

## PRIVACY POLICY

### INTRODUCTION

The Retro Company Group LLC (“retro co.”, “we”, “us” or “our”) provides this Privacy Policy to inform you of (i) the types of information we may collect or that you may provide when accessing or using the retro co. online website application (and any other features, content or applications made available through the website from time to time by retro co.), including the official retro co. corporate website, Independent Consultant (“Consultant”) personal websites, Consultant-only portion of the websites, known as the “Back-Office”, and any other websites or mobile application under the control of retro co. however accessed (together, the “Website”) and (ii) your choices about the collection and use of your information.

By visiting this Website and providing information to retro co. you consent to the Privacy Policy, use and disclosure of information. If you do not agree with our policies and practices, please do not access or use the Website. This Privacy Policy only governs information collected on the Website. Please remember that when you use a link to go from our Website to another website or service, our Privacy Policy does not apply to those third-party websites or services. This Privacy Policy is incorporated into our Terms of Use. All capitalized terms not defined in this Privacy Policy have the meaning set forth in the Terms of Use.

We may revise and change this Privacy Policy from time to time at our sole discretion. All changes are effective thirty (30) days after publication of notice is posted, and apply to all access to and use of the Website thereafter. Amendments shall not apply retroactively to conduct that occurred prior to the effective date of the amendment. Your continued use of the Website following the effective date of an amendment means that you accept and agree to the changes. You are expected to check this page from time to time so you are aware of any changes, as they are binding on you.

Retro co. is based in the United States. If you decide to use the Website, your personally identifiable information may be transferred to the United States, and processed according to the terms described in this Privacy Policy. The laws in the United States may not be considered adequate by authorities in your home country. If you prefer not to have your personally identifiable information transferred to the United States, don’t use this Website. Otherwise, by using this Website, you expressly consent and authorize retro co. to transfer your personally identifiable information to destinations outside your home country as we see necessary to run our business, and process it according to the terms of this Privacy Policy.

### USER ACKNOWLEDGEMENT

By visiting, accessing or using the Website, you acknowledge that:

- You have read and accept the practices and policies described in this Privacy Policy.
- You have read and agree to be bound by our Terms of Use.
- You are over 13 years of age. (This Website is not targeted towards children under the age of 13, nor do we knowingly collect information about children under the age of 13.

### INFORMATION WE COLLECT AND HOW WE COLLECT IT

In order to provide the Website to you and improve your experience as described below, we may collect the following types of information:

**Automatic Information Collection and Data Analytics:** When you download, register or use the Website, we may use third-party analytics technology to help us understand how our Website is being used and to measure traffic and usage trends for the Website. We do not control these third parties tracking technologies or how they are used. These tools may automatically collect information sent by your device or our Website and other information that assists us in improving the Website.

- Usage Information: When you download, register or use the Website, we may automatically collect certain details of your access to and use of the Website, such as traffic data, location data, logs and other communication data and the resources that you access and use on through the Website. We may also collect similar information from emails sent to our users which then help us track which emails are opened

and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Website.

- **Device Information:** When you download, register or use the Website, we may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type and mobile network information.
- **Cookies and Similar Technologies:** When you download, register or use the Website, we may use cookies and similar technologies like pixels, web beacons, and local storage to collect information about how you use retro co. and provide features to you. We may ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or a third-party. Your browser may give you the ability to control cookies. How you do so, however, depends on your browser and the type of cookie. Certain browsers can be set to reject all browser cookies. If you configure your computer to block all cookies, you may disrupt certain web page features, and limit the functionality we can provide when you visit or use our Website. If you block or delete cookies, not all of the tracking that we have described in this policy will stop.
- **Metadata:** Metadata is usually technical data that is associated with user content. For example, Metadata can describe how, when and by whom a piece of user content was collected and how that content is formatted.
- **Device Identifiers:** Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may deliver information to us or to a third party partner about how you browse and use the Website and may help us or others provide reports or personalized content and ads.

**Information You Choose to Provide to Us:** We don't require you to give us personally identifiable information to access certain public areas of our Website. This is true unless you live in a country that defines personally identifiable information to include network identifiers like your Internet Protocol addresses. For some secure areas of our Website, however, we require you to provide personally identifiable information when you use specific features. Personally identifiable information is any piece of information that can potentially be used to uniquely identify, contact, or locate a single person including names, addresses, email addresses, telephone numbers, social security and tax identification numbers, and credit card or banking information.

