliates and subsidiaries (collectively, “Zyia,” “us,” “our,” or “we”), is a Utah-based active lifestyle brand that represents activity with excitement, vigor, and delight. Our mission is to inspire and uplift by making activity a fun and essential part of life through (i) Zyia websites (whether corporate or replicated) (each a “Website”), and (ii) a network of Zyia independent representatives (“Independent Representatives”).

If you have any comments or questions about this Privacy Policy or our privacy practices, or to exercise your rights as described below, please contact our Compliance Team at:

By mail:

Zyia Active, LLC
Attn: VP of Technology
294 W Life Science Way
Draper, UT 84020

By email: compliance@zyiaactive.com

2. Overview

Zyia Active, LLC, is committed to respecting and protecting your privacy. We act in accordance with the requirements of the applicable privacy and data protection laws in the markets where we operate. This privacy policy (“**Privacy Policy**”) explains how we collect, process, and share Personal Data (defined below) pertaining to our customers, Independent Representatives, and Website visitors (collectively, “you” and “your”). We also describe your rights and choices with respect to your Personal Data and other important information. Please read this Privacy Policy carefully before using our Services and/or providing us with your Personal Data (defined below). You can print this Privacy Policy by clicking [here](#).

This Privacy Policy applies to Personal Data collected through our “Services”, which include:

- Our “Offline Services” – Services provided to you by Independent Representatives; and
- Our “Digital Services” – all websites that link to/post this Privacy Policy, including, the Corporate Site located at www.zyiaactive.com, sites we provide for our Independent Representatives, located at www.myzyia.com and mycanadazyia.com (“Replicated Sites”), any subdomains, and mobile versions (collectively, the “Sites”).

Note that certain third parties may be able to identify you across sites and services using the information they process, however, any such processing not done at the direction of Zyia is outside the scope of this Privacy Policy. The Zyia Active mobile app is managed by a third party, Verb Technology Company, Inc., and is not subject to this Privacy Policy.

3. What Personal Data We Collect

“Personal Data” is data relating to identified or identifiable individuals and households (“**Personal Data**”). The Personal Data that we collect, and how we collect it, depends on how you interact with us. For example, if you are one of our customers, we may collect different types of data compared to data we may collect from one of our Independent Representatives or party hosts.

A. Categories of Personal Data We Process

The categories of Personal Data we collect and use include (these are examples may change):

<i>Contact Data</i>	Information such as your name; address; email address; telephone number; or account login details.
<i>Biographical Data</i>	Information such as your gender; date of birth, age and/or age range, nationality, photograph or videos containing your image, occupation, and information about your family (excluding special categories of data) including family, children, hobbies, and interests.
<i>Identity Data</i>	Information such as your passport number, permanent resident identification number, social security number, and any other identification details and documents and photocopies of identification documents, to the extent permissible under applicable laws.
<i>Location Data</i>	Information about your general location, including general location, which we may obtain from your IP address, or from your social media tags/posts (e.g. from a party you attend that is hosted by an Independent Representative).
<i>Device/Network Data</i>	Information such as your browsing history, search history, and information regarding your interaction with our Sites, or advertisements (e.g. IP Address, MAC Address, SSIDs or other device identifiers or persistent identifiers), online user ID, or device characteristics.
<i>Commercial Data</i>	Information such as your purchase history, details of products that we have sold to you, or product returns.
<i>Inference Data</i>	Personal Data used to create a profile about you reflecting your preferences (such as the products you seem to prefer based on use of our Sites or your purchases), as well as your characteristics, likes, interests, and other data or analytics provided about you by social media companies or data aggregators.
<i>Billing and Financial Data</i>	Information such as bank account details, payment card information, and information from credit reference agencies, including similar data defined in Cal Civ Code § 1798.80(e).
<i>Audio/Visual Data</i>	Photos, videos, recordings and images collected from audio files and records, such as voice mails, call recordings, and the like.
<i>User Data</i>	Information such as unstructured/free-form data that may include any category of Personal Data, e.g. data that you give us in free text fields such as comment boxes, Personal Data you provide when you complete forms on our Services (such as if you apply to become an Independent Representative), or answers you provide when you participate in sweepstakes, contests, and surveys.

