

# Privacy Policy

Keeping Personal Data secure is a top priority of Nature's Sunshine. We comply with the various privacy and data protection laws applicable in the countries and markets where we operate. This Privacy Policy outlines our views and practices and how they pertain to you as Consultant, Affiliate, Customer, Site visitor, or office visitor. Please note that not all sections of this Privacy Policy may apply to you based on how you interact with us. Please check back periodically, as these policies may change, and your subsequent use of the Site will be deemed acceptance of such changes. However, our fundamental commitment to protecting visitors' privacy will not change.

## 1. Who is Nature's Sunshine?

Nature's Sunshine Products, Inc. and its affiliates and subsidiaries ("NSP", "we", "us", or "our") are leading natural health and wellness companies, marketing and distributing nutritional and personal care products in more than 40 countries through (a) NSP websites; (b) NSP apps and tools; and (c) a network of independent Consultants, Affiliates, and Customers. You will find a list of the NSP entities acting as Personal Data controllers in Table 1 below.

We have appointed the following company as our EU representative with regards to the GRPD compliance: Nature's Sunshine Europe Sp. Z O.O., with identification number 0000248004, and domiciled at Poland, Warsaw (02-604), 7 Olkuska St., telephone number +48 22 311 21 00 email [privacy@natr.com](mailto:privacy@natr.com).

## 2. What information do we collect?

**Personal Data.** We may collect Personal Data from you based on how you interact with us, informing you always of the purposes of the collection, and with your permission. Personal Data is any information that relates either directly or indirectly to an identified living individual, or legal entity where applicable. In this Privacy Policy, Personal Data includes the terms personally identifiable information, personal information, or any other term used by applicable law. We have outlined the categories of Personal Data we collect in various instances below. If you wish to see how we use Personal Data, please refer to Section 3 "How do we use Personal Data?"

**Categories of Personal Data.** The general categories of Personal Data we collect, and for which we will ask specifically for your consent, are:

- Contact information such as name, title, address, email address, telephone or fax numbers;
- Biographical information such as gender, birthday, nationality, photographs or videos provided by you containing your image, occupation, family life information including children, hobbies, and interests;
- Identification information such as passport numbers, identification numbers, or photocopies of such documents as long as permitted by applicable law;
- Registration information such as newsletter or marketing material requests, event and incentive registrations, subscriptions, downloads, signup forms, survey responses, and username/passwords;
- Financial information such as bank account details, credit/debit card details, copies of bank or other financial statements, and other information necessary to verify or process financial transactions;
- Product information such as purchase history, product returns, product preferences;

- IT systems information such as technical information about your equipment used to access Sites, your activity on our Sites;
- Information You Volunteer through various interactions including with the Sites, customer service, or other NSP employees;

We may also collect publicly available information such as identification, content, audio/visual, employment, demographic, or geographic information available via the internet. NSP does not collect information about you from other sources, e.g., public records or bodies, or private organizations.

**Information Collected Automatically.** We do not automatically log Personal Data, nor do we link information automatically logged by other means to Personal Data about specific individuals. However, if you accept our cookies, we may record certain information that becomes available to us through your use of the Site, including, without limitation, the number of visitors and frequency of visits to the Site, the websites that you access immediately before and after the Site, the Internet browser you use, and your IP address. If we use this information, it is only on an aggregate basis.

**Cookies and Other Similar Technologies.** Like most websites, we use cookies, or data files automatically stored on your computer, to enhance your visit to the Site by better understanding how visitors use the Site. In general, cookies do not contain any Personal Data unless you as a visitor knowingly supply the information. We use cookies in order to recognize you when you return to the Site and to provide you with a better user experience. We do not use cookies to store Personal Data nor do we link non-Personal Data stored in cookies with Personal Data about specific individuals. We may allow third parties to use cookies or similar technologies on the Site, but we do not control the use or contents of third-party cookies. Web browsers often permit you to erase cookies from your browser cache, block cookies, or receive notification when cookies are used. However, if you block the use of cookies, you may not be able to take full advantage of the Site features.

**Do Not Track Requests.** Web browsers may allow you to send a “Do Not Track” request with your browsing traffic, which would enable anonymous browsing of the Site. We honor Do Not Track requests from web browsers. However, anonymous browsing may prevent us from providing you with full functionality of the Site.