For example, we collect personally identifiable information from you when you: (i) become a Consultant or customer, (ii) sign up for newsletters, (iii) purchase our products, (iv) participate in promotions or surveys, (v) submit comments, reviews, or other user-generated content, (vi) connect or interact with us through social networks, (vii) request customer or technical support. Additionally, for quality and training purposes or for our own protection, we may monitor or record our telephone conversations with you or anyone acting on your behalf. By communicating with retro co., you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning. If you can't or choose not to provide us with the personally identifiable information we reasonably require, we may be unable to provide you with the information or services you have requested.

## **COMMUNICATIONS FROM US**

We may communicate with you via email, regular mail, text message and telephone to provide requested services and in regards to issues relating to your retro co. business, including for marketing purposes. You hereby consent to receive text messages from or on behalf of retro co. at the mobile phone number you provided to us. You agree that we may contact you at that number using autodialed or prerecorded calls or text messages. You do not have to agree to receive autodialed or prerecorded calls or texts to your mobile phone number in order to use and enjoy the products and services offered by us. You can decline to receive autodialed or prerecorded calls or texts to your mobile phone number in several ways, including by contacting [guidelines@theretrocompany.com](mailto:guidelines@theretrocompany.com), by contacting us at (844) 49RETRO or by texting the word STOP from the mobile device receiving the messages. Standard telephone minute and text charges may apply.

## **INFORMATION USE AND SHARING**

As a direct sales company, retro co. provides certain personally identifiable information to Consultants regarding other Consultants and customers enrolled in a Consultant's downline marketing organization and, in some instances, to Beauty Guides to customize and personalize product and service offerings. If you make a purchase from a Consultant's personal Website, we will provide the Consultant to whom this personal website is assigned with certain personally identifiable information. If you engage with a Beauty Guide, we will provide the Beauty Guide with whom you engage with certain personally identifiable information and the Beauty Guide may collect certain personally identifiable information with your consent. Personally identifiable information made available to Consultants and Beauty Guides as discussed above are subject to a confidentiality provision in the agreement that each Consultant or Beauty Guide enters into with retro co. However retro co. does not warrant that other Consultants or Beauty Guides will adhere to the confidentiality covenant, and retro co. shall not be responsible for a Consultant or Beauty Guide's violation of this covenant.

Apart from your Consultant, upline enroller or, if applicable, Beauty Guide, we will not provide your personally identifiable information to third parties for use in marketing third-party products or services to you without your consent. Whatever the purpose may be – whether we share with service providers or other external entities – we only process and share your personally identifiable information to the extent reasonably necessary to fulfill your requests and our legitimate business objectives. When we disclose personally identifiable information to external entities to perform support services for us, they may access your personally identifiable information only for the purposes of performing those support services. We may also use what we know about you to offer you other products and services. We may combine your online information with information collected from offline or online sources, or information we already have. We may also use and disclose certain personally identifiable information to our corporate affiliates and others for any purpose allowed by law.

We process and may disclose your personally identifiable information to others to:

**Authorized Service Providers:** We use other companies and individuals to perform certain functions on our behalf. Those functions include payment card processors, shipping vendors, call-center support, analyzing or hosting data on cloud-based servers, and other companies that help us improve our products and services. We may disclose your personally identifiable information to these companies and other individuals performing services in the United States or other locations where retro co. conducts business.

**Aggregate Information (non-personally identifiable):** Retro co. may share aggregated demographic information with our partners, vendors, suppliers, third party providers and advertisers. This is not linked to any personally identifiable information.

**Business Transactions:** In the event retro co. goes through a business transaction, such as being acquired by another company, or selling all or part of its assets, the personally identifiable information of Consultants and customers may be part of the assets transferred. In such a case your personally identifiable information will be subject to the privacy policy of the entity that acquires retro co.

**Lead Assignment and Consultant Locator Features:** Retro co. occasionally will assign prospective sales and new Consultant leads to Consultants. In these cases, we will provide the lead with the appropriate Consultant's name and contact information and/or provide a Consultant with the prospective lead's name and contact information.

