

HLBSUSA.COM PRIVACY POLICY

Effective Date: Sept. 1. 2020.

HLBSUSA.Com and its related services and products (“Website”) are owned and operated by HLBS Global Marketing US LLC (“HLBS”, “our”, “us”, “we”), a Texas limited liability company with its principal place of business in Marble Falls, Texas. HLBS has adopted this Privacy Policy (“Privacy Policy”) to inform you that it collects Personal Information when you use the Website and to explain how this information is used. You should contact HLBS directly with any questions or concerns.

HLBS MAY CHANGE, MODIFY, AMEND, SUSPEND, TERMINATE, OR REPLACE THIS PRIVACY POLICY FROM TIME TO TIME AND WITHIN ITS SOLE AND ABSOLUTE DISCRETION. IN THE EVENT HLBS CHANGES, MODIFIES, AMENDS, OR REPLACES THIS PRIVACY POLICY, THE EFFECTIVE DATE, LOCATED ABOVE, WILL CHANGE. YOUR CONTINUED USE OF THE WEBSITE AFTER A CHANGE IN THE EFFECTIVE DATE OF THIS PRIVACY POLICY CONSTITUTES YOUR MANIFESTATION OF ASSENT TO THE CHANGE, MODIFICATION, AMENDMENT, OR REPLACEMENT CONTAINED WITHIN.

Definitions.

- **California Consumer Privacy Act (“CCPA”)** means the California statute intended to enhance privacy rights and consumer protection for residents of California, United States.
- **General Data Protection Regulation (“GDPR”)** means the European Union (“EU”) law on data protection and privacy applicable to individuals within the EU.
- **Personal Data** means any information relating to an identified or identifiable natural person, an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Personal Information** under the CCPA means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. For purposes of this Privacy Policy, “Personal Data” is included within this definition.
- **“Weboffice”** means the account for either Customers or Members that is accessed through the Website.
- **“Customer(s)”** means a registered User that is eligible for a price discount on products purchased through the Website, but cannot earn compensation like a Member.
- **“Member(s)”** means a registered User in possession of an HLBS ID, who are eligible for a price discount, may invite others to join, and are eligible for compensation payments.
- **“User(s)”** means both Customers and Members.
- **“You / Your / You’re”** means Users.

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Types of Personal Information We Collect.

HLBS collects the following Personal Information from all Users who contact HLBS seeking more information:

- First name;
- Last name;
- Email address;
- Phone number;
- Any other information that you upload or submit to the Website directly or indirectly.

HLBS collects the following Personal Information from all Customers who create a Weboffice with the Website:

- First name;
- Last name;
- Email address;
- Phone number;
- Mailing address;
- Username;
- Password;
- Any other information that you upload or submit to the Website directly or indirectly.

HLBS collects the following Personal Information from all Members who create an Weboffice with the Website:

- First name;
- Last name;
- Email address;
- Phone number;
- Mailing address;
- Username;
- Password;
- Payment information, including credit card and/or bank information;
- Any other information that you upload or submit to the Website directly or indirectly.

In addition, HLBS collects the following Personal Information from all Users:

- Your geolocation;
- Your IP address;
- Your browser and search engine information;
- Your device information;
- Your visitor history;
- Your usage of the Website, including, without limitation, any links or items clicked or pages viewed and statistics;
- Information stored in cookies, pixel tags, or web beacons;
- Analytical data from Google Analytics and/or Google AdSense; and

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- Any other additional analytic data that you voluntarily submit to the Website.

Sources of Personal Information Collection.

HLBS may collect this Personal Information from you through various channels, including, but not limited to, through your voluntary submission of information to the Website, through requests initiated by you through the Website, through the collection and analysis of information concerning your computer and browsing activities, through the use of cookies, web beacons, pixel tags, Google Analytics, Google AdSense, and through other sources permitted by law.

Cookies & Similar Technologies.

The Website also utilizes Cookies. Cookies are small text files placed on your device to store data that can be recalled by a web server in the domain that placed the Cookie. We use Cookies and similar technologies to enable our systems to recognize your browser and to provide certain features. We also use “web beacons” to help deliver Cookies and gather usage and performance data. The Website may also include Cookies, web beacons, and other similar technologies from third-party service providers.

