

Privacy Policy

Thank you for visiting this site provided by ACN Europe B.V. (Company No. 34110202) which is incorporated under the laws of The Netherlands and whose registered address is Thomas R. Malthusstraat 1-3, 1066 JR Amsterdam, The Netherlands (referred to herein as “Company”, “we”, “us, or “our”). We are serious about the privacy of our customers and users of our websites and applications (individually and collectively, “you”).

This Privacy Policy explains our data processing practices pertaining to all information processed by us about an identifiable individual (“Personal Data”) in the capacity of controller pursuant to the EU General Data Protection Regulation 2016/679 (GDPR) and other applicable law. This Privacy Policy describes the purposes for which we collect, use and disclose Personal Data, on the basis of which legal ground, and the rights that you can exercise in relation to the processing of your personal data, such as your right to access, correct, and delete your Personal Data. This policy also addresses the steps we take to secure your Personal Data.

This Privacy Policy contains the following sections. You should read the entire policy; however, you may use the links below to be directed to the information you want:

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1. Contact Information

ACN Europe B.V.
Thomas R. Malthusstraat 1-3
1066 JR Amsterdam
The Netherlands

Email: euprivacyofficer@acneuro.com

2. Applicability

This Privacy Policy is only applicable to Personal Data that we may process in the course of providing the Membership or when you visit our websites. It does not cover any information about more than one individual where the identity of the individuals is not known and cannot be directly or indirectly determined from the information in a legal manner. We may process Personal Data to produce anonymized data, which does not (directly or indirectly) identify you or anyone else. We retain the right to use and disclose such anonymized information in any way that we reasonably determine is appropriate.

3. Who Collects Your Personal Data

Your Personal Data is initially collected by or on behalf of Company. Your Personal Data is shared with affiliates of Company and with third parties for the purposes and in the manner described in this Privacy Policy. Please see [section 7](#) of the Privacy Policy for an overview of parties to whom we may disclose your Personal Data for the purposes indicated in [section 6](#).

4. What Personal Data Do We Collect?

The Personal Data and other information that we collect varies depending on your relationship with the Company.

When providing the Truvvilifestyle Membership, we may process the following Personal Data:

- Name;
- Residential address;
- Date of birth;
- Telephone number;
- Email address;
- Information on the Membership you subscribed to, such as the tier, start date and status;
- Recordings of telephone calls where you have been provided with notice of the recording at the start of the call as well as the possibility that you can refuse to such recording;
- Electronic and written communications;
- Your Truvvilifestyle account login information;
- Other identifying information separately consented to by you and required for the purposes indicated in [section 6](#).

When visiting our websites, we may process the following Personal Data:

- IP addresses and general geolocation information;
- MAC addresses, operating system, and browser information.

This information is obtained via the use of cookies and/or similar technologies on our websites. More information about the use of cookies and similar techniques and the purposes thereof can be found in our Cookie Policy.

5. How Do We Collect Personal Data?

We collect your Personal Data in a variety of ways, including:

- the submission of Personal Data by you to Company through the websites;
- the submission of an online order for the Truvvilifestyle Membership from Company;
- when you communicate with us by email, telephone, fax, chat line, the websites, or otherwise;
- provision of your Personal Data to Company by Company's business partners, such as our engaged payment processing providers, in order for you to use your Membership (also see [section 7](#)); and
- the use of cookies and other web technologies, as described in the Cookie Policy.

Although Company collects Personal Data primarily from you, it may also collect Personal Data from other sources including service providers, or other third parties who represent that they have a right to disclose that information.

Company will not contact you by telephone or email to request sensitive information such as credit card numbers, account numbers, passwords, and PIN codes. We recommend that you do not respond to telephone calls or emails requesting this type of information and that you contact us if you receive such a request that purports to be from Company.

6. Why we Use Personal Data

Company collects and processes Personal Data and other information for a variety of purposes, including:

- a. to present our websites and their respective contents to you;
- b. to verify, process, and administer your orders for the Truvvilifestyle Membership;
- c. to collect payment from you for the Truvvilifestyle Membership;
- d. to provide you with the Truvvilifestyle Membership;
- e. to maintain our commercial relationship with you, including billing and customer service;
- f. to carry out our obligations and enforce our rights in connection with any contracts that you may enter into with us, including the provision of notices pursuant to those agreements;
- g. to provide you with information about your account, your Membership, and our policies;

- h. to understand and respond to your problems with your Truvvilifestyle Membership;
- i. to meet our legal and regulatory obligations, protect Company's legal and financial interests (including fraud detection and prevention), and to conduct compliance investigations;
- j. to comply with Company's statutory reporting obligations to government agencies (e.g. collecting and remitting taxes, responding to regulatory authority inquiries in the field of consumer protection or data protection);
- k. for the provision and receipt of the Membership and fees;
- l. to prepare internal (aggregated) reporting on customer matters and general business needs;
- m. to provide to our business partners and their representatives that market and promote Truvvilifestyle and make referrals to Company, for commission purposes, such as tracking, compensation, supervision, and training purposes;
- n. to facilitate Company's financial, accounting and administrative functions;
- o. to allow us to identify and inform you about related services and products offered by Company that may be of interest to you, including sending commercial and marketing communications;
- p. for any other purpose disclosed by us when you provide the Personal Data;
- q. for any other compatible purpose with your informed consent.

