

Thank you for visiting Upnomix' global website. As used in this Privacy Policy, the terms "our," "we" and "us" refer to Upnomix, unless the context clearly provides otherwise.

We appreciate the opportunity to interact with you on the Internet and are committed to protecting and safeguarding your privacy. The purpose of this Privacy Policy is to inform you about the types of information we might collect about you when you visit our site, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of, and your ability to correct, that information.

Ensuring the security of the personal information you submit is a priority of Upnomix. Our Privacy Policy was developed as an extension of our commitment to combine quality services with integrity in dealing with our users and reflects our commitment to your privacy and security.

By using our web site, you consent to the collection and use of information by Upnomix as described in this Privacy Policy.

What Information We Collect and How We Use It Any information we collect on our site generally falls into the following two categories: Personally, Identifiable Information or Aggregate Information.

## **Area Of Applicability**

Upnomix complies with all applicable laws and rules, in the manner in which it collects, accesses, uses, stores, discloses, transfers, protects data.

As we continue to develop our website to improve our services, we may need to amend and revise this Privacy Policy. You should regularly visit this section to find out whether this Privacy Policy has been modified and keep yourself apprised with the updates. In case the modification concerns how Upnomix will collect and use your information (including your personal data), we will ask for your consent prior to any modified use, by sending an email at the email address provided by you.

## **Personal Information**

The Upnomix Site collects different types of personally identifiable information (PII) such as name, address, email address and phone number.

We send you push notifications from time-to-time to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you may turn them off at the browser level. To ensure you receive proper notifications, we will need to collect certain information about your browser, such as operating system and user identification information.

In order to tailor our subsequent communications to you and continuously improve our services, we may also ask you to voluntarily provide us with information regarding your personal or professional interests, demographics, experience with our services, and contact preferences.

Generally, you can visit the Upnomix Site without entering any PII. However, if you choose to place an order on the Upnomix Site, we require that you provide your name, mailing address, billing address, email address, phone number, and payment details. All of this information is necessary for us to complete the transaction and notify you of your order status.

For distributors, the purpose of the Upnomix Site is to manage your distributorship, and network of distributors. In order to use the back-office of the website, you must have a Distributor Login provided by Upnomix.

When enrolling to become an UPNOMIX distributor through the website, we collect your PII, including your name, home or business address, telephone numbers, email address, IP address, bank account information (for direct deposit), and various government-issued identifying data, including, but not limited to, your passport number, tax identification number, national ID card number, etc. We may also collect scanned copies of government-issued photo ID's. This data is necessary to manage your UPNOMIX distributorship for purposes of identifying who you are, placement of your distributorship and downline distributorships in the tree, compliance management, recognition and rewards, and commissions calculations and payment.

We permit your upline to see only the following PII: your name, the country in which you are registered, your user name, and your sponsor's name. We permit your sponsor to see your name, email address and phone number. If you choose to use a replicated website, we will display the PII that you expressly choose: name, site URL, phone number, email address. We also collect third party personal information from customers, including their name, address, telephone number, email address.

### **Non-Personally Identifiable Information Collected Automatically**

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, domain type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

### **Supplementation Of Information**

In order to protect your account, we may, on occasion, supplement the personal information you submitted to us with information from third-party sources.

We use services from leaders in the industry to verify your identity, in order to prevent others from defrauding your account or the company.

## **Testimonials/Reviews**

If you provide a testimonial or a review on the Upnomix Site, you should be aware that any personal information you submit can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. For testimonials, we do obtain the customer's consent prior to posting his or her name and testimonial.

If you enter a comment in a public forum, we are not responsible for the personal information you choose to submit in these comments. If you want to remove your personal information that is being displayed on the Upnomix Site under public pages, please contact us at [compliance@upnomix.com](mailto:compliance@upnomix.com).

## **How We Use Your Information**

We may use your email address, mailing address and/or phone number to provide quality customer support or to reach you regarding account status, and other customer service related activities. We may use your email address, mailing address and/or phone number to contact you regarding new offerings, special sales, newsletters, market research, and enforcement of the distributor contract and other aspects of your use of the Upnomix Site.