**Responding to Legal Requests and Avoiding Harm:** Retro co. will provide confidential and personally identifiable information when we believe in good faith that release is necessary to comply with judicial and administrative orders, subpoenas, civil or criminal investigative demands, administrative and regulatory demands and other legal obligations or protect the rights, property, or safety of retro co., our employees, our users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. In order for retro co. to conduct business in certain jurisdictions, retro co. may be called upon to disclose certain personally identifiable and confidential information to regulatory authorities in those jurisdictions. Such information may include, but is not limited to, income information and personally identifiable information. We will provide such information, as we deem necessary.

**Surveys:** It may become necessary to conduct surveys of our customers or Consultants. Should we deem it necessary to conduct a survey, we may outsource the survey to a third party. We will provide the third party survey company with your personally identifiable information as is necessary for the third party survey company to conduct the survey and to those third parties whom we engage to review and analyze the results of the survey. We will not provide your social security number, credit card or banking information to the survey provider.

**Your Permission:** We may also disclose personally identifiable information with your permission.

## **DO WE ADVERTISE ONLINE?**

We advertise in a number of ways, including online through managed social media presences, and on other unaffiliated sites and mobile applications. To understand how our advertising campaigns are performing, we may collect certain information via our Website through our advertising service providers. We also use certain information to: (i) present tailored ads, (ii) identify new visitors to the Website; (iii) recognize returning visitors; (iv) advertise on other websites and mobile applications not affiliated with us; (v) analyze the effectiveness of our advertisements; (vi) better understand our audience, customers, or other Website visitors; (vii) determine whether you might be interested in new products or services, (viii) respond to your questions, complaints, or reviews of our product or services; (ix) administer contests, promotions, or surveys; (x) send you communications about online transactions, product information, ads and promotions, electronic newsletters, or other notices or offers tailored to you; (xi) enable our advertisers to provide you with more personalized content, and track the effectiveness of certain advertising campaigns; (xii) comply with applicable law, obey judicial orders, cooperate with law enforcement authorities, or prevent any suspected illegal activities; (xiii) help us run our business; or (xiv) for any other everyday business purposes, such as product development and Website administration.

## **HOW WE STORE AND PROTECT YOUR INFORMATION**

### **Storage and Processing:**

- Your information is transmitted to and stored by retro co. using commercially reasonable steps and industry-standard methods for each type of information. Our databases and servers are protected from unauthorized access using modern security and authentication methods such as passwords and access keys. However, retro co. cannot ensure the security of any information you transmit to retro co. or guarantee that information on the Website may not be accessed, disclosed, altered, or destroyed.
- Per our Terms of Use, you are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and retro co., at all times.
- The Website contains links to third party websites and mobile applications. We are not responsible for the functionality, privacy, or security measures of any other organization. This Privacy Policy only governs information collected on the Website. Please remember that when you use a link to go from our Website to another website or service, our Privacy Policy does not apply to those third-party websites or services.

## **YOUR CHOICES ABOUT YOUR INFORMATION**

We will not use or share your information for any purpose other than those described in this Privacy Policy without your explicit consent. Even when using your information for the purposes described in this Privacy Policy, we strive to give you control in the following ways. If you do not wish to have your personally identifiable information used or shared as described in this Privacy Policy, please discontinue use of the Website or do not provide such information.

- You can access, view, update or change your information at any time by logging in and changing your profile settings.
- Unsubscribe from email communications from us by clicking on the “unsubscribe link” provided in such communications.

- Most browsers have an option for turning off cookies altogether, which will prevent your browser from accepting new cookies, as well as allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave cookies activated however, because blocking cookies could affect certain features of the Website.
- Following termination or deactivation of your account, retro co., its affiliates, or its service providers may retain information (including your profile information) for a commercially reasonable time for backup, archival, and/or audit purposes.

### **MISCELLANEOUS**

**California Online Privacy Protection Act Compliance:** Because we value your privacy we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We therefore will not distribute your personally identifiable information to outside parties without your consent.

**Children's Online Privacy Protection Act Compliance:** We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act), we do not knowingly collect any information from anyone under 13 years of age. Our website, products and services are all directed to people who are at least 13 years old or older.

### **YOUR COMMENTS AND CONCERNS**

If you have any questions or concerns about this Privacy Policy, please contact [legal@theretrocompany.com](mailto:legal@theretrocompany.com) and we will do our best to address them.

**Last Updated on February 12, 2019**