

Red Aspen®, LLC
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www.redaspenlove.com

Privacy Policy

Last updated August 27, 2023

Red Aspen, LLC (referred to herein as “Red Aspen”, “our”, “us” or “we”) is committed to respecting the privacy rights of those visiting our websites, including the Red Aspen website (at <https://redaspenlove.com>), our Independent Brand Ambassadors’ and Affiliates’ Replicated websites and our mobile applications (hereafter collectively referred to as the “Site”). We created this Privacy Policy to give you confidence as you visit and use the Site, and to demonstrate our commitment to fair information practices and to the protection of privacy.

This Privacy Policy is only applicable to the Site and not to any Third-Party websites that may link to or from this Site, which may have data collection, storage and use practices and policies that differ materially from this Privacy Policy. For additional information, see the section concerning Third-Party Websites, below.

The Site is located in United States and is subject to U.S. laws. If you are outside of the United States, your use of the Site constitutes consent to the transmission of personal information to the United States. If your use of the Site is against the laws of your jurisdiction, it is your responsibility to refrain from the use of the Site.

BY USING THE WEBSITE, YOU REPRESENT AND WARRANT THAT YOU HAVE READ AND UNDERSTOOD, AND AGREE TO THE TERMS OF, THIS PRIVACY POLICY. IF YOU DO NOT UNDERSTAND OR DO NOT AGREE TO BE BOUND BY THIS PRIVACY POLICY, YOU MUST IMMEDIATELY LEAVE THE WEBSITE.

Each time you use the Site, the then-current version of this Privacy Policy will apply. Accordingly, each time you use the Site you should check the date of this Privacy Policy (which appears at the beginning) and review any changes since the last time you visited the Site. For additional information, see the section concerning Updates and Changes to Privacy Policy, below.

Children’s Privacy

Red Aspen is committed to the safety of our children. The Site is intended for a general audience and is not designed or intended for use by or targeted to children younger than the age of 16. We do not knowingly collect personal information from children younger than the age of 16. However, in all cases, if you are younger than the age of 18, you may use the Site (and any related services or features) only with the consent and supervision of a parent or guardian. Persons under the age of 18 may not enroll as Red Aspen Independent Brand Ambassadors or Affiliates or register as customers. We do not solicit or knowingly collect personally identifiable information from children under the age of 16. If we obtain actual knowledge that we have collected personally identifiable information from a child under the age of 16, we will immediately delete such information from our database. Because we do not collect personally identifiable information from children under the age of 16, we have no such information to use or

disclose to third parties.

Information Collection

Red Aspen is the sole owner of the Site. We collect information from Brand Ambassadors, Affiliates, customers, and visitors to the Site at different points on the Site.

- **Traffic Data.** Like most website operators, Red