### 3. Why do we collect Personal Data?

We may collect Personal Data for a number of reasons, which we will specify before asking for your consent, including:

**To prepare and perform an agreement with you.** This includes agreements such as a Consultant or Affiliate agreement, which may involve calculating your earnings or those of other NSP Consultants, Affiliates, or Customers, and maintaining such information on your membership genealogy; process an order; deliver/take-back products and manage warranties; or payment processing.

**To meet our legal obligations.** This includes obligations such as tax and accounting or responding to request from public authorities.

**To fulfill our legitimate business purposes.** This includes purposes such as providing our services; maintaining the security and integrity of our services; to improve the user/member experience of the Site;

to enforce our terms of use, policies and procedures and other rights; or to provide you with information that you may request or opt to receive regarding our products and services.

**Because of your consent.** You may consent to receive services or offerings; participate in events and challenges; have your information used in connection with marketing of our products and or services; the use of cookies as explained below. You may withdraw your consent as set out below, but you may not be able to the Site or our products or services if you do.

\*You may have the right to oppose certain of these reasons under applicable law, but if so, you may not be able to experience the full functionality of the Site.

## 4. How do we use Personal Data?

If you choose to provide us with Personal Data, we will use it to provide you with the services you have requested, to serve you with content, to analyze trends, and to enhance your overall experience while visiting the Site.

You may also subscribe to email lists and request that we refer you to an NSP Consultant who can provide you with more information about how to purchase NSP products and become an NSP Consultant.

If you purchase NSP products or become a NSP Consultant, we will also use your Personal Data to (1) provide services to you (such as processing product orders and/or returns and calculating and paying commissions); (2) support and improve the services you render to customers and downline Consultants; (3) provide you with additional services; (4) maintain our genealogy database and the proper functioning of our compensation plan; (5) issue payment and report income to taxing authorities; and (6) ensure compliance with legal obligations and our Policies & Procedures. In furtherance of these purposes, NSP may share your information with its parent company in the United States and its subsidiaries located in other countries. We do not collect, use, or disclose Personal Data for any other purposes that are materially different from the purposes set forth herein. We will ask for your consent before we collect any of your data, specifying the purposes for which your data are required.

We process Personal Data on legal grounds including (a) fulfilling obligations under a contract to you; (b) to comply with our own legal obligations; (c) when we have a legitimate interest to use Personal Data; or (d) based on your consent.

## 5. Sharing Information with Third Parties

NSP may use internal and external service providers to operate the Site and perform other work on our behalf in the course of providing you with services you have requested such as developing the Site; fulfilling orders; delivering packages; administrative or accounting functions; and providing customer service. These service providers may have access to your Personal Data but are contractually bound to use your Personal Data only for the purpose of performing their duties. Even so, we remain responsible for your Personal Data and in cases of onward transfer to third parties of data of EEA data subjects received pursuant to the EU-U.S. Privacy Shield, NSP is potentially liable. Some of these service providers may be established in countries that offer less privacy protection than your country of residence. In this case, we will make sure that these service providers are contractually bound to offer the same protection than in your country of residence through Standard Contractual Clauses.

NSP does not currently sell, trade or rent your Personal Data to any unaffiliated third parties for marketing purposes. We value your privacy and will not jeopardize our relationship with you by selling your information to solicitors without your prior consent.

NSP may, however, share your Personal Data to fulfill our legal obligations (i) in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, (ii) in response to lawful requests by private parties, in connection with a lawsuit, subpoena, investigation or similar proceeding, (iii) to respond to a matter of personal or public safety, (iv) to investigate security incidents, (v) to protect our interests, rights and property, or (vi) in the event of a sale or transfer of assets, or in the context of similar business negotiations.

## **6. Security of Information**

NSP takes administrative, technical and physical measures to help ensure that your Personal Data remains accurate, timely and secure. However, no data transmission over the Internet, or through an electronic database, is guaranteed to be 100% secure. Although we strive to protect your information through measures such as the following steps, we cannot guarantee or warrant its security:

NSP uses Secure Socket Layers (SSL) to ensure a secure connection whenever transmitting or receiving Personal Data. With SSL, information transmitted between two computers via the Internet is sent in an encrypted format so that only the sending and receiving computers can decode it. SSL ensures that no one intercepts any of your Personal Data while it is being transferred to us. A secure connection is maintained until the checkout process is either completed or canceled.

