



PRIVACY POLICY

United Kingdom

The www.vidadivina.com.com website (the “**Vida Divina Site**”) is operated by Vida Divina LLC (hereafter “**we**”, “**us**”, “**our**”, “**Vida Divina**”), Vida Divina Limited. This Privacy Policy together with the Vida Divina® Site [Terms and Conditions of Use](#) (“**Terms**”) and [Cookies Policy](#) sets out the basis on which any information or personal data we collect from users, or that you provide to us, will be processed by the Vida Divina® Site. This Privacy Policy applies to the Vida Divina® Site and all products and services offered by Vida Divina®.

The following discloses our information gathering and dissemination practices relating to the Vida Divina® Site. In order to fully understand your rights, we encourage you to read this Privacy Policy and to review our Terms. Each time you use the Vida Divina® Site you will be bound by the then current Privacy Policy and you should review this each time you use the Vida Divina® Site.

For the purpose of the Data Protection Acts, 1988 and 2003, the data controller is Vida Divina Limited with its registered office at VIDA DIVINA LIMITED 72 High Street Haslemere Surrey UK GU27 2LA

1. Acceptance Of This Privacy Statement

By using the Vida Divina® Site, you signify acceptance of this Privacy Policy. If you do not agree with or you are not comfortable with any aspect of the Privacy Policy, your only remedy is to discontinue use of the Vida Divina® Site. We reserve the right to modify this Privacy Policy at any time. Your continued use of any portion of the Vida Divina® Site following notification or posting of such changes will constitute your acceptance of those changes.

2. Information We May Collect From You

1. When you use the Vida Divina® Site, we receive and collect certain information and personal data about you, known as “**Personal Customer Information**”. The Personal Customer Information we receive and collect depends on what you do when you visit the Vida Divina® Site. We may collect and process the following Personal Customer Information about you:
 1. information that you provide to us when using the Vida Divina® Site, availing of our services or purchasing our products, such as name, birthdate, email address, billing address, shipping address, phone number and credit card information;
 2. information provided at the time of registering to use the Vida Divina® Site, posting material on the Vida Divina® Site or requesting further services;
 3. if you contact us for any reason, we may keep a record of that correspondence;



4. [we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them; and
5. details of your visits to the Vida Divina® Site including, but not limited to, traffic data, location data and other communication data and the resources, advertisements and linked sites that you access.

We use this Personal Customer Information:

1. if you are an Vida Divina® customer and have opted in for email communication we send you our product information and newsletter via email.
 2. to ensure that content from the Vida Divina® Site is presented in the most effective manner for you and for your computer;
 3. to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
 4. to deliver and organize your orders; and
 5. to notify you about changes to the Vida Divina® Site and/or services.
1. **Automatically Collected Information:** Some non-personal data is automatically received and sometimes collected from you when you visit the Vida Divina® Site. We receive and collect the name of the domain and host from which you access the Internet; the Internet protocol (IP) address of the computer you are using; the browser software you use and your operating system; the date and time you access Vida Divina® Site; and the Internet address of the website from which you linked directly to the Vida Divina® Site. We use this information to monitor the usage of the Vida Divina® Site. Also, when we send emails to you, we may be able to identify information about your email address, such as whether you can read graphic-rich HTML emails. All of the information we automatically capture provides us with the ability to enhance our customers' search and shopping experiences and to determine aggregate information about our user base and usage patterns.
 2. **Information Collected via Cookies:** For the same reason as we collect and process Automatically Collected Information, we use cookies to deliver a better and more personalized browsing and shopping experience on the Vida Divina® Site. For more information, please see our Cookies Policy.
 3. **Information Collected Using Pixel Tags or Clear GIFs:** To help us understand the effectiveness of certain of our email marketing efforts, Vida Divina® may use "message format" and "message open" sensing technologies. Both technologies



require the use of pixel tags or clear GIFs (also called web beacons). The “message format” sensing technology allows us to recognize whether you have enabled your email program to receive HTML emails; if so, this information is then associated with your email address so that subsequent messages can be sent to you in HTML format. The “message open” sensing technology allows us to recognize whether you have opened our email message. We can only detect this if you have enabled your email program to receive HTML emails.

4. **Information You Actively Submit to Vida Divina:** For most of the browsing services we provide, we neither require nor collect “Personal Customer Information” – [name, email address, billing address, shipping address, phone number and credit card information]. You can browse the Vida Divina® Site and take as much time as you want to view our products and services without having to submit such Personal Customer Information. Even when you use our shopping cart as you browse, there is no need to submit Personal Customer Information. In the following instances, however, we do need you to actively submit Personal Customer Information: (i) when you want to become an Independent Affiliate (“Affiliate”), (ii) to open a Retail Customer account; or (iii) complete a retail order.

3. How your Information is Protected

- a. **Encryption Technology.** The Personal Customer Information you provide -- including your credit card information – to establish an account with us and to make purchases from us is secured using Secure Sockets Layer (SSL) encryption technology. We use this SSL technology to prevent such information from being intercepted and read as it is transmitted over the Internet. The encrypted data goes to a secure site where your information is stored on restricted-access computers located at restricted-access sites.
- b. **Password Security.** To further secure your Personal Customer Information, we require you to create a customer password when you establish an account with us. Where we have given you or where you have chosen a password we encourage you to use a password that is not easily guessed (i.e., don’t use your name or street name). Keep your password secret; do not share it with anyone. If you forget your password, you can contact Vida Divina® Customer Service and they will send you your password or you can submit a password reset request on the login page which will send instructions to the email address under which your Vida Divina® Account is assigned. If you want to change your password or other account information, simply log in to your Back Office and click on “Update Profile”.



