

# Privacy Policy

Effective August 1, 2024



MAKE WELLNESS and its affiliates and subsidiaries respects your concerns about privacy and values the relationship we have with you. This Privacy Policy describes the types of personal information we collect about our customers, including in-store and online, how we use the information, with whom we share it, and the choices available to our customers regarding our use of the information. We also describe the measures we take to protect the security of the information and how our customers can contact us about our privacy practices.

In order to exercise any of your rights described herein, you can contact us using the details at the section "Contact Us" below.

## 1. Information We Collect

We may obtain information about you from various sources. We may collect information when you purchase goods or services from us, provide it to us at one of our stores, on our website ([www.makewellness.com](http://www.makewellness.com)), via our social media pages, at one of our events or if you contact us by telephone.

Our products are available for sale online, in our retail stores and many department stores. Unless otherwise indicated at the time that you provide your information, any information collected in a department store is not provided to us. This Policy does not address any data collection by any of our retail partners. When you visit a MAKE WELLNESS website or our social media pages, we may also collect certain information about your device or usage by automated means, including using technologies such as cookies, web server logs and web beacons.

## 2. Information You Provide

You may choose to provide information to us in a number of ways, such as when you participate in an offer or promotion, when you make a purchase on our site or in our stores or via our social media pages. The types of information you may provide to us includes:

- Contact information (such as name, postal address, email address, mobile or other phone number)
- Age and date of birth
- Gender
- Payment information (such as your delivery address and billing address)
- Purchase history
- Account information (user ID and password)
- Product preferences and feedback
- Location information

- Your physical characteristics, skincare concerns and preferences
- Information in relation to product complaints (includes reaction to skin, your ethnic origin and allergies)
- Content you provide (such as photographs, videos, reviews, articles, survey responses and comments)
- Device information provided to us through the type of device you use when you visit our website and social media pages which may also include your unique device identifier, IP address, type of device or mobile operating system
- Information provided to us through social media networks when you visit our social media pages (such as your name, profile picture, likes, location, friend list and other information made publicly available by you on the social media network)

### **3. How We Use the Information**

We may use the information provided to:

- Send you promotional materials or other communications
- Provide products and services to you
- Process your payment and/or gift card transactions
- Create and manage your online account, including access to your online and in-store purchase history
- Assist with product selection
- Respond to your inquiries
- Tailor ads displayed to you on our site and elsewhere to your interests and history with us
- Communicate with you about, and administer your participation in, special events, contests, sweepstakes, surveys and other offers
- Operate and communicate with you about our social networking applications
- Operate, evaluate and improve our business (including developing new products and services improving our current products and services; managing our communications; analyzing our products; performing data analytics; and performing accounting, auditing and other internal functions)
- Protect our systems and infrastructure from security risks
- Comply with applicable legal requirements, relevant industry standards and our policies
- If we use your information in ways not mentioned here, we will let you know in advance.

### **5. Technologies We Use**

#### **5.1. Cookies, Web Server Logs and Web Beacons**

Cookies are small text files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings in your browser. Your browser may tell you how to be notified when you receive certain types of cookies and how to restrict or disable certain cookies. Please note,

however, that without cookies you may not be able to use all of the features of our websites.

In conjunction with obtaining information through cookies, our web servers may log details such as your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone in which your device is located. The web server logs also may record information such as the address of the web page that linked you to our site and the IP address of the device you use to connect to the Internet.

To control which web servers collect this information, we may place tags on our webpages called "web beacons." These are computer instructions that link web pages to particular web servers and their cookies.

### **5.2. Third Party Web Analytics Services**

We may use third party web analytics services on our websites such as Google Analytics. The service providers that administer these services use technologies such as cookies, web server logs and web beacons to help us analyze how visitors use the site. The information collected through these means (including IP address) is anonymized before being shared with these service providers, who use the information to evaluate use of the websites. You may deactivate the ability of these analytics services to analyze your browsing activities on this site.

### **5.3. Targeted Advertising**

We also may contract with third-party advertising networks that collect IP addresses and other information through the use of cookies, web server logs and web beacons on our websites and emails; on third-party websites and emails; and on our advertising placed on third-party websites. They use this information to provide advertisements about products and services tailored to your interests (including for companies not affiliated with us). You may see these advertisements on our websites and other websites. This process also helps us manage and track the effectiveness of our marketing efforts.

## **6. How We Use the Information Collected by Automated Means**

We may use the information collected through automated means on this site for market research, data analytics and system administration purposes, such as to determine whether you have visited us before or are new to the site, to tailor ads displayed to you on our site and elsewhere and for compliance with our legal obligations, policies and procedures, including compliance with relevant industry standards. We also may use the information in other ways for which notice is provided at or before the time of collection.

## **7. California Privacy Rights**

### **7.1. California "Shine the Light" Law**

If you reside in California, you have the right to ask us one time each year if we have

shared information with any third parties for their direct marketing purposes. To make such a request, please contact us as described below. In your correspondence, please confirm that you are a California resident making a "California Shine the Light" inquiry.