If, however, you do not wish to receive such communications, you have the ability to "opt-out" at any time, and you will not be contacted further unless you place a service order. In that case, we will send you an order confirmation.

## **Surveys & Contests**

Our site may request information from you via surveys or contests. Participation in these surveys or contests is completely voluntary, and you, therefore, have a choice whether or not to disclose this information. Information requested may include contact information (such as name and address), demographic information (such as zip code and age), photos and other personal information. Contact information will be used to notify the winners and award prizes.

Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site and for our internal marketing research purposes.

## **Updating Your Personal Information**

Preferred customers and distributors can update or correct their personal information at any time by visiting the "My Profile" section of the Upnomix Site.

If you wish to access, delete or correct your information, please fill out a help desk ticket through your back-office or contact us by email. Requests for access will be responded to within 30 days of the request.

## **Children's Privacy Protection**

We take special care to protect the privacy needs of children and encourage parents to be an active participant in their child's online activities. Our site does not target and is not intended for children under the age of 18, and we will not knowingly collect Personally Identifiable Information from them. If we discover personal data from a child through our site, we will eliminate that data. You must be at least 18 years old as a customer to be on our site.

## **Use Of Cookies On This Site**

A "cookie" is a small data file transferred to your computer's hard drive that allows a Web site to respond to you as an individual, gathering and remembering information about your preferences in order to tailor its operation to your needs, likes and dislikes. Cookies also enable an Internet retailer like Upnomix to keep track of a consumer's electronic "shopping cart" before completing a purchase. Overall, cookies are safe, as they only identify your computer to customize your Web experience. Accepting a cookie does not provide us with access to your computer or any Personally Identifiable Information about you, other than the information you choose to share. Other servers cannot read them, nor can they be used to deliver a virus.

Most browsers automatically accept cookies, but you can usually adjust yours (i.e. Microsoft Internet Explorer, Firefox, Safari, or Google Chrome) to notify you of cookie placement requests, refuse certain cookies, or decline cookies completely. If you turn off cookies completely, there may be some features of the site that will not be available to you, and some Web pages may not display correctly.

To support the personalized features of our site (such as your country and language codes, electronic shopping cart, and other ordering and browsing functions), we must send a cookie to your computer's hard drive and/or use cookie-based authentication to identify you as a registered Site user. We do not, however, use so-called "surveillance" cookies that track your activity elsewhere on the Web.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **Flash Cookies**

We do not use Flash cookies to collect and store information.

## **Sessions**

Sessions are encrypted and enable us to save personal information about you on our server temporarily. The most basic session information includes data about your cart. Each time you log in, a new session is created pulling your data from UPNOMIX's database. This saves you time, as you will not have to re-input your Personal Information each time you visit us. Upnomix uses sessions, rather than cookies, as an enhanced security measure.

We may use your IP address to identify and verify secure logins, help diagnose problems with our servers, and to administer our website. Your IP address also may be used to gather broad demographic information and to recognize customer traffic patterns and site usage. This information aids us in merchandising and in developing the design and layout of the site.

## **Third-Party Analytics Services**

We use third-party web analytics services on the Site, including Google Analytics and Facebook Pixel. These service providers use automated technologies to collect data (such as IP addresses) to evaluate the use of the Sites.

To learn more about Google Analytics and how to opt-out, please visit <https://www.google.com/intl/en/analytics/learn/privacy> .

To learn more about Facebook Pixel and how to opt-out, please visit [https://www.facebook.com/help/164968693837950?helpref=faq\\_content](https://www.facebook.com/help/164968693837950?helpref=faq_content).

## **Clear Gifs (Web Beacons/Web Bugs)**

We may employ a software technology called clear gifs (aka Web Beacons/Web Bugs), that help us better manage content on our site by informing us what content is effective.

Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of Web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on Web pages and are about the size of the period at the end of this sentence.

We do not tie the information gathered by clear gifs to our customers' personal information. We may use clear gifs in our HTML-based emails to let us know which emails have been opened by recipients.