B. The Sources of Personal Data We Collect From You

We collect Personal Data from various sources, which vary depending on the context in which we process that Personal Data:

1. As a Customer:

When you create a Zyia account

We may collect, or ask you to provide, your Contact Data, some Biographical Data, Location Data, Device/Network Data, Commercial Data, Billing and Financial Data, and other relevant information, as well as your communication preferences;

When you purchase Zyia products or services, or return products

We may collect, or ask you to provide, your Contact Data, Billing and Financial Data, Location Data, Commercial Data, and other relevant information;

When you register for Independent Representatives' newsletters

We may collect, or ask you to provide, your Contact Data and other relevant information, including User Data, as well as your communication preferences;

When you interact with Zyia

We may collect the Personal Data you provide to us at your own initiative, such as Contact Data and User Data, and any Personal Data we need to help resolve your query if, for example, you contact our customer service. If you call our customer service, your call may be recorded.

2. As an Independent Representative:

When you sign up to become a Zyia Independent Representative

We may collect your Contact Data, Device/Network Data, some Biographical Data, some Identification Data, Billing and Financial Data, and other relevant information, as well as your communication preferences;

When you purchase Zyia products or services, or return products

We may collect your Contact Data, Billing and Financial Data, Commercial Data, and other relevant information;

When you register to attend one of our events

We may collect you and your guest's Contact Data, Identity Data, and other relevant information including Biographical Data, Billing and Financial Data, and User Data;

When you report an adverse event case

We may collect, or ask you to provide, your Contact Data, as well as information or evidence regarding the product defect or other adverse event you suffered;

When you use our company IT systems or equipment

We may collect, or ask you to provide, your Device/Network Data related to your use of such equipment; and

When you otherwise

We may collect the Personal Data you provide to us at your own initiative through various communication channels, and any Personal Data we need to

*interact with
Zyia*

help resolve your query. If you call our customer service, your call may be recorded.

3. As a Job Applicant:

*When you apply
for a job with us*

We may collect, or ask you to provide, information relevant to your application such as some Identity Data, some Biographical Data, some Contact Data, employment history, and educational background;

*When you
otherwise
interact with
Zyia*

We may collect the Personal Data you provide to us at your own initiative through various communication channels, and any Personal Data we need to help resolve your query. If you call our customer service, your call may be recorded.

4. As a Website Visitor:

*When you visit
our Website or
use our Apps*

We automatically collect, store, and use technical information about your equipment and interaction with our Website and Apps (“General Information”) when you visit our Website or use our Apps. This General Information is sent from your computer or personal device to us using a variety of cookies and other technical means. You may manage this collection as described below in “WHAT ARE YOUR RIGHTS AND CHOICES REGARDING YOUR PERSONAL DATA.”

C. Your Obligations

We expect that the Personal Data that you communicate to us are correct and that, if your Personal Data requires updating, you will promptly inform us.

D. Personal Data We Collect From Third Parties

In some circumstances, we may receive Personal Data about you from (i) Independent Representatives, (ii) individuals who provide to us your Personal Data (e.g., your family members and friends); or (iii) social media companies, data aggregators, or other companies providing services to us.

Some of these third party sources may include publicly available sources of information. For example, we may receive Personal Data from social networks when you engage with our content, reference our Site or Service, or grant us permission to access information from the social networks.

In addition, we may collect, either directly or through third party service providers, information that is publicly available on the Internet (e.g. from websites, blogs, social media). Certain partners, social media companies, and third parties operating on our behalf create and infer Personal Data such as Inference Data or “Aggregate Data” based on our observations or analysis of other Personal Data processed under this Policy, and we may correlate this data with other data we process about you. We may combine any Personal Data about you that we receive from you, from other companies within our family of companies, and from third parties.

E. Children

Our Services are neither directed at nor intended for use by children under the age of 13 in the US, or under the age of 13 to 16 in the EU, depending on the local jurisdiction. We do not knowingly collect Personal

Data from such individuals. If we learn that we have inadvertently done so, we will promptly delete it. Do not access or use the Services if you are not of the age of majority in your jurisdiction unless you have the consent of your parent or guardian.

4. How We Use Your Personal Data

We generally process your Personal Data: (i) to fulfill our obligations under a contract with you, or to take steps prior to entering into a contract with you, (ii) to comply with a legal obligation, (iii) when it is in our legitimate business interest to use your Personal Data, or (iv) based on your consent. Our legitimate interests include operating, evaluating and improving our Services and organization; preventing and protecting us and others against fraud, unauthorized transactions, claims and other liabilities; and ensuring compliance with company policies and industry standards.