NSP restricts access to Personal Data to our employees, contractors and agents who need to know that information in order to perform their jobs. They are obligated to respect the confidentiality of your Personal Data and may be disciplined or terminated for failing to meet these obligations.

## **7. Data Integrity & Access or Corrections**

NSP keeps Personal Data in active files or systems as long as necessary in order to fulfill the purposes for which it was collected or as required to perform our contractual relationship with our Consultants, Affiliates, or Customers. After a Consultant, Affiliate, or Customer terminates his or her relationship with us, we must keep some information for accounting purposes, for the calculation of earnings under our compensation plan, and for compliance purposes, according to the applicable law. We will make reasonable efforts to ensure that the information is accurate and complete and will update or correct your information as needed when notified by you. You may request copies of your Personal Data by contacting us at our contact information listed below in Section 12. You or your representatives may edit your Personal Data by accessing your account profile. In instances where a Customer purchases product offline, directly from a Consultant, we may not have access to the Customer's Personal Data, and you will need to contact your Consultant directly.

Depending on the law in your area, you may have various rights concerning Personal Data, which may include, a right of access, rectification, restriction of or objection to processing (including for direct marketing), portability to another controller, or erasure. You may exercise some of these rights through functionality on the Site. Where the functionality is not available you may contact NSP through the contact information provided below. Please be aware that the rights listed above may be subject to various limitations set out by law.

## **8. Consultant and Affiliate/Customer Organizational Data**

You may place an order through your Consultant, Affiliate/Customer, or directly with NSP and NSP will share your information with your upline Consultant or Affiliate/Customer in order to process your order. Each customer may choose how to place an order and how to be contacted when placing an order. A Consultant, Affiliate, or Customer who introduces a new Consultant, Affiliate, or Customer to the NSP business is known as a Sponsor and Sponsors may build their own independent sales organizations. To assist with their businesses, NSP provides Sponsors with organizational reports that contain their Consultant, Affiliate, and Customer Personal Data and business data, including, but not limited to, name, address, NSP identification number, telephone number, email address, fax number, level or rank within the NSP compensation or sharing plan, and volume and sales statistics. These reports are provided to Consultants, Affiliates, and Customers in the strictest confidence and for the sole purpose of developing their NSP businesses and constitute the confidential, proprietary trade secrets of NSP. Some NSP Consultants, Affiliates, or Customers may live in countries that offer less privacy protection than your country of residence. In this case, we will make sure that these NSP Consultants or Affiliates are contractually bound to offer the same protection than in your country of residence through Standard Contractual Clauses.

## **9. Children**

The Site is a general audience website and is not designed or targeted at children. NSP does not knowingly collect, use or disseminate any Personal Data from children under the age of 14. If you believe we may have collected information from your child on the Sites, please contact us and we will make reasonable efforts to delete the information from our records.

## **10. Third-Party Links**

The Site may contain links to web sites operated and maintained by third parties over which we have absolutely no control. Any information you provide to third party websites will be governed under the terms of each websites' privacy policy and we encourage you to investigate and ask questions before disclosing any information to the operators of third-party websites. We have no responsibility or liability whatsoever for the content, actions or policies of third-party websites. The inclusion of third-party websites on our Site in no way constitutes an endorsement of such websites' content, actions or policies.

## **11. Privacy Shield Statement. EU Personal Data Transfers**

NSP recognizes that the European Union and its member states have a data protection regime that generally restricts the transfer of PII about individuals located in the EU to recipients located outside of the European Economic Area ("EEA"). Nature's Sunshine Products, Inc., Synergy Worldwide, Inc. and their U.S. affiliate entities comply with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and the United Kingdom to the United States in reliance on Privacy Shield. NSP has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [www.privacyshield.gov](http://www.privacyshield.gov). [www.privacyshield.gov](http://www.privacyshield.gov). EEA data subjects

who have questions or complaints regarding NSP's transfer or treatment of their personally identifiable information may file a complaint with NSP at the contact information below.

On July 16, 2020, the Court of Justice of the European Union issued a judgment declaring as "invalid" the European Commission's Decision (EU) 2016/1250 of 12 July 2016 on the adequacy of the protection provided by the EU-U.S. Privacy Shield. As a result of that decision, the EU-U.S. Privacy Shield Framework is no longer a valid mechanism to comply with EU data protection requirements when transferring personal data from the European Union to the United States. That decision does not relieve participants in the EU-U.S. Privacy Shield of their obligations under the EU-U.S. Privacy Shield Framework.