7. Legal grounds for processing Personal Data

Personal Data shall be collected, used, stored or otherwise processed, when necessary, within the framework of responsible, efficient and effective business management of Company, as stated in this Privacy Policy. The Company processes Personal Data based on one or more of the following applicable legal ground(s).

- The processing is necessary to perform an agreement between you and Company

Processing purposes: a., b., c., d., e., f., g., h., l., n., p.

- The processing is necessary for us to comply with our legal obligations

Processing purposes: i., j., n., p.

- The processing is necessary for the legitimate interests of Company, except where such interests are overridden by your interests or fundamental rights and freedoms

Processing purposes: a., e., f., g., h., i., k., l, m., n., o., p.

- Where appropriate and required, we will ask for your consent.

Processing purposes: o., p., q.

8. How We Transfer Personal Data to Third Parties

Company may transfer your Personal Data to third parties outside of Company for the purposes set forth in this Privacy Policy and as permitted or required by applicable law. We may share your Personal Data with third parties to accomplish the purposes described in [section 7](#) above. In that regard, Company may share your Personal Data with:

- Agents that are licensed to promote the Truvvilifestyle Membership in the EU on our behalf and the company that pays those agents: such as our Independent Business Owners and our parent company, ACN, Inc.
- Payment processing providers: such as Stripe
- Hosting and back-up providers: such as Amazon Web Services
- IT providers of the Booking Platform: such as Custom Travel Solutions, LLC
- Customer service providers: such as our affiliate Telecommunications Operations & Service Centre (ACN) sp zoo

We also may provide Your Personal Data to governmental authorities as part of regulatory, statistical, or analytical reports, as required or allowed by applicable laws and regulations, to investigate and help prevent potentially unlawful activity, or in response to a specific request from government, regulatory, or law enforcement authorities, such as a subpoena, search warrant, or other legal process. We also may disclose your Personal Data to the extent we determine doing so is necessary or appropriate to protect the rights, property, or safety of the

Company, our customers, or others, which includes exchanging information with other companies and organizations.

We reserve the right to transfer any Personal Data we have about you in the event that we merge with or are acquired by a third party, undergo another business transaction such as a reorganization, or should any such transaction be proposed.

9. How Long We Keep Your Personal Data

The Company keeps your Personal Data as long as it is required for the purposes for which it was initially collected in accordance with our records retention policy, subject to applicable law. Such period varies depending on the type of Personal Data involved. For example, we keep customer service records for five years, while customer contracts are kept for the term of the agreement plus ten years. In some cases, we need to keep your Personal Data for a minimum period of time in order to comply with legal or regulatory obligations. Please contact us using the contact details above if you have questions about specific retention periods.

10. Where We Store Your Personal Data

The Personal Data processed by Company for the purposes indicated in [section 6](#) is directly collected from you. For international transfers of personal data pursuant to Article 44 et seq. GDPR that take place for the purposes described herein and for all other purposes Company will take all measures required to comply with GDPR in order to ensure the protection of your Personal Data. For instance, by storing your Personal Data on secured computer servers and entering into data processing agreements with its processors.

Your Personal Data is stored on secure computer servers located in the European Union and the United States. As a result, some or all of the Personal Data we collect may be stored or processed on servers located outside your jurisdiction of residence, including in the United States, whose data protection laws may differ from the jurisdiction in which you live. Accordingly, your Personal Data may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions. To ensure that the level of your protection guaranteed by the GDPR is not undermined, we only disclose your Personal Data to our partners if such is allowed according to the GDPR and other applicable (local) data protection legislation. Our sub-contractors are only allowed to use your Personal Data for the purposes described in this Privacy Policy and only in accordance with our instructions. Company will only use sub-contractors which provide sufficient guarantees to implement appropriate technical and organizational measures and ensure the protection of your rights.

11. Use of Cookies and other Web Technologies

We may collect information about the actions you take on the websites and the equipment you use to access the websites through automatic data collection technologies such as cookies, embedded web links, and web beacons. The information we collect includes information collected through such technologies. We use this information to improve our websites and deliver a better and more personalized service, including by enabling us to: estimate our users' size and usage patterns; store information about your preferences, allowing us to customize our websites according to your individual interests; speed up your searches; and recognize you when you return to our websites. For more information, please see the Cookie Policy.

12. Third-Party Sites and Content

Company websites may contain links to third-party sites owned or operated by Company business partners or other persons. If you follow these links, you will leave our websites, and because this Privacy Policy does not apply to third-party websites, you should review the privacy disclosures of those websites before using them. We are not responsible for the practices of third-party websites.