## 7.2. California Consumer Privacy Act

If you reside in California, you have the following rights:

- You have the right to opt-out of any sale by us of your personal information
- You have the right to request the deletion of your personal information
- You have the right to request us to disclose to you the following, no more than twice in a 12-month period:
  - Categories of personal information we collected about you during the preceding 12 months
  - Categories of sources from which we collected the personal information during the preceding 12 months
  - Business or commercial purpose for collecting or selling your personal information during the preceding 12 months
  - Categories of third parties with whom we shared the personal information during the preceding 12 months
  - Specific pieces of personal information we collected about you during the preceding 12 months
- You have the right to request us to disclose to you the following, no more than twice in a 12-month period:
  - Categories of personal information we collected about you during the preceding 12 months
  - Categories of information we have sold and categories of third parties to whom the information was sold during the preceding 12 months
  - Categories of information we disclosed about you for a business purpose during the preceding 12 months
- We will not discriminate against you because you exercised your rights under this section of this Policy.
- For a listing of the categories of personal information we have collected about California residents in the preceding 12 months, the categories of sources from which that personal information was collected, the business or commercial purposes for which we collected the personal information, and the categories of third parties with whom we share such personal information or to whom we sell or disclose such personal information for a business or commercial purpose, please see Sections 1 through 6 and 8 of this MAKE WELLNESS Privacy Policy.

To exercise the rights described above, you must submit a verifiable consumer request to us by contacting us at the as described below and providing the requested information.

To submit a verifiable consumer request, you will be asked to provide certain

information to help us verify your identity. The information we ask you to provide to initiate a request may differ depending upon the type of request, the type, sensitivity and value of the personal information that is the subject of the request, and the risk of harm to you that may occur as a result of unauthorized access or deletion, among other factors. We may also require you to provide a written declaration that you are who you say you are. If we cannot verify your identity, we will not be able to comply with your request. We will inform you if we cannot verify your identity.

### **7.3. Do Not Track**

Under California law, website and online service operators are also required to disclose how they respond to web browser "do not track" signals or other similar mechanisms that provide consumers the ability to exercise choice regarding the collection of information about a consumer's online activities over time and across third-party websites. We currently do not change our tracking practices in response to "do-not-track" signals or other similar mechanisms.

### **7.4. Third Party Collection**

California law also requires website and online service operators to disclose whether third parties may collect information about their users' online activities over time and across different sites when the users use the operator's website or service. Third parties that have content or services on our site such as a social feature, analytics service, or an advertising network partner, may obtain information about your browsing or usage habits while you visit our website and while you visit third party websites that use the same content or services.

## **8. Information We Share**

We do not rent lists or sell or otherwise disclose information we collect about you, except as described here. We may share your information with:

### **Our Affiliated Legal Entities**

Third party service providers who perform services on our behalf based on our instructions. We do not authorize these service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements. Examples of these service providers include entities that process credit card payments, fulfill orders and provide web hosting, advertising and marketing services

In addition, and notwithstanding any other provision herein, we may retain and disclose information about you (a) if we are required to do so by law or legal process; (b) to law enforcement authorities or other government officials; or (c) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

We also reserve the right to transfer information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use information you have provided to us in a manner that is consistent with this Policy. Following such a

sale or transfer, you may contact the entity to which we transferred your information with any inquiries concerning the processing of that information.

## **9. Your Rights and Choices**

We offer you certain choices in connection with the information we collect from you, such as how we use the information and how we communicate with you. To update your preferences, please contact us in the manner specified below.

### **9.1. Email Opt-Out**

You can at any time tell us not to send you marketing communications by email by clicking on the unsubscribe link within the marketing emails you receive from us or by contacting us as indicated below.

### **9.2. Social Networking Application Opt-Out**

To remove or delete our social media applications from your social networking account, follow the instructions from the particular social network.

### **9.3. Withdrawing Consent**

You may withdraw any consent you previously provided to us, or object at any time on legitimate grounds, to the processing of your information. We will apply your preferences going forward. In some circumstances, withdrawing your consent to our use or disclosure of your information will mean that you cannot take advantage of some of our products or services. To withdraw your consent, please contact us.

### **9.4. Reviewing, Updating and Modifying Information**

Subject to applicable laws, no more than twice in a 12 month period you may have the right to request access to and receive details about the information we maintain about you, update and correct inaccuracies in your personal data, and have the information blocked or deleted, as appropriate. The right to access information may be limited in some circumstances by local law requirements. We may take reasonable steps to verify your identity before granting access or making corrections. You may request to review, change or delete your information by contacting us in the manner specified below. You may also ask to see what information we hold about you and be provided with:

- A copy of the personal information
- Details of the purpose for which the personal information is being or is to be processed;
- Details of the recipients or classes of recipients to whom the personal information is or may be disclosed, including if they are overseas and what protections are used for those overseas transfers
- The period for which the personal information is held (or the criteria we use to determine how long it is held)
- Any information available about the source of that information
- Whether we carry out any automated decision-making, or profiling, and where we do, information about the logic involved and the envisaged outcome or consequences of that decision or profiling.