On September 8, 2020 the Federal Data Protection and Information Commissioner (FDPIC) of Switzerland issued an opinion concluding that the Swiss-U.S. Privacy Shield Framework does not provide an adequate level of protection for data transfers from Switzerland to the United States pursuant to Switzerland's Federal Act on Data Protection (FADP). As a result of that opinion, organizations wishing to rely on the Swiss-U.S. Privacy Shield to transfer personal data from Switzerland to the United States should seek guidance from the FDPIC or legal counsel. That opinion does not relieve participants in the Swiss-U.S. Privacy Shield of their obligations under the Swiss-U.S. Privacy Shield Framework.

The U.S. Department of Commerce will continue to administer the Privacy Shield program, including processing submissions for self-certification and re-certification to the Privacy Shield Frameworks and maintaining the Privacy Shield List. If you have questions, please contact the European Commission, the appropriate European national data protection authority or legal counsel.

In compliance with the Privacy Shield Principles, NSP commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact NSP at:

Nature's Sunshine Products, Inc.  
Privacy Officer, Legal  
2901 W. Bluegrass Blvd., 100  
Lehi, Utah 84043 (801)  
341-7800  
[privacy@natr.com](mailto:privacy@natr.com)

NSP has further committed to refer unresolved Privacy Shield complaints to our chosen independent recourse mechanism, the International Centre for Dispute Resolution® of the American Arbitration Association® (ICDR/AAA), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit [go.adr.org/privacyshield.html](https://go.adr.org/privacyshield.html) for more information or to file a complaint. Under certain conditions, more fully described on the Privacy Shield website, you may invoke binding arbitration when other dispute resolution procedures have been exhausted. The ICDR/AAA services are provided at no cost to you. In addition, NSP is subject to the investigatory and enforcement powers of the Federal Trade Commission.

**EU Personal Data Transfers with Standard Contractual Clauses.** We recognize that the European Union and its member states have a data protection regime that generally restricts the transfer of Personal Data about individuals located in the EU to recipients located outside of the European Economic

Area ("EEA"). We inform you that your Personal Data might be transferred to other entities inside our group outside your country of residence, and particularly to the US. These data transfers were done in the past first according to the EU-U.S. Safe Harbor Framework, and later according to the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personally identifiable information from the EEA. Now these data transfers are done in compliance with our Standard Contractual Clauses, according to the European Commission Decision C(2004)5721 and the rest of regulations applicable in order to guarantee that your Personal Data are duly protected. In order to get more information, you can access the Standard Contractual Clauses applicable to certain countries linked in Table 1 below.

## 12. Questions and Complaints

NSP takes your privacy seriously. If you believe we have not complied with this Privacy Policy, please contact us so we can investigate your complaint. For users in the European Union, if you have concerns about NSP's use or collection of Personal Data and we cannot solve such concern, you have the right to file a complaint with the supervisory authority in your jurisdiction.

Direct inquiries or concerns about our privacy policy to:

Privacy Team  
Nature's Sunshine Products, Inc.  
2901 West Bluegrass Blvd. STE 500 Lehi,  
Utah 84043  
[privacy@natr.com](mailto:privacy@natr.com)

Please summarize the nature of your question in the subject line of any email you send.

If you desire to exercise your rights of information, access, correction or deletion of personal data, right to portability of data, right of objection to processing, or to reject the existence of any automated decisionmaking or profiling relating to the Personal Data, please send us an email to [privacy@natr.com](mailto:privacy@natr.com).

You can also contact us writing to:

Privacy Team  
Nature's Sunshine Products, Inc.  
2901 West Bluegrass Blvd. STE 500  
Lehi, Utah 84043 [privacy@natr.com](mailto:privacy@natr.com)

We also inform that we have appointed as our Data Protection Officer in Europe:

ADDIENS ASESORES JURÍDICOS Y TRIBUTARIOS, SLP,  
Travessera de Gracia, 29, 2º 1ª [p.minana@addiensajt.com](mailto:p.minana@addiensajt.com)  
+34932413090

Thank you for reviewing this policy.

\*Because privacy laws change frequently NSP reserves the right to amend this policy from time to time. Please visit the Site periodically to obtain the latest version of this policy.

Date of Last Revision: December 1, 2020