

*Website and Back-Office Privacy Policy*

You have entered a “replicated website,” of an Independent Associate for TRUVY Corporation the Back-Office of a TRUVY Independent Associate, the corporate website of TRUVY, or a mobile application (“App”) operated by TRUVY (referred to herein as “TRUVY”, “our”, “us” or “we”). The site or App you have entered (collectively the “Site”) is operated by TRUVY, and is hosted on the server of TRUVY’s third-party technology provider. The information you submit on this Site is sent to / accessed by TRUVY and the Independent Associate to whom this Site is assigned (excluding bank account or credit card information). By visiting this Site and providing information to TRUVY you consent to the following privacy policy, use and disclosure of information.

**INFORMATION COLLECTION**

*Personal Identifiable Information*

Through your use of or visits to the Site, you may be required or requested to provide personally identifiable information to us. Personally identifiable information is any piece of information that can potentially be used to uniquely identify, contact, or locate a single person including names, account names, addresses, email addresses, telephone numbers, I.P. addresses, social security and tax identification numbers, and credit card or banking information.

*Associate and Customer Information*

In order to become an Associate or customer, you must provide biographical and contact information (such as name, mailing address, telephone numbers, and email address) to us. Associate applicants must also provide personal information such as an applicant’s Social Security Number or Federal Tax ID Number so that we may prepare and file necessary non-employee compensation forms for the IRS. Associates and customers are also required to provide payment information (such as credit card, debit card, or checking account information). We use this information to maintain contact with Associates and customers, to process Associate and customer orders, and for billing purposes.

*We Use Cookies*

This site uses cookies to help us understand user behavior. This means that we put a small piece of text (the “cookie”) in storage on your web browser. This cookie lets us know that all the different things you do on our site are done by the same person. We do not collect or harvest any personally identifiable information. The only information we have about your identity is the information you explicitly provide to us through submission forms on our website. We do not sell any personally identifiable information to any third parties. We do analyze user behavior in order to better serve you and other visitors. Tracking your activity through our site (what you click on, how long you stay) helps us make better decisions about content and design.

## **INFORMATION USE & SHARING**

### ***Personal Identifiable Information***

TRUVY DOES NOT share personally identifiable information except with contracted service providers as may be necessary to: (a) process orders and/or returns and obtain payment; (b) complete an enrollment as an Associate or customer; (c) maintain our genealogy database; (d) issue payment and report income to taxing authorities; (e) maintain communication with you; (f) to upline Associate(s) as described in the Genealogy Information section; (g) assign prospective customer or Associate leads to existing Associates; (h) to assign a sales or enrollment lead to an Associate; (i) to governmental agencies or third parties as required pursuant to law or legal process; and (j) third-parties as necessary to conduct surveys or gather information and data as TRUVY deems appropriate to assist in managing the company.

### ***Genealogy Information***

As a network marketing company, TRUVY provides certain information to Associates regarding the other Associates and Customers enrolled in an Associate's downline marketing organization. If you enroll as an Associate or Customer with TRUVY, your name, address, email address, telephone number, and sales volume information will be provided to other Associates as downline genealogy information. No other personally identifiable information will be shared with other Associates. Information relating to downline Associates is made available to TRUVY Associate subject to a confidentiality and non-solicitation covenant in the agreement that each Associate enters into with TRUVY. However, TRUVY does not warrant that other Associates will adhere to the confidentiality and non-solicitation covenants, and TRUVY shall not be responsible for Associates' violation of these covenants.

### ***Sales Information***

If you make a purchase from an Associate's Replicated Website, we will provide the Associate to whom the Replicated Website is assigned with your name, contact information, a description of the item(s) purchased, and the sales volume associated with the purchase. No other personally identifiable information will be shared with the Associate. If you are an Associate, a description of the item(s) purchased, and the sales volume associated with the purchase will be provided to your upline.

### ***Aggregate Information (non-personally identifiable)***

TRUVY 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 Transitions***

In the event TRUVY goes through a business transition, such as being acquired by another company, or selling all or part of its assets, the personal information of Associates and customers will, in most instances, be part of the assets transferred. In such a case your personally identifiable information will be transferred to the acquiring individual or entity and shall be subject to the privacy policy of the individual or entity that acquires TRUVY.

## MISCELLANEOUS

### *Dispute Resolution*

This privacy policy is governed by the laws of the State of Utah. The offer extended by this Agreement, and any acceptance of its terms, shall occur in Salt Lake County, State of Utah. Any dispute arising from or relating to this privacy policy shall be brought in the courts of the State of Utah residing in Salt Lake County. The parties stipulate to exclusive jurisdiction before such court and further stipulate that venue is proper before such court. Each party to a dispute arising from or relating to this privacy policy shall bear his/her/its own attorney's fees, costs, and expenses

**If a visitor to this site wishes to bring an action for the breach of this privacy policy, he/she shall do so on an individual basis. Visitors waive all rights to bring an action on a class or consolidated basis.**

If a visitor to this site is also a TRUVY Associate and combines claims under this privacy policy with claims that are subject to TRUVY's Terms & Policies that are applicable to Associates, the dispute resolution provisions of the TRUVY Terms & Policies shall govern.

### *Changes to this Privacy Policy*

TRUVY reserves the right to amend or change this Privacy Policy at any time at its sole discretion. When material changes or amendments are made to the Privacy Policy, we will announce the same under the Privacy Policy tab for a period of at least 30 days prior to implementation of the amended Privacy Policy.

### *California Residents*

You have certain rights with regard to your personal information. These rights include:

- You have the right to know that we do not sell your personal information to any third party.
- You may submit a request to TRUVY via email at [compliance@TRUVY.com](mailto:compliance@TRUVY.com) or call 855-213-TRUV (8788) to request any of the following:
  - For a description of the categories of personal information we collect and the reasons we collect this information.
  - Disclose all the personal information we have about you.
  - If your business is cancelled for any reason, once six (6) years have passed you may request that we delete your personal information.
  - For a description of the categories of personal information we collect and a description of the categories of third parties to which we disclose your personal information.
  - For a list of third parties to which we have provided your personal information for business purposes, and the corresponding purpose for which we have disclosed your information.
- If you call you must provide your address, Associate ID number, and the last four digits of the credit card you have on file with the company to verify your identity.

***Links***

TRUVY’s websites may contain links to or from other sites. Please be aware that TRUVY is not responsible for the privacy practices of such other sites. We encourage users to be aware when they leave our site and to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by TRUVY websites.

**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 personal 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.

**Online Privacy Policy Only**

This online privacy policy applies only to information collected through our website and not to information collected offline.

***Questions***

Questions regarding this Privacy Policy should be directed to [Compliance@TRUVY.com](mailto:Compliance@TRUVY.com)

***Effective Date***

The effective date of this Privacy Policy is April 2020.