You have a variety of tools available to control the data collected by Cookies, web beacons, and similar technologies. For example, you can use controls in your Internet browser to limit how the websites you visit are able to use Cookies and to withdraw your consent by clearing or blocking Cookies. You can also stop HLBS from placing Cookies (other than those required for the Website to function) on your device by referencing the instructions below.

The table below sets out how we use different categories of cookies and similar technologies, as well as information on your options for managing the settings for the data collection by these technologies:

Type of Cookie	Description	Managing Settings
Required Cookies (Strictly Necessary)	Required – or strictly necessary – cookies enable you to navigate the Website and use its features.	Because required cookies are essential to operate the Website there is no option to opt out of these cookies.
Functional Cookies (Non-Strictly Necessary)	Functional – or non-strictly necessary cookies – allow us to remember information you have entered or choices you make, and provide enhanced, more personal features. We use Google Analytics to help us analyze how our Website is used, including the number of visitors, where the website visitors have come from, and the pages they visit. This information is used by us to improve our Website.	To manage the use of functional cookies on the Website, please consult your individual browser settings for cookies. Note that opting out may impact the functionality you receive when using our Website. To learn more about safeguarding your data for websites using Google Analytics, visit here . To opt of our data collection by Google Analytics, you can download and install a Google Analytics opt-out browser add-on here . To learn more about how Google Analytics Cookie Usage on Website visit here .

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		<p>You can also adjust your individual browser settings relating to cookies by visiting these pages:</p> <ul style="list-style-type: none"> • Google Chrome • Internet Explorer • Microsoft Edge • Mozilla Firefox • Safari (Desktop) • Safari (Mobile) • Android Browser <p>For other browsers not listed, please consult the documentation that your browser manufacturer provides.</p>
<p>Targeting or Advertising Cookies (Non-Strictly Necessary)</p>	<p>We use Google Webmaster Tools and Google Analytics to log when users view specific pages or take specific actions on or getting to the Website. Google Analytics specifically allows us to provide targeted advertising in the future.</p> <p>We may also use Google AdWords as a tool to acquire relevant new clients who are looking for our service and Google AdSense to show our clients other relevant advertising that may assist them while they are using our site.</p>	<p>To learn more about How Google uses cookies targeted in advertising, visit here. To adjust your Google Ad Settings and learn how to opt out of particular targeted advertising visit here or the Network Advertising Initiative opt-out page here.</p>

Lawful Basis for Processing Your Personal Information

The lawful basis for us processing your Personal Information for the uses described above will typically be because you have provided your consent; it is necessary for our contractual relationship; the processing is required for us to comply with legal obligations; and/or the processing is in our legitimate interest of providing offering a complex solution for living a healthy, quality life both from a spiritual and physical point of view; creating a program for Members to receive compensation; and offering a web shop featuring cosmetic products, nutritional supplements, coffees, and chocolates

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How HLBS Uses Your Personal Information.

We use your Personal Information based upon the legal basis of Users' consent to provide you with the Website, process any requests made by you, communicate with you, identify and fix problems with the Website, and update you regarding changes to the Website and the HLBS and third-party services offered through the Website.

By using the Website, you further authorize the following specific uses of your Personal Information:

- Enable your use of the Website and its associated services;
- Improve algorithms;
- Measure service usage;
- Develop new features;
- Contact and communicate with you, whether through email, telephone, text message, and/or messages within the Website;
- Customize and/or tailor the Website and your user experience, which may include targeted selection and display of third-party advertisements within the Website;
- Aggregate certain information that does not include your personal information and disclose it for analysis, demographic profiling and/or targeted advertising;
- Advertise products and services of HLBS;
- Transmit and process your information and actions within the Website;
- Provide statistical information, and include you in the same, where applicable;
- Provide you with technical service and support, including updates;
- Provide you with information concerning HLBS's benefits or services;
- Store, archive, retrieve, and make copies of your user generated content;
- Understand your needs and requests;
- Communicate promotions or other offers;
- Process payments;
- Prevent and detect illegal activities or violations of your General Terms & Conditions;
- Combine your personal and personally identifiable information with information from other HLBS applications and/or services; and
- Facilitate your use of the Website and upgrades/replacements to the Website.

