



## YOUNG LIVING HONG KONG LIMITED PRIVACY POLICY STATEMENT

### A. General information

1. Young Living Hong Kong Limited (“we”, “our” or “us”) respects your privacy and is committed to comply with the requirements of the Personal Data (Privacy) Ordinance, Cap. 486 of the laws of Hong Kong (the “Ordinance”). This Young Living Hong Kong Limited Privacy Policy Statement (“this Policy”) is of great importance to the privacy, confidentiality, and security of the personal data that you provide to us.
2. We would like to explain to you with this Policy the kinds of personal data that we collect, the main purposes for which your personal data is or is to be used, the measures that we take to ensure its security and the nature of your rights.
3. This Policy can be updated at any time by us and any modifications shall take effect immediately. Thus, we invite you to refer to this Policy regularly in order to take note of the latest version available.
4. By using our website [https://www.youngliving.com/en\\_HK](https://www.youngliving.com/en_HK) (“our Website”), purchasing our products via our Website or our independent sales contractors (“Members”), enrolling to become a Member or using our services, you declare that you accept the terms of this Policy and agree that we can collect, use and disclose your personal data in accordance with this Policy. This Policy applies to all the personal data that you provide to us directly or indirectly. In the event of disagreement about the terms of the Policy, we invite you not to use our Website, purchase our products via our Website or Members, enrol as a Member or use our services.

### B. The data we collect about you

5. “Personal data” is defined under the Ordinance to mean any data:-
  - (a) relating directly or indirectly to a living individual;

- (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and
  - (c) in a form in which access to or processing of the data is practicable.
6. We collect personal data of our customers and Members
7. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
- (a) **Identity Data** such as first name, maiden name, last name, title, age, gender, Hong Kong Identity (“HKID”) number and copy of HKID card.
  - (b) **Contact Data** such as billing address, email address and telephone numbers.
  - (c) **Financial Data** such as bank account and credit card details.
  - (d) **Transaction Data** such as order history and details about payments to and from you.
  - (e) **Technical Data** such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, the time you spent on our Website and the content you watched on it, operating system and platform and other technology on the devices you use to access our Website.
  - (f) **Profile Data** such as your username, PIN, password, your preferences (including your dietary requirements, photo, hobbies and leisure **activities** and any other related products or services you subscribed to), your feedback and survey responses.
  - (g) **Usage Data** such as information about how you use our Website, including record of absence/time tracking, cart history,
  - (h) **Marketing and Communication Data** such as your preferences in receiving marketing from us and your communication preferences, Participation in events and campaigns.
  - (i) **Membership Data** such as distribution channels (i.e. support team (formerly known as “upline”) and team (formerly known as “Downline”)), performance rating, member status and rank, recognition level and disciplinary actions.
8. We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the

percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

9. We will indicate in the relevant forms or applications if the required personal data is for obligatory or voluntary purposes. If personal data is to be used for an obligatory purpose (e.g. where we need to collect personal data by law, or under the terms of a contract we have with you) and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with the products or services requested). If personal data is only to be used for a voluntary purpose, you can choose not to supply such personal data to us.

### C. How is your personal data collected?

10. We collect personal data about you from various sources, and in particular we collect personal data through:
  - (a) **Direct interactions** - You may give us your Identity, Contact, Financial, Profile and Marketing and Communication Data by filling in the relevant forms and applications, or by corresponding with us by post, phone, email or otherwise. This includes (but is not limited to) personal data you provide when you:
    - (i) purchase products on our website;
    - (ii) fill out a form or agreement to become a Member;
    - (iii) create an account on our Website;
    - (iv) sign up to receive our newsletter;
    - (v) give us feedback, send us an email communication or use our chat service; or
  - (b) **Automated technologies or interactions** - As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
  - (c) **Technical Data and Usage Data** from analytics providers such as Google; and
  - (d) **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services.