- c. Remember to Sign Out.** To further prevent unauthorized access to your account, remember that, after you sign in, you should sign out once you have (i) completed your transaction, (ii) completed managing your account, or (iii) decided to step away from your computer. Anyone who accesses your computer after you have signed in but before you have signed out can access your account. This is especially true if you have Express Checkout enabled on your account.
- d. Security and PCI Compliance.** We take your online security very seriously and the Vida Divina® Site has security measures in place to protect the loss, misuse and alteration of the information under our control. We have a PCI Level 1 Status and maintain physical, electronic and procedural safeguards that comply with federal regulations to guard nonpublic personal information and any other information, to ensure all customers that their privacy is a major part of our commitment to provide the finest service possible. We adopt appropriate security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on the Vida Divina® Site. However, as no data transmission over the Internet can be guaranteed as 100% secure, we cannot ensure or warrant the security of any information you transmit to us and you transfer Personal Customer Information at your own risk. We endeavor to use appropriate security measures.

4. How we Use and Share Personal Customer Information

Your Personal Customer Information will be stored on the Rackspace and Azure infrastructures and applications services in the U.S.A. Occasionally, in an anonymous manner, Vida Divina® uses Personal Customer Information to market products and services.

[If you do not want us to use your Personal Customer Information in this way, or to pass your details on to third parties for marketing purposes, please [click the relevant boxes when we collect your marketing preferences. You may change your preferences at any time by logging into your account, clicking on “Update Profile” and amend your preferences accordingly.

Vida Divina® shares Personal Customer Information that we collect as follows:

- a. Subcontractors.** We send Personal Customer Information anonymously to third-party subcontractors and agents that work on our behalf to provide certain services. These third parties do not have the right to use the Personal Customer Information beyond what is necessary to assist us or fulfill your order. They are contractually obligated to maintain the confidentiality and security of the Personal Customer Information and are restricted from using such information in any way not expressly authorized by Vida Divina®.



- b. Service Providers.** We send Personal Customer Information to third party providers of goods and services that you may purchase from time to time on our site (e.g., ISPs). Like subcontractors, these third parties do not have the right to use the Personal Customer Information beyond what is necessary to assist us. They are contractually obligated to maintain the confidentiality and security of the Personal Customer Information and are restricted from using such information in any way not expressly authorized by Vida Divina®. They are not permitted to forward information to a third party.
- c. Credit Card Companies.** Credit card transactions are handled by a third-party financial institution and their vendors, which receive the credit card number and other personal identifying information only to verify the credit card numbers and process transactions.
- d. Law Enforcement Investigations.** Vida Divina® may release Personal Customer Information if we are under a duty to disclose or share your Personal Customer Information in order to comply with any legal obligation, in order to enforce or apply our Terms and other agreements; or to protect the rights, property, or safety of Vida Divina® and its subsidiaries and its group companies, our users or others.
- e. Cross-Border Transfer.** Your Personal Customer Information may be transferred to another group company affiliated with Vida Divina® if this is necessary for the implementation of the object of the respective contract and/or for the execution of your orders or for the provision of a service. The Personal Customer Information that we collect from you may also be transferred to, and stored at, a destination outside the European Economic Area (the “EEA”). It may also be processed by third parties engaged by us who are operating outside the EEA who work for us. Such third parties may be engaged in the processing of your payment details and the provision of follow up services. By submitting your Personal Customer Information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your Personal Customer Information is treated securely and in accordance with this Privacy Policy.
- 1. Corporate Transactions.** Your Personal Customer Information may be disclosed as part of a due diligence exercise or sales process or other corporate transaction connected with any merger of [Vida Divina LLC or other group companies].



5. Your Rights

You have the right to ask us not to process your Personal Customer Information for marketing purposes. We will usually inform you if we intend to use your Personal Customer Information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by contacting Customer Service. You can also exercise the right at any time by emailing us at compliance@vidadivina.com.

6. Access to Information

You have the right to request a copy of the information held by us about you. We may charge a fee for this which will not exceed €6.35. You also have the right to have changed any inaccuracies in the details we hold about you and the right to object to the use of your Personal Customer Information and the right to block any specific uses of your Personal Customer Information in certain circumstances. To exercise any of your rights please contact us at compliance@vidadivina.com.

7. Communications from Vida Divina®

As a customer or Affiliate, you may receive the following communications from Vida Divina®: (i) Communications related to transaction and (ii) account maintenance activities. These communications include without limitation: surveys, enrollment confirmations, order confirmations; order update notices; order problem notices; and notices regarding material changes to site policies and account management procedures.

8. External Use

The Vida Divina® Site may contain links to websites operated by other companies. If you use such links, you will leave the website of Vida Divina®. Vida Divina® is not responsible for such third-party websites. The Vida Divina® Privacy Policy does not apply to websites of third parties. Please check directly on such websites how such protected how such Personal Customer Information are used.

9. Questions or comments

If you have any questions regarding your Personal Customer Information or want to have any Personal Customer Information deleted or changed, please email us at compliance@vidadivina.com. You are entitled to receive any information about your Personal Customer Information we have stored.