Sharing of Your Personal Information.

HLBS Shares Your Personal Information with third parties in the following circumstances:

- Where HLBS has obtained your consent;
- Where sharing or disclosure of your Personal Information is necessary to provide you with the Website, and/or associated services (We may share your personal or personally identifiable information with trusted third-parties who assist us in operating the Website, providing the associated services, and conducting our business);
- Where sharing or disclosure of your Personal Information is necessary pursuant to a campaign with Facebook, Instagram, or another third-party social media platform;
- Where sharing or disclosure of your Personal Information is necessary to share personal or personally identifiable information with HLBS' parents, subsidiaries, successors, assigns, licensees, affiliates, or business partners;

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- Where HLBS has been purchased by a third party;
- Where sharing or disclosure of your Personal Information is necessary to respond to requests by government authorities;
- Where your Personal Information is demanded by a court order or subpoena;
- Where sharing or disclosure of your Personal Information is needed to protect the employees, independent contractors, officers, directors, members, users, or owners/shareholders of HLBS;
- Where sharing or disclosure of your Personal Information is needed to help prevent against fraud or the violation of any applicable law, statute, regulation, ordinance, or treaty; and
- Where HLBS is otherwise legally obligated to share your personal or personally identifiable information.

HLBS Shares Your Personal Information With the Following Third-Parties:

- Google, including Google Analytics (privacy policy [here](#));
- Iuno (privacy policy [here](#));
- Authorize.Net (privacy policy [here](#));
- NXGEN (privacy policy [here](#));
- TaxJar (privacy policy [here](#));
- United Parcel Service (privacy policy [here](#));
- United States Postal Service (privacy policy [here](#));
- Imworld Services, Inc. (privacy policy [here](#))

No Liability Third-Party Services and Third-Party Links.

The third-party service providers affiliated with HLBS have their own independent privacy policies governing the use of your Personal Information pursuant to the GDPR and CCPA and we encourage you to read those privacy policies carefully. You understand that even if HLBS deletes your Personal Information that it may still be available in a third-party service provider's database. HLBS has no responsibility or liability for the Personal Information collection, use, or storage activities of the third-party services providers used by HLBS to provide you with the services associated with the Website.

HLBS may outsource or subcontract some of our technical support, tracking and reporting functions, database management functions, and other services to third parties. We may share information from or about you with them so that they can perform their services as long as they comply with this Privacy Policy, the GDPR, and the CCPA. You understand and agree that HLBS will not be held responsible for any third-party communications sent by entities that HLBS does not own or control. You are encouraged to review any third-party privacy policies before utilizing any such third-party service.

HLBS may include or offer third-party products or services on the Website and provide third-party links to the same. These third-party websites have separate and independent privacy policies. HLBS has no responsibility or liability for the content and activities of such third parties or their websites. We encourage you to read carefully the privacy policies of all such third-party websites. We seek to protect the integrity of the Website and therefore welcome any feedback about any such third-party websites.

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Personal Information Transfer and Storage.

Your Personal Information is stored and processed on computers and servers in the United States, Luxembourg, and/or Hungary and through your use of the Website, you consent to the processing and storage of your Personal Information and personally identifiable information. You understand that your Personal Information may be transferred to – and maintained on – computers located outside of your state, province, country, or other governmental jurisdiction. If you are located outside the United States and choose to provide Personal Information to us, please note that we may transfer your Personal Information to the United States and process it here, and that we may store portions of your Personal Information in the United States.

Website Users understand and agree that if they provide HLBS with Personal Information that it is stored indefinitely, unless the User contacts HLBS to have their Personal Information removed from storage. As specified above, even if HLBS deletes your Personal Information from its own servers, it may still be available in a third-party service provider's database. You should consult with those third-parties in the event you would like Personal Information deleted therefrom.

Personal Information Security.

HLBS uses standard technology to store and help prevent against the unauthorized disclosure of your Personal Information. Though we undertake commercially reasonable efforts to protect your information, no website, software, or online service is completely safe. Accordingly, you provide all such information at your own risk.