Our use of your Personal Data depends on who you are and how you interact with us. When you use our Services, we process your Personal Data in specific contexts and for certain specified purposes, as well as for our general business purposes and, in some cases, for commercial purposes.

Below is a list of the ways that we use your Personal Data and the reasons we rely on to do so.

A. How We Collect Personal Data

We collect and process Personal Data in several contexts when you use our Services, including:

i. When you make a purchase or other transaction

We generally process Identity Data, Billing and Financial Data, Commercial Data, and Contact Data when you engage in a purchase and sale transaction, whether through our Digital Services, over the phone, or in person through Offline Services. We process this Personal Data as necessary to perform or initiate a contract with you, process your order, and carry out fulfillment-related processing. In addition, we may also collect or create Device/Network Data and Inference Data. This data, together with other data we collect in this context is used in connection with legitimate business interests, such as ensuring the security of our Services, preventing fraud, providing information about our Services, contacting you about administrative matters, and responding to queries, complaints, or correspondence you send us. We may also use this Identity Data, Commercial Data, Contact Data, and Device/Network Data collected in this context for our Commercial Purposes.

ii. When you access or use our Digital Services

When you use our Digital Services, we automatically collect and process Device/Network Data. We use this data as necessary to initiate or fulfill your requests for certain features or functions through our Services, such as keeping you logged in, delivering pages, etc. In addition to Device/Network Data, we may also collect and process Contact Data, Identity Data, and Inference Data that we collect, create, and/or receive (including through the use of cookies and similar technologies). We typically use this data as necessary in connection with certain legitimate business interests, such as ensuring the security of our Sites and other technology systems, and analyzing the use of our Digital Services, to help us make improvements. We may process Personal Data in connection with your application to be a vendor, employee, Independent Representative, or otherwise join or support our team.

Some Digital Services may process Location Data (subject to your consent if required). We use this data, together with Inference Data and Device/Network Data, to provide directions and contextual information to you, and other features that require the use of location. Note, Location Data and Biographical Data may be required in order for you to use certain features of our Digital Services. We may also process Identity Data, Contact Data, and User Data if you interact with or identify us on social media platforms.

We may also use Identity Data, Device/Network Data, Location Data, Inference Data and Contact Data collected in this context for Commercial Purposes.

iii. Cookies and other tracking technologies

We use cookies and similar technologies on our Digital Services. These technologies can be used to collect or create Identity Data, Device/Network Data, Contact Data, or Inference Data. Third parties may be allowed to view, edit, or set their own cookies or place web beacons on our Sites. Cookies and web beacons allow us and third parties to distinguish you from other users of our Sites, and some of these technologies can be used by us and/or our third party partners to identify you across platforms, devices, sites, and services. Third parties may engage in targeted advertising using this data.

We and authorized third parties may use cookies and similar technologies for the following purposes:

- for “essential” or “functional” purposes, such as to enable certain features of our Digital Services (for example, to allow a customer to maintain a basket when they are shopping at an online store);
- for “analytics” purposes, such as to analyze the traffic to and usage of our Digital Services (for example, how many people have looked at a page, how visitors move around the Sites, what website they visited prior to visiting our Sites, and use this information to understand user behaviors and improve the design and functionality of the Sites);
- for “retargeting” or similar advertising or commercial purposes:
- for social media integration e.g. via third-party social media cookies, or when you share information using a social media sharing button or “like” button on our Services or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter;
- to collect information about your preferences and demographics to help target advertisements which are more likely to be of interest to you using behavioral advertising; and
- to allow us to carry out retargeting (this includes, for example, when advertisements are presented to you for products or services which you have previously looked at on our Sites but have not purchased).

The use of these technologies by third parties may be subject to their own privacy policies.

We may also use your Identity Data, Device/Network Data, Inference Data and Contact Data collected in this context for Business Purposes and Commercial Purposes.

iv. When you enter a contest or other promotion

We may collect and process Identity Data, Contact Data, Biographical Data, and User Data as necessary to process your request to enter a contest or promotion, notify you if you have won, deliver a prize or for related purposes. In addition, we may process this information to verify your identity for authentication and security purposes, and helping us to prevent fraud. If you win a contest/sweepstakes, we may publicly post some of your data on our Website (such as on a winners’ page). Unless prohibited by law, we may use this Identity Data, Contact Data, and User Data information for Commercial Purposes.