This allows us to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns. If you would like to opt-out of these emails, please see "How We Use Your Information."

## **Do Not Track**

Web browsers may allow you to send "Do Not Track" requests. We do not currently take actions to respond to Do Not Track signals because there is no current industry standard concerning what, if anything, websites should do when they receive such signals. We continue to review new technologies and may adopt a standard if and when one is created.

## **Social Media Widgets**

Our Website includes social media features, such as the Facebook Like button and widgets, such as the Share This button or interactive mini-programs that run on our site.

These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function correctly.

Social media features and widgets are either hosted by a third party or hosted directly on our web site.

Your interactions with these features are governed by the privacy policy of the company providing it.

## **Links To Others Web Sites**

Links to third-party Web sites may be provided solely for your information and convenience, or to provide additional shopping for various other services through our Merchant and Services Partners. If you use these links, you will leave our site.

This Privacy Policy does not cover the information practices of those Web sites linked to our site, nor do we control their content or privacy policies. We suggest that you carefully review the privacy policies of each site you visit.

We maintain contractual agreements with all of our Merchant and Services Partners, which require them to observe the intent of this Privacy Policy.

## **Information Sharing And Choice**

Upnomix is not an "information broker".

We do not engage in the selling of the profile, contact, web usage habits, behaviour, buying patterns, or demographic information of our customers, partners or users. We use the information we collect about you to process orders, pay commissions and provide the best and most personalized service possible.

We will not use or share the PII provided to us online in ways unrelated to the ones described above without first letting you know and offering you a choice. We will also provide you with the opportunity to let us know if you do not wish to receive unsolicited direct marketing materials from us, and we will do everything we can to honour such requests.

## **Use Of Third-Party Media And Research Companies**

Our site may run limited third-party ads only for those Merchant and Services Partners with whom we link. Besides, we may use third-party media and research companies to place ads for us on other parties' Web sites.

## **Business Transition**

In the event Upnomix goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personal information will likely be among the assets transferred.

You will be notified via email and/or a prominent notice on our website of any such change in ownership or control of your personal information, as well as any choices you may have regarding your personal information.

## **International Transfers**

The site is headquartered in the Asia Pacific region. Please be aware that information you provide to us or that we obtain as a result of your use of the site may be collected in your country and subsequently transferred to another country in accordance with applicable law. Using the site demonstrates your consent to the processing of information as described in this Policy.

## **Data Retention**

We will retain your information for as long as your account is active, as needed to provide you services and will use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions and personally identifiable information will be encrypted using SSL technology.

We take reasonable steps to ensure that the personal information we collect about you remains accurate, timely and secure. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure, and while we strive to protect your personal information, we cannot guarantee or warrant its complete security.

## **Legal Disclaimer**

In addition to the circumstances described above, Upnomix may disclose or release information when we, in good faith, believe that doing so is reasonably necessary: (i) to comply with the law, judicial proceeding, court order, or legal process served on our Web site; (ii) to enforce or apply the terms of User Agreement; or (iii) to protect the rights, property or safety of Upnomix Site, our users, or others.

## **Changes To This Policy**

Any updates or changes to the terms of this Privacy Policy will be posted here on our site, and the date of the newest version posted below.

Please check back frequently, especially before you submit any Personally Identifiable Information at our site, to see if this Privacy Policy has changed. If any changes materially affect the use of Personally Identifiable Information previously provided to us, we will obtain your consent prior to the retroactive application of any material changes. By using our site, you acknowledge acceptance of this Privacy Policy in effect at the time of use.

### **Governing Law**

This Privacy Policy will be governed in accordance with the laws of Costa Rica.

All claims, differences and disputes arising under or in connection with this Privacy Policy will be subject to *the* exclusive jurisdiction of the courts at San Jose.

### **Contact Us**

If you have any concerns about our use of your information or about this Privacy Policy, please send an email at [compliance@upnomix.com](mailto:compliance@upnomix.com).

We will make every reasonable effort to address your concerns and remedy any problems you bring to our attention.

Updated and effective March 01, 2021.