13. Provision of Cardholder Data

Company may require you to provide our payment providers with credit or debit card information ("Cardholder Data") in connection with the purchase of the Truvvilifestyle Membership. Cardholder Data may be used for current payments and stored for future or recurring payments. Payments are issued through our payment providers. Company requires its providers to maintain controls consistent with the Payment Card Industry Data Security Standard and other industry standards to protect Cardholder Data; however, these safeguards may not prevent every unauthorized attempt to access, obtain, or use Cardholder Data.

14. Security

Company has implemented technological and organizational measures intended to help safeguard your Personal Data from unauthorized access or use during collection and while it is in our possession. Personal Data may be accessed by persons within our organization, or our third-party service providers, or business partners who require such access to carry out the purposes indicated in this Privacy Policy, or such other purposes as may be permitted or required by the applicable law.

Nonetheless, you should also take measures you deem appropriate to safeguard your Personal Data, such as by maintaining the confidentiality of your access credentials, logging out of websites, closing your web browsers when you have concluded your online activities, changing your passwords regularly, and not providing your Personal Data to persons who are unfamiliar to you.

Company may communicate with you by email or chat and these communications may at times contain Personal Data. These communications may not be secure. Please do not

send government-issued identification numbers, financial information, Cardholder Data or other sensitive information to us by email or chat, and we will not ask you to provide such information in this manner.

15. Your Right of Access, to Rectification and Erasure of Your Personal Data

You have the right to access the Personal Data that we hold about you, and to have us correct your Personal Data if the information that we have is inaccurate or incomplete, and, in some cases, to request deletion your Personal Data. You may obtain a copy or correct or request deletion of your Personal Data by contacting our Privacy Officer in writing at :

ACN Europe B.V.
Thomas R. Malthusstraat 1-3
1066 JR Amsterdam
The Netherlands

Email: euprivacyofficer@acneuro.com

Please note, however, that in some cases we may not be able to allow you to access certain Personal Data in certain circumstances, for example if it contains Personal Data of other persons, or for legal reasons, to protect our interest in legal proceedings. We may require you to verify your identity before we allow you to access, correct or delete your Personal Data.

16. Your Right to withdraw your consent

You have the right to withdraw consent for our use of your Personal Data however please be aware that doing so may impact our ability to provide the Membership to you where such information is necessary for the provision of such service. Please also note that we are permitted to keep certain of your Personal Data in order to meet our legal, financial, audit, and business needs, even if you withdraw your consent.

17. Your Right to restriction of processing

You are entitled to ask us to (temporarily) stop using your Personal Data, for example where you think that the Personal Data, we hold about you may be inaccurate or where you think that we no longer need to use your Personal Data.

18. Your Right to data portability

You may have the right to ask that we transfer Personal Data that you have provided to us to a third party of your choice. This right can only be exercised when you have provided the Personal Data to us, and when we are processing that data by automated means based on your consent or in order to perform our obligations under a contract with you.

19. Right to object

You have the right to object to the processing of your Personal Data which is based on our legitimate interests. You may also ask us to stop using your Personal Data for marketing purposes at any time, and if you so, we will immediately cease use of your Personal Data for this purpose. For other purposes based on our legitimate interests, we will no longer process the Personal Data on that basis when you file an objection, unless we have a compelling legitimate ground for the processing. Note, however, that we may not be able to provide certain services or benefits if we are unable to process the necessary Personal Data for that purpose.

20. Opting Out of Promotional Offers from Company

If you consent to having your email address or contact information used by us to promote our own or third-parties' products or services and later change your mind, you can withdraw your consent (opt-out) by sending us an email stating your request to euprivacyofficer@acneuro.com. In addition, you may later opt-out of promotional emails by clicking the unsubscribe or opt-out or unsubscribe link contained in such emails.

21. Changes to Privacy Policy

The Company may change this Privacy Policy at any time without prior notice, subject only to applicable law. Such changes shall not apply retroactively and are effective when they are posted on the websites unless otherwise stated. If we make material changes to how we treat your Personal Data, we will notify you or request your consent as required by applicable law through one or more of the websites and/or, if applicable, by email to the email address we have associated with your account.

You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our websites and this Privacy Policy to check for any changes. The date this Privacy Policy was last revised is identified at the bottom of the page.

22. Children

The Company does not promote products and services to children or knowingly accept orders from individuals below the age of majority.

23. Contact Us

You may address a challenge concerning compliance with this Privacy Policy or questions you have regarding our practice, to the designated person or persons accountable for our compliance with the Privacy Policy by sending an email to our Privacy Officer at euprivacyofficer@acneuro.com.

We shall investigate all complaints concerning compliance with the Privacy Policy. If a complaint is found to be justified, the Company shall take appropriate measures to resolve the complaint including, if necessary, amending its policies and procedures. The complainant

shall be informed of the outcome of the investigation regarding his or her complaint within the timeframe set by the GDPR.

You also have the right to lodge a complaint with the competent data protection authority in your country of residence or domicile. You can find the names and contact details of the data protection authorities in the EU under https://edpb.europa.eu/about-edpb/board/members_en.