v. When you contact us or submit information to us

We may collect and process Biographical Data, Identity Data, Contact Data, and any Audio/Visual data or User Data you provide as necessary to address your request, fulfill the business purpose for which that information was provided, or for other related purposes. Additionally where you consent, if relevant to your request, or if otherwise permitted by law, we may send you marketing communications as described further below, and use this information for Commercial Purposes.

vi. Feedback and Surveys

We may process Identity Data, Contact Data, Inference Data, and User Data collected in connection with customer surveys or questionnaires. We generally process this Personal Data as necessary to respond to customer requests/concerns, and create aggregate analytics regarding customer satisfaction. We may store and analyze feedback for our purposes, for example, to personalize the Services, and help recommend relevant offers or services. We may also use the Identity Data, Contact Data, Inference Data, and User Data collected in this context for Business Purposes and Commercial Purposes.

B. How We Process Personal Data for Business Purposes

We and our service providers process Personal Data we hold for numerous business purposes, depending on the context of collection, your **rights and choices**, and our legitimate business interests. For example, we generally process Personal Data in connection with:

i. Service Provision and Contractual Obligations

We process any Personal Data as is necessary to provide our Services, to provide you with the products you purchase, to authenticate users, and as otherwise necessary to fulfill our contractual obligations to you. Additionally, we may use Personal Data as necessary to audit compliance, and log or measure aspects of service delivery (e.g. to document ad impressions).

ii. Internal Processing and Service Improvement

We may use Personal Data for improving our Services, understanding how our Services are used, for customer service purposes, in connection with logs and metadata relating to service use, and for debugging, and similar purposes.

iii. Security and Incident Detection

We may process Personal Data to improve the security of our Services, to identify and prevent crime, and prevent fraud. We may analyze network traffic, device patterns and characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.

iv. Compliance, health, safety, public interest

We may also process any Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law and make requests, for the establishment and defense of legal claims, or where we must comply with our legal obligations, lawful requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent allowed under applicable law.

v. Aggregated data

We process Personal Data about our customers and users in order to identify trends, such as to create aggregated and anonymized data about buying and spending habits, use of our Services, and other similar information (“**Aggregated Data**”). We may pass Aggregated Data to certain third parties to give them a better understanding of our business and to improve our Services. Aggregated Data will not contain information from which you may be personally identified.

vi. Personalization

We may personalize or customize aspects of the Digital Services based on your interactions with our content. This processing may involve the creation and use of Inference Data relating to your preferences.

C. How We Process Personal Data for Commercial Purposes

We and certain third parties process Personal Data we hold for certain commercial purposes, depending on the context of collection and your **rights and choices**, including:

i. Personalization & Consumer Profiles

In order to understand our customers’ preferences, and better recommend products and services to our prior customers, we may create a “**Consumer Profile**” by linking together and analyzing Personal Data collected in the various contexts as described in this Privacy Policy. We may also augment Consumer Profiles with Personal Data that we create (such as Inference Data) or that we receive from third parties, and may include Personal Data such as products you have purchased.

We use Consumer Profiles for market research and in connection with the improvement of our Services. For example, we may analyze the Personal Data of people who have made a purchase for a particular item in the past and compare them with other people in our database. If we identify people in the database who

have similar Personal Data to the previous customers, we may then target marketing via emails to the new people.

ii. Marketing Communications

We or our Independent Representatives may send you marketing and promotional communications if you sign up for such communications or purchase products from us. We may also send you these communications if you register for our Services or for a promotion, or in connection with your communications with or submission of User Data to us. These communications may be personalized based on your user profile. We may also collect Device/Network Data and Contact Data so that we can determine whether you have opened an email or interacted with our communications, and we may generate Inference Data based on these interactions. We may also process this Personal Data for targeted advertising.

iii. Targeted Advertising

We and certain third parties operating on or through our Services, may engage in targeted advertising. We generally use targeted advertising for the purpose of marketing our Services, to send marketing communications, including by creating custom marketing audiences on third-party websites (such as Facebook) or targeting users with advertisements on other websites.

iv. Data Sales

For purposes of the California Consumer Privacy Act, we do not sell your Personal Data.

5. Sharing and Transferring Your Personal Data

We may disclose your Personal Data to:

- other Zyia entities;
- third party service providers, such as companies providing us shipping and delivery services, telecommunication services, payment services, and others;
- a third party in the event that Zyia sells all or part of its assets to such third party or merges with or is acquired by the third party;
- any applicable regulatory, statutory, governmental or other relevant authorities, agencies or bodies and industry regulators, and any other person to whom Zyia is compelled, required or permitted to do so by law, rules or regulations, legal process or litigation; or
- any person pursuant to any order of a court of competent jurisdiction or comparable legal process.