### D. How we use your personal data

11. From time to time, we may collect your personal data to provide our products and/or services to you and to improve our system so as to make your experience as a customer or Member better. The personal data collected from you will be used by us for one or more of the following purposes:-
- (a) registering you as a new customer;
  - (b) registering you as a new Member;
  - (c) processing, administering and managing any contract (including orders for our products) entered into between you and us;
  - (d) providing administrative support, training and seminars to you as a Member;
  - (e) ascertaining the kind of information, products and/or services to be provided to you;
  - (f) processing any transactions or payments made by you and maintaining payment records;
  - (g) processing any transactions or payments made to you as a Member and maintaining payment records;
  - (h) contacting you or communicating with you via telephone call, text message, fax message, email and/or postal mail;
  - (i) providing information, our products and our services to you;
  - (j) improving our Website;
  - (k) managing our business relationship with you including but not limited to providing you with customer services, notifying you about changes to our terms or our Privacy Policy Statement and asking you to leave a review or take a survey;
  - (l) administering and protecting our business and our Website including but not limited to troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
  - (m) delivering relevant content and advertisements to you and making recommendations to you about products and/or service that may be of interest to you, if we have obtained your express consent to the use of your personal data for this purpose;
  - (n) preventing and detecting frauds, malicious software and managing security incidents;

- (o) complying with court orders and/or any disclosure requirements under the laws of Hong Kong;
  - (p) collecting and recovering money owed to us;
  - (q) managing and resolving disputes between you and us including but not limited to responding to legal process, pursuing legal rights and remedies, defending litigation and managing any complaints or claims; and
  - (r) ascertaining Members you have enrolled and the distribution channels of Members.
12. In addition to the above, if you are a Member, we may use your Identity Data for the following purposes:
- (a) we may use your Identity Data, including your HKID number, to confirm that you are a real and distinct individual in order to:
    - (i) carry out the prevention or detection of crime (e.g. fraud resulting from false Members or individuals acting as multiple Members) under Section 58(1) of the Ordinance;
    - (ii) enable us as the data user to identify you to enable us to safeguard against damage or loss that is more than trivial; and
    - (iii) include in a document (e.g. the agreement to become a Member) that establishes or is evidence of any legal or equitable right or interest (e.g. a Member's right to purchase our products at wholesale prices, right to offer for sale our products and right to act as "Sponsor" of new Members) that is not trivial;
  - (b) we may use your Identity Data, including your HKID number, to verify your identity before we take certain action in relation to your Member account in order to:
    - (i) carry out the prevention or detection of crime (i.e. fraud where an individual is purporting to be another individual who is a Member) under Section 58(1) of the Ordinance; and
    - (ii) to enable us as the data user to identify you as a Member to advance your interests (e.g. enabling direct depositing of your commissions and bonuses, reactivating your status as a Member and restoring your "organisation" and selling and/or transferring your interest in your "organisation");

- (c) we may use your Identity Data, including your HKID number, in order to carry out the assessment of tax under Section 58(1) of the Ordinance; and
- (d) if you choose to send to us a copy of your HKID card (rather than presenting your physical HKID card in person) to verify your HKID number in our records, we may use the copy of your HKID card for such verification purpose.

### 13. Use of Personal Data in Direct Marketing

- (a) We intend to use your name, mobile phone number, correspondence address and email address for direct marketing purposes to provide you with information relating to our products and/or services through direct-mail, email, telephone, SMS, printed matter, newsletter, brochure and leaflets.
- (b) We cannot use your personal data in direct marketing unless we have your consent which includes an indication of no objection to the intended use.
- (c) If you do not consent to our use of your personal data for the relevant direct marketing purposes, please indicate accordingly in the relevant forms, applications and/or agreements in the designated place by ticking the relevant box. If you do not tick the box, you agree that we may use your personal data for the relevant direct marketing purposes.
- (d) If you want to withdraw your consents for us to use your personal data for direct marketing purposes, you may, at any time without charge, contact our Data Protection Officer by sending an email to [DPO@youngliving.com](mailto:DPO@youngliving.com) or a letter to Young Living Hong Kong Limited, 20/F Soundwill Plaza 2 Midtown, 1 Tang Lung Street, Causeway Bay.

### 14. Cookies

When using the Young Living sites, various types of cookies are used and stored on your computer. Cookies are small text files stored on your device that tell websites who you are. Through the settings in your browser, you can elect to disable, limit, or delete cookies. However, we cannot accomplish many of the basic functions needed to create and process an order on our sites without cookies. For this reason, we recommend you keep cookies activated. We have broken up our cookies into the following categories to help you understand what they do:

- (a) Essential: These cookies are required to use our website. For example, they are necessary to add items to your cart and check out.
- (b) Performance: These cookies track how you interact with our website. For example, Google Analytics lets us know which pages on our website load slowly or are not optimized for mobile use. We use this information to make improvements to our user experience.