In order to protect your Personal Information, HLBS uses specific security measures, such as Secure Sockets Layer (SSL) protocol, which encrypts information you input at 128-bit strength. This is denoted in most web browsers by a small padlock appearing on the bottom bar of the window and the address of the window changing from http:// to https://, indicating a secure connection.

EU Users' Rights Under the GDPR.

The GDPR provides Users located in the EU under its protection certain rights with respect to their Personal Data collected by us on the Website. Accordingly, HLBS recognizes and will comply with the GDPR and those rights, except as limited by applicable law. The rights under the GDPR include:

- **Right of Access:** This includes the right to obtain from us your Personal Data and whether it is being processed, along with the purposes of the processing; categories of Personal Data concerned; recipients to whom your Personal Data has been disclosed; the period for which your Personal Data is being stored; and the right to lodge a complaint.
- **Right of Rectification:** This includes the right to correct inaccurate Personal Data collected and/or stored by us.
- **Right of Erasure ("Right to be Forgotten"):** This includes the right to have your Personal Data deleted. However, if applicable law requires us to comply with your request to delete

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information, fulfilment of your request may prevent you from using our services and may result in closing your account.

- **Right to Restriction of Processing:** This includes the right to request restriction of how and why your Personal Data is used or processed by us.
- **Right to Data Portability:** This includes the right to receive your Personal Data in a structure, readable format and the right to have your Personal Data transferred.
- **Right to Object:** This includes the right to object to us processing your Personal Data for reasons such as direct marketing purposes and for scientific or historical research or statistical purposes.
- **Right to not be Subject to Automated Decision-Making:** This includes the right to not be subject to a decision based solely on automated processing, including profiling, that could have a legal, or similarly significant, effect on you from being made solely based on automated processes.

California Users' Rights.

Under the CCPA, California Users have the following rights:

- **Right to Know About Personal Information Collected, Disclosed, or Sold:** You have the right to request that HLBS disclose what Personal Information of yours it collects, uses, discloses, and sells over the past 12 months.
- **Right to Have Personal Information Deleted:** You have the right to request that HLBS delete any of your Personal Information that we collected from you.
- **Right to Opt-Out of the Sale of Personal Information:** HLBS does not sell Personal Information.
- **Right to Non-Discrimination:** HLBS shall not discriminate against California Users for exercising their rights under the CCPA.

To exercise your rights under the CCPA, you may submit a request to HLBS by contacting HLBS at privacy@hlbsusa.com. When exercising your rights under the CCPA, HLBS will verify your identity through your HLBS ID or email address.

Under California's "Shine the Light Law," California residents have the right to receive information that identifies any third-party companies or individuals that HLBS has shared your Personal Information with in the previous calendar year, as well as a description of the categories of Personal Information disclosed to that third party. You may obtain this information once a year and free of charge by contacting HLBS at the address below.

Purchase or Sale of the Website or Other Assets.

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HLBS may purchase other businesses or sell components of its business, including, but not limited to, the Website. In the event HLBS purchases another business or sells any component of its business, your Personal Information will continue to be used consistent with the terms of this Privacy Policy.

How to Stop HLBS from collecting your Personal Information.

You can stop HLBS from collecting your Personal Information and/or have your Personal Information deleted by contacting HLBS at privacy@hlbsusa.com and requesting that HLBS stop collecting and/or delete your Personal Information. Additionally, you can adjust your web browser settings to limit or turn off Cookies or other tracking techniques, or you can cease use of the Website. You may contact HLBS with any requests regarding your Personal Information.

Your Obligations.

When using the Website, you are obligated to inform HLBS of any changes to your Personal Information.

Children's Online Privacy Protection Policy.

The Website is not intended for or directed to users under the age of 18, and HLBS does not knowingly or intentionally collect Personal Information from children under the age of 13 or other minors. Where appropriate, HLBS takes reasonable measures to determine that users are adults of legal age and to inform minors not to submit such information to the Website or in response to advertisements. If you are concerned that Personal Information may have been inadvertently provided to or collected by HLBS, please contact us immediately so appropriate steps may be taken to remove such information from HLBS's database.

Contact and Notices.

All questions and concerns regarding this Privacy Policy may be submitted to HLBS at:

HLBS Global Marketing US LLC
P.O Box 1331
Marble Falls, TX 78654
privacy@hlbsusa.com