In addition, if you are an Independent Representative or a customer, we may transfer your Personal Data to your upline Independent Representative and/or sponsor when we determine it necessary to ensure proper upline support or for Independent Representative educational purposes.

We do not and will not sell Personal Information to third parties; and in the past 12 months, we have not sold your Personal Information to any other entity.

6. HOW LONG WE RETAIN YOUR PERSONAL DATA

We retain Personal Data for so long as it, in our discretion, is necessary to achieve the processing purposes described in this Privacy Policy, and in any event, for so long as is required by law. We will review retention periods periodically and may sometimes pseudonymize or anonymize data held for longer periods.

7. WHAT ARE YOUR RIGHTS AND CHOICES REGARDING YOUR PERSONAL DATA

You may have certain rights and choices regarding the Personal Data we process. Please note these rights may vary based on the country or state where you reside, and our obligations under applicable law.

i. Marketing Communications

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email or by emailing compliance@zyiaactive.com.

ii. Withdrawing Your Consent/Opt-Out

Where we are processing your Personal Data based on your consent, you may change your mind and withdraw your consent at any time. The consequence of you withdrawing consent might be that we cannot perform certain Services for you.

iii. Location Preferences

You may control or limit Location Data that we collect through our Services by changing your preferences in your device's location services preferences menu.

iv. Do-Not-Track

Our Services do not respond to your browser's do-not-track request. If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser's settings menu. You must opt out of third party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Privacy Policy](#), or [Google Analytics Opt-out](#).

v. Advertising

You may opt out or withdraw your consent to behavioral advertising. To opt out of Google's use of cookies, visit Google's Ads Settings, [here](#). If you wish to take steps to opt-out of tracking by certain online advertisers, you can visit the Digital Advertising Alliance's opt-out page at <http://www.aboutads.info/choices> or the Network Advertising Initiative at www.networkadvertising.org/optout_nonppii.asp. You can limit or opt out of our processing for behavioral advertising by contacting us by email at compliance@zyiaactive.com.

8. HOW WE PROTECT YOUR PERSONAL DATA

While we endeavor to protect our systems, sites, operations and information against unauthorized access, use, modification and disclosure, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others.

9. THIRD PARTY WEBSITES AND MOBILE APPLICATIONS

We are not responsible for the privacy policies, content or security of any linked third party websites or mobile applications. We recommend that you check the privacy and security policies of each and every website and mobile application that you visit.

10. CHANGES TO OUR PRIVACY POLICY

We reserve the right to change our Privacy Policy from time to time. Any such changes will be posted on this page. Your continued use of our Services constitutes your acceptance of any revised Privacy Policy.

11. ADDITIONAL RIGHTS AND DISCLOSURES: CALIFORNIA

A. Your California Privacy Rights

Under the California Consumer Privacy Act ("CCPA") and other California laws, California residents may have the following rights, subject to your submission of an appropriately verified request:

Right to Know

You may request any of following, for the 12 month period preceding your request:
(1) the categories of Personal Data we have collected about you, or that we have sold, or disclosed for a commercial purpose; (2) the categories of sources from

which your Personal Data was collected; (3) the business or commercial purpose for which we collected or sold your Personal Data; (4) the categories of third parties to whom we have sold your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.

<i>Right to Delete</i>	You have the right to delete certain Personal Data that we hold about you, subject to exceptions under applicable law
<i>Right to Non-Discrimination</i>	You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.
<i>Direct Marketing</i>	You may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.
<i>Opt-Out of Sale</i>	If we “sell” of data (as defined by applicable law), you may direct us to stop selling your data to third parties for commercial purposes.
<i>Minors’</i>	To the extent we have actual knowledge that we collect or maintain personal information of a minor under age 16, those minors between the age of 13 and 16 must opt in to any sales of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales of personal information (as defined under CCPA); all minors have the right to opt-out later at any time.
<i>Minors’ User Content</i>	Individuals under the age of 18 in California have the right to delete posts on our Services by contacting us at compliance@zyiaactive.com . We cannot guarantee comprehensive removal of content posted through the Services.

B. Submission of Requests

You may submit requests to compliance@zyiaactive.com.

C. Verification of Requests

All rights requests must be verified. We may require that you provide the email address we have on file for you (and verify that you can access that email account) as well as other data we have on file, in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent’s authority to act on your behalf.

