

ACN Privacy Policy

Last updated: 1 December 2022

All Communications Network of Canada Co. and its affiliates (collectively “ACN” or “we”) are committed to protecting the privacy of personal information of our customers, independent business owners (“IBOs”), employees, and business partners (collectively “You” or “Your”). 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 ACN’s policy relating to the collection, use, and disclosure of personal information and of Your right to limit such collection, use, or disclosure. This Notice 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 ACN. The Website includes, but is not limited to and all other sites owned and operated by ACN 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 ACN 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 Privacy Policy from time to time in our sole discretion, so please be sure to check back periodically. You can tell if this Privacy Policy has changed by checking the last updated date that appears at the beginning of this Privacy Policy. We may, but are not obligated to, provide you with notice in case of any material changes made to this Privacy Policy. You should not continue using the Services if you do not agree with the version of this Privacy Policy in effect at that time. By continuing to use the Services, you agree and accept the version of this Privacy 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 Privacy Policy. You acknowledge and agree that such personal information may be transferred from your current location to the offices and servers of ACN and authorized third parties referred to herein located in Canada and the United States.

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What Personal Information About You Does ACN 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 ACN. 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 ACN, including information about Your interaction with content and Services available through the Website. 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 ACN and other content served by or on behalf of ACN. 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, 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 ACN 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 ACN site(s).** We use Your personal information to provide functionality, analyze performance, fix errors, and improve the usability and effectiveness of our ACN site(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 ACN.
- **Comply with legal obligations.** In certain cases, we collect and use Your personal information to comply with laws. For instance, we collect from business partners certain taxpayer information to report properly. We may collect bank account information for identity verification and billing purposes from our customers, IBOs, and employees.
- **Communicate with You.** We use Your personal information to communicate with You in relation to ACN 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, ACN, 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 of our Websites, 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 ACN Share My Personal Information?

Information about You, whether You are a customer, IBO, employee, or business partner, 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 Privacy Notice or follow practices meeting the practices outlined in this Privacy Notice.

- **Transactions involving Third Parties:** We make available to You services, products, support, or applications provided by third parties for use on or through the Website(s). For example, You may order services through ACN 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 (and in accordance with any consents or requests formally made regarding Your information). Also, in the unlikely event that ACN or substantially all of its assets are acquired, information will be one of the transferred assets.
- **Protection of ACN and Others:** We release account and other personal information when we are compelled to do so by law; enforce or apply our Terms of Use and other agreements; or protect the rights, property, or safety of ACN, 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 regulations, we may disclose Your personal information to a government agency, court, or law enforcement personnel.

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.

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, ACN 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 ACN 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.
- ACN will never request sensitive personal information through email. Do not respond to e-mails requesting credit information, account numbers, passwords or PINs. Call ACN 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 customer or IBO).

ACN honors requests from the individuals whose personal information is held by ACN. 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 Privacy Policy. Whether You are a visitor to our Website 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 ACN.
- 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 ACN. You can also withdraw your consent to receive ACN promotional emails by selecting the unsubscribe link in the footer of a promotional email sent by ACN.
- 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, 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 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 ACN Privacy Officer. Depending on Your choices regarding cookies and privacy settings, certain services may be limited or unavailable.

Are Children Allowed to Transact with ACN?

ACN does not sell services or products for purchase by children. The Website is not directed to children, and ACN does not knowingly collect information from children under 13 without verifiable parental consent. If You are under 18, You may use ACN 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

ACN uses reasonable efforts to comply with the terms of this Privacy Policy and applicable law regarding the processing of Your Personal Data. Except as provided by applicable law, ACN shall not be responsible for direct or indirect damages that may result from non-compliance with this Privacy Policy.

If You have any concern about privacy at ACN, please contact us with a thorough description, and we will try to resolve it. Our business changes constantly, and our Privacy Policy will change also. You should check our Websites frequently to see recent changes. Unless stated otherwise, our current Privacy 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 ACN Privacy 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 ACN Privacy Officer in writing at ACN Inc., 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 ACN

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 ACN;
- 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;
- Complete a questionnaire or case ticket; or
- Attend a training event.

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 addresses;
- Personal description and photograph in Your profile;
- Information and documents regarding identity, including Social Security (or social insurance number) and driver's license numbers;
- Corporate and financial information;
- Credit history information; and
- Other information that may be 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;
- ACN 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 of our site analytics tools;
- Information about Your interactions with services and products features on our Websites; 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 ACN 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.