- (c) **Functionality:** These cookies track information about you to make using our website easier. For example, we use this information to store your language preferences.
- (d) **Marketing and Advertising:** These cookies help us create targeted advertising experiences for you.

15. **Change of purpose**

- (a) We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is necessary for or directly related to the original purpose. If you wish to get an explanation as to how the processing for the new purpose is necessary for or directly related to the original purpose, please contact us.
- (b) If we need to use your personal data for an unrelated purpose, we will seek your consent before doing so.
- (c) Please note that we may process your personal data without your knowledge or consent, where it is required or permitted by law.

**E. Disclosure of your personal data**

16. We may have to share your personal data with one or more of the parties in or outside Hong Kong set out below for the purposes set out in Section D above:

- (a) our related companies, including associated companies and subsidiaries under the “Young Living” or similar brand, which operate the business of providing similar services as those provided to you by us;
- (b) third party service providers, including Members, facilitating our provision of products, services and/or information to you;
- (c) third party service providers providing software applications, functionality, data processing and/or IT systems and services to us;
- (d) third party service providers assisting us in our internal administration and management;
- (e) third party service providers assisting us with our marketing activities;
- (f) auditors, lawyers, accountant and other professional advisers;
- (g) financial institutions, credit card companies, payment processors, credit information or reference bureau, collection agencies;

- (h) governmental, regulatory or judicial authorities and/or law enforcement body as required by, or in accordance with the applicable laws and/or regulations to which we are subject;
  - (i) third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as us;
  - (j) any other person or company who is under a duty of confidentiality to us and has undertaken to keep such information confidential, provided that such person or company has a legitimate right to use such information; and
  - (k) your support team and team for the purpose of administering sales, distributing products and providing reports of your activities to other members.
17. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### **F. Data security**

18. Young Living has implemented appropriate physical, technical, and administrative security standards to protect personal information from loss, misuse, alteration, or destruction. Our service providers and affiliates are contractually obligated to protect the confidentiality of your personal information and may not use the data for purposes not authorized by us.

Although we do our best to protect your personal information, no data transmission over the internet or any wireless network can be guaranteed to be 100 percent secure. As a result, while we strive to protect your personal identification information, you acknowledge that there are security and privacy limitations inherent to the internet that are beyond our control and that the security, integrity, and privacy of any and all information and data exchanged between you and us through our websites cannot be guaranteed. Please do your part in protecting your personal information by keeping your account password safe and confidential, logging out of your account after using a shared computer, and regularly scanning your computer for viruses, malware, and spyware.

By using our sites, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our sites. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



## **G. Data retention**

19. 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.
20. 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 unauthorised 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.

## **H. Right of access and correction of personal data**

21. Pursuant to the Ordinance, you have the right to request access to and correction of your personal data held by us. Under the Ordinance, we are entitled to charge a reasonable fee to process the access request.
22. We will comply with the data access or correction request within 40 days after we have received your request. If for reasons provided for under the Ordinance we are of the view that we are unable to comply with your request or that we are entitled to refuse your request, we will notify you with reasons of such refusal within 40 days after receiving the said request from you.
23. Regarding any data correction request, if the relevant personal data provided by you has been disclosed to a third party during the 12 months immediately preceding the day on which the correction is made and that we have no reason to believe that the third party has ceased using that personal data for the purpose for which the personal data was disclosed to that third party, we will take all practicable steps to supply the third party with a copy of the personal data so corrected accompanied by a notice in writing stating the reasons for such correction.

## **I. Third party sites**

24. Our Website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.

## **J. Further Information / Request**

25. If you are concerned about the handling of your personal data, have any complaints or queries related to your personal data or this Policy, or wish to make a data access request or a data correction request, please contact our Data Protection Officer by email at [DPO@youngliving.com](mailto:DPO@youngliving.com) or by letter to Young Living Hong Kong Limited, 20/F Soundwill Plaza 2 Midtown, 1 Tang Lung Street, Causeway Bay.

## K. Translations

26. If there is any discrepancy between the English version of this Privacy Policy Statement and any version in other languages, the English version shall prevail.