D. Data Processing

i. Categories of Personal Data Disclosed for Business Purposes

For purposes of the CCPA, we may disclose to Service Providers for “business purposes” the following categories of Personal Data: Biographical Data, Identity Data, Contact Data, Location Data, Device/Network Data, Commercial Data, Inference Data, Billing and Financial Data, Audio/Visual Data, and User Data.

ii. Categories of Personal Data sold

For purposes of the CCPA, we do not “sell” your Personal Data.

If you are a California Resident, you have the right to opt out of data sales. If we have engaged in any sales of your Personal Information, you may do so by emailing compliance@zyiaactive.com or by calling us at 435-383-5263. You may be required to validate your identity to ensure your request is not fraudulent.

iii. Right to Know

Category of Data	Context	Category of Sources	Business Purposes	Commercial Purposes	Category of Recipients
Contact Data	<ul style="list-style-type: none"> When you make a purchase or other transaction When you access or use our Digital Services Cookies and other tracking technologies When you enter a contest or other promotion When you contact us or submit information to us Feedback and surveys 	From you; Independent Representatives; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Other Zyia entities; Third party service providers; corporate transactions; legal process; upline Independent Representative and/or sponsor
Biographical Data	<ul style="list-style-type: none"> When you access or use our Digital Services When you enter a contest or other promotion When you contact us or submit information to us 	From you; Independent Representatives; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data;	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Other Zyia entities; Third party service providers; corporate transactions; legal process; upline Independent Representative and/or sponsor

			Personalization		
Identity Data	<ul style="list-style-type: none"> When you make a purchase or other transaction When you access or use our Digital Services Cookies and other tracking technologies When you enter a contest or other promotion When you contact us or submit information to us Feedback and surveys 	From you; Independent Representatives; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Other Zyia entities; Third party service providers; corporate transactions; legal process; upline Independent Representative and/or sponsor
Location Data	<ul style="list-style-type: none"> When you access or use our Digital Services 	From you; Independent Representatives; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Other Zyia entities; Third party service providers; corporate transactions; legal process; upline Independent Representative and/or sponsor
Device/ Network Data	<ul style="list-style-type: none"> When you make a purchase or other 	From you; Independent Representatives; individuals	Service Provision and Contractual	Personalization & Consumer Profiles; Marketing	

	<ul style="list-style-type: none"> transaction When you access or use our Digital Services Cookies and other tracking technologies 	<p>who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers</p>	<p>Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization</p>	<p>Communications; Targeted advertising</p>	
Commercial Data	<ul style="list-style-type: none"> When you make a purchase or other transaction 	<p>From you; Independent Representatives; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers</p>	<p>Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization</p>	<p>Personalization & Consumer Profiles; Marketing Communications; Targeted advertising</p>	<p>Other Zyia entities; Third party service providers; corporate transactions; legal process; upline Independent Representative and/or sponsor</p>
Inference Data	<ul style="list-style-type: none"> When you make a purchase or other transaction When you access or use our Digital Services Cookies and other tracking technologies Feedback and surveys 	<p>From you; Independent Representatives; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing</p>	<p>Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health,</p>	<p>Personalization & Consumer Profiles; Marketing Communications; Targeted advertising</p>	<p>Other Zyia entities; Third party service providers; corporate transactions; legal process; upline Independent Representative and/or sponsor</p>

		services to us; third party service providers	safety, public interest; Aggregated data; Personalization		
Billing and Financial Data	<ul style="list-style-type: none"> When you make a purchase or other transaction 	From you; Independent Representatives; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Other Zyia entities; Third party service providers; corporate transactions; legal process; upline Independent Representative and/or sponsor
Audio/Visual Data	<ul style="list-style-type: none"> When you contact us or submit information to us 	From you; Independent Representatives; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Other Zyia entities; Third party service providers; corporate transactions; legal process; upline Independent Representative and/or sponsor
User Data	<ul style="list-style-type: none"> When you access or use 	From you; Independent	Service Provision	Personalization & Consumer	Other Zyia entities;

	<p>our Digital Services</p> <ul style="list-style-type: none"> • When you enter a contest or other promotion • When you contact us or submit information to us • Feedback and surveys 	<p>Representatives; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers</p>	<p>and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization</p>	<p>Profiles; Marketing Communications; Targeted advertising</p>	<p>Third party service providers; corporate transactions; legal process; upline Independent Representative and/or sponsor educational purposes.</p>
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