### 9.5. Objecting to processing

You may object to us processing your personal information where you believe that your rights override our interests in the processing of your information.

### 9.6. Request for erasure

You may ask us to erase your information where:

- You do not believe that we need your information in order to process it for the purposes set out in this Policy
- If you had given us consent to process your information, you withdraw that consent and we cannot otherwise legally process your information
- You object to our processing and we do not have any legitimate interests that mean we can continue to process your information
- Your information has been processed unlawfully or has not been erased when it should have been

Please be aware that these rights may not apply in all cases. For example, we do not have to erase your information if we need to use that information for a legal process that we are involved in.

## 10. Data Transfers

We may transfer the information we collect about you to jurisdictions other than the jurisdiction in which the information was originally collected and your information may be processed and stored outside of your jurisdiction of residence. Those jurisdictions may not have the same data protection laws as your jurisdiction of residence and your information may be subject to applicable foreign laws. If we transfer your information to other jurisdictions, we will protect that information in the manner described in this Policy.

## 11. Children's Privacy

Our websites are not directed to children under the age of sixteen and we do not knowingly collect information from children under the age of sixteen on our websites. If we become aware that we have inadvertently received information from a visitor under the age of sixteen on a website, we will delete the information from our records.

## 12. How We Protect Information

We maintain appropriate administrative, technical and physical safeguards designed to protect the information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. However, no security system is perfect and we cannot promise that information about you will remain secure in all circumstances, including the security of your data during transmission to us.

## 13. Storage of Information

MAKE WELLNESS is based in United States of America and operates an international retail and online business. As a result, your information may be transferred to, stored at or processed in other countries, including United States, Australia, Germany, France, Hong Kong and United Kingdom and other countries which may not have equivalent privacy or data protection laws. However, regardless of where your

information is transferred, we will protect it in accordance with this Policy and applicable law.

#### **14. Information Security and Data Retention**

We use physical, technical, organizational and administrative safeguards to help protect your information from unauthorized access or loss. For example, we use technology like encryption to protect sensitive information (such as your name and address) during transmission. We will retain your information for as long as the information is needed for the purposes listed herein and for any additional period that may be required or permitted by law.

#### **15. Access and Correction**

We comply with all applicable laws regarding access and correction of information. You may contact us by using the information in the section "Contact Us" to update the information you have provided to us, general enquiries or if you have any questions on this Policy and how MAKE WELLNESS processes your personal information.

##### **User Submitted Content**

Users may be able to submit reviews, content and other information and materials that users have created through our website and through third party social media platforms. ANY OPINIONS EXPRESSED IN ANY SUCH USER SUBMITTED CONTENT ARE SOLELY THOSE OF THE USERS THAT SUBMITTED THE CONTENT AND DO NOT NECESSARILY REFLECT THE OPINIONS, POLICY OR POSITION OF MAKE WELLNESS. YOU ASSUME ALL RISKS ASSOCIATED WITH YOUR SUCH CONTENT, INCLUDING, BUT NOT LIMITED TO, ANY THIRD PARTY'S RELIANCE ON ITS QUALITY, ACCURACY, OR RELIABILITY, OR ANY DISCLOSURE OF INFORMATION IN YOUR USER CONTENT THAT MAKES YOU OR OTHERS PERSONALLY IDENTIFIABLE. YOU HEREBY AGREE THAT MAKE WELLNESS HAS NO RESPONSIBILITY OR LIABILITY WHATSOEVER FOR ANY SUCH ACTIVITIES. YOU ALSO AGREE AND UNDERSTAND THAT YOUR USER CONTENT IS NOT SPONSORED OR ENDORSED BY MAKE WELLNESS, AND YOU WILL NOT IMPLY THAT YOUR USER CONTENT IS IN ANY WAY SPONSORED OR ENDORSED BY MAKE WELLNESS.

#### **16. Third Party Websites**

Our Website(s) may contain links to other third party websites. These other websites may have their own privacy policies and terms and conditions that are not governed by this Policy. We are not responsible for the privacy practices or the content of any website(s) owned and operated by any such third parties. Other websites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy for each website you visit. Any links from this Website to other websites, or references to products, services or publications other than those of MAKE WELLNESS, do not imply the endorsement or approval of such websites, products, services or publications by MAKE WELLNESS.

#### **17. Updates To Our Privacy Policy**

This Policy may be updated periodically and without prior notice to you to reflect changes in our information practices. We will post a prominent notice on our website



to notify you of any significant changes to this Policy and indicate at the top of the Policy when it was most recently updated.

**18. Contact Us**

To contact us in relation information you have provided to us, to send us general enquiries, to contact us in relation to this Policy and how MAKE WELLNESS processes your personal information, or if you have any questions on your and any privacy issues concerning MAKE WELLNESS you may contact us via our website or postal mail as follows: