

EU-US PRIVACY SHIELD POLICY (Updated April 11, 2018)

Network TwentyOne International, Inc. located at 7320 McGinnis Ferry Road, Suwanee, Georgia USA 30024 (“N21,” “we,” “our,” or “us”) have the following EU-US Privacy Shield Policy (“Privacy Policy”):

This Privacy Policy applies with respect to how we collect, use and disclose personal information we may receive from our affiliated entities (“EU Affiliate(s)”) with whom you contract that are located in any European Union member countries with respect to your access to and use of the n21mobile.com website (or any website or privacy notice linking to this Privacy Policy) and your use of the related mobile applications, whether accessed via computer, mobile device or other technology (collectively, the “Sites”).

This Privacy Policy does not apply to any personal information lawfully transferred to us under any European Commission approved Standard Contractual Clauses (Model Contracts) or any approved derogation.

We comply with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union members countries. We have certified that we adhere to the Privacy Shield Principles. If there is any conflict between the policies 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 page, please visit <https://www.privacyshield.gov/>

Personal Information Collection and Use

When we refer to “personal information” or “personal data” we mean any information about an individual from which that person can be identified. Per the respective EU Affiliate’s privacy policy disclosed to you when you register for any of the Sites, the EU Affiliate collects personal information that you provide directly when you conduct business with them, including via telephone, fax, email, or through your use of and interaction with the Sites; as a result, we may process or have access to this personal information for and on behalf of the EU Affiliate because we develop and maintain the Sites for the EU Affiliate. How this information is collected will depend on how you choose to use the Sites.

Specifically, the personal information requested is name, user name, email address, mailing address, mobile phone number, your IBO/ABO number, your upline or sponsor, and payment and credit card information. If the EU Affiliate collects payment information from you, like credit card numbers and

expiration dates, the EU Affiliate transmits this data directly from you to the credit card processing company to process the payment you requested.

How Your Personal Information is Used– Your personal information is processed for the following purposes so that the respective EU Affiliate with whom you contracted can:

- register you as a new customer;
- process and deliver your order including, manage payments, fees and charges, and provide customer service;
- notify you about changes to terms or privacy policy;
- generate and deliver sales and activity reports;
- enable you to partake in a prize draw, competition or complete a survey;
- administer and protect the Sites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising;
- use data analytics to improve the Sites, products/services, marketing, customer relationships and experiences; and
- make suggestions and recommendations about goods or services that may be of interest to you.

Cookies, Web Beacons and Analytics Services

As you interact with the Sites we develop and maintain for our respective EU Affiliate with whom you contracted, information is automatically collected about your visit to the Sites such as your browser and operating system information, dates and times of a particular visit and/or click path taken through the Sites, lookup information, Internet Protocol (IP) address, Media Access Control (MAC) address, and your product purchases such as media titles (and those titles you share with others) (collectively, the “Usage Data”). The Usage Data reveals which services and features you are using or accessing within the Sites (including, for example but without limitation, whether you may have accessed or downloaded audiovisual material from the Sites), as well as the device type and hardware features, country and language of download.

When you view the Site, whether from your computer, tablet or mobile device, a “cookie” is stored on the device you use to access the Sites. Cookies are used by many websites to give users access to certain functions (e.g., for security purposes, to tailor communications with you, and to facilitate and personalize your experience while navigating the Sites). The information stored in the cookie can

also be used to monitor a user's behavior on the Sites. Use of certain analytics and visit recognition software improves the use and functionality of the Sites. You can configure your browser to reject cookies by modifying your browser settings, but if your browser settings do not accept cookies, then some functions of the Sites may not operate as intended and you may not have access to all the services, features and/or promotions offered. Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies. Unlike cookies which are stored on the user's computer hard drive, web beacons are embedded invisibly on web pages (or in email). Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns. Web beacons may be used to measure the effectiveness of the Sites and advertising in certain ways, such as by counting the number of individuals who visit the Sites or open and act upon an email message. You can make some web beacons unusable by rejecting cookies.

Do Not Track Requests - Unless your browser settings are configured to make your online activities and publicly available information about your online activities (such as traffic data, including unique device identifier of the device used to access the Sites, device type used to access the Sites and its capabilities, operating system version, browser type and its capabilities, length of visits to the Sites and click path taken, lookup information and time spent on certain Sites) invisible to usages analytics tools, we do not presently have the technological capability to omit you from usage analytics to the extent your browser only sends us a "do not track" message and does not otherwise screen you from tracking without any action on our part.

Information We Receive from Third Parties

If we receive information about you from third parties, we will apply this Privacy Policy to any personal information received as required by law, unless we have disclosed otherwise.

Limited Collection and Retention

We limit the collection of your personal information covered by this Privacy Policy to information that is relevant for the purposes of our processing. We do not process such personal information in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by you. We take reasonable steps to ensure that such personal information is reliable for its intended use, accurate, complete, and current. We will only retain your personal data for as

long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your Choices.

You may opt-out of having your personal information used for direct marketing purposes. If you no longer wish to receive promotional communications, you may contact us at DPofficer@n21.com or the respective EU Affiliate by email to be removed from the lists. Be sure to include any contact information that you want removed from the promotional contacts list, including physical addresses, phone numbers, and email addresses (If you use more than one email address, send your opt-out email from each of your email addresses.) If you receive any online newsletter or similar promotional email communication, you will be given the option to “unsubscribe” from receiving further email communications. Your option not to receive promotional and marketing material will not preclude correspondence by email or otherwise, regarding your existing or past business relationships with the respective EU Affiliate (e.g., any purchase of products or use of services or responses to requests for information you pose either through use of the Sites or by other means).

If personal information covered by this Privacy Policy is to be used by us for a new purpose that is materially different from that for which the personal information was originally collected or later authorized, or will be disclosed by us to a non-agent third party, then we will provide you with an opportunity to choose whether to have that personal information so used or disclosed. Requests to opt out of such uses or disclosures of personal information should be sent to:

DPofficer@n21.com.

You may choose not to provide certain personal information when using the Sites, but please be aware that you may be prevented from making full use of the Sites features, services and/or promotions offered. For example, your name and email address would be necessary to add you to an email newsletter list. Your home address, cell phone or telephone number may be necessary to deliver physical products or notify you of special offers.

Accountability For Onward Transfers

In the event we transfer personal information covered by this Privacy Policy to a third party acting as a controller, we will do so consistent with any notice provided to you and any applicable consent you have given, and only if the third party has given us contractual assurances that it will (i) process the personal information for limited and specified purposes consistent with any consent provided by the you, (ii) provide at least the same level of protection as is required by the Privacy Shield Principles and notify us if it makes a determination that it cannot do so; and (iii) cease processing of the personal information or take other reasonable and appropriate steps to remediate if it makes such a determination. If we have knowledge that a third party acting as a controller is processing personal information covered by this Privacy Policy in a way that is contrary to the Privacy Shield Principles, we will take reasonable steps to prevent or stop such processing.

We may transfer your personal information to our third-party agents or service providers who perform functions on our behalf including to protect the security and integrity of the Sites, to correct technical problems and malfunctions on the Sites, to technically process your information, to report potential violations of this Privacy Policy or other relevant privacy policies and terms of use, to provide services essential to your mobile user experience, to host and store data, or to take precautions against liability. With respect to our agents, we will transfer only the personal information covered by this Privacy Policy needed for an agent to deliver to us the requested product or service. Furthermore, we will (i) permit the agent to process such personal information only for limited and specified purposes; (ii) require the agent to provide at least the same level of privacy protection as is required by the Privacy Shield Principles; (iii) take reasonable and appropriate steps to ensure that the agent effectively processes the personal information transferred in a manner consistent with our obligations under the Privacy Shield Principles; and (iv) require the agent to notify us if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles. Upon receiving notice from an agent that it can no longer meet its obligation to provide the same level of protection as is required by the Privacy Shield Principles, we will take reasonable and appropriate steps to stop and remediate unauthorized processing.

We remain liable under the Privacy Shield Principles if an agent processes personal information covered by this Privacy Shield Policy in a manner inconsistent with the Privacy Shield Principles, except where we are not responsible for the event giving

rise to the damage.

Security and Protecting Your Privacy

We take reasonable and appropriate measures to protect personal information covered by this Privacy Policy from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, in accordance with Privacy Shield Principals. Under certain circumstances, we may be required to disclose your personal information in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

Information We Share with Others - TO THE EXTENT PERMITTED BY

LAW: We may use your personal information or disclose your personal information to third parties to protect the security and integrity of the Sites, to correct technical problems and malfunctions on the Sites, to technically process your information, to report potential violations of this Privacy Policy and the terms and conditions of use you agreed to with the respective EU Affiliate, to provide services essential to your mobile user experience, to take precautions against liability, and to enforce our legal rights and obligations. We also may provide your personal information to third parties who provide services and functions on our behalf, such as webhosting and offsite data storage providers. We reserve the right to transfer any information we have about you in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization or liquidation of our business, and disclose your personal information to third parties if we have reason to believe that disclosing such information is necessary to conduct investigations of possible breaches of law, to cooperate in any legal investigation, or to identify, contact, or bring legal action against someone who may be violating the terms of use of the Sites.

Data Protection Officer – All issues and concerns about your personal data under this Privacy Policy should be directed to our Data Protection Officer via email at **DPOfficer@n21.com** or you can write us a letter to our company address above. Also, you can contact the respective EU Affiliate with whom you contracted with for registration to the Sites; their contact details can be found in their privacy policy and their website terms of use that were previously provided to you.

Your Right to Access Your Data

In compliance with the Privacy Shield Principles, you have the right to access your personal information and to correct, amend, or delete such personal information if it is inaccurate or has been processed in violation of the Privacy Shield Principles (except when the burden or expense of providing access, correction, amendment,

or deletion would be disproportionate to the risks to your privacy, or where the rights of other persons would be violated). Requests for access, correction, amendment, or deletion should be sent to: DPOfficer@n21.com.

Independent Resolution of Complaints

In compliance with the Privacy Shield Principles, N21 commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact N21 at:

DPOfficer@n21.com

N21 has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers for more information and to file a complaint.

The United States Federal Trade Commission is the enforcement authority over our compliance with the Privacy Shield. There exists a possibility under certain conditions for individuals to invoke binding arbitration for a dispute before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission.

Links - The Sites may contain links to other sites on the Internet which are not under the control of N21. You acknowledge that we are not responsible for the accuracy or any other aspect of the content of sites we do not operate or control. Your accessing the links to any other sites is at your own risk and subject to the applicable privacy policies and terms and conditions of such websites. We encourage our users to be aware when they leave the Sites and to read the privacy statements of each website to which we may link that may collect personal information.

Children - The Sites are not intended for use by persons under the age of 18, and N21 does not knowingly solicit or collect personal information from persons under the age of 18. If we learn that we have collected the personal information from a person under 18 we will take steps to delete the information as soon as possible. If

you are under the age of 18, please do not submit your email address or any other personal information to us through the Sites.

Notification of Changes –This Privacy Policy may be amended from time to time consistent with the requirements of the Privacy Shield Principles. Appropriate notice regarding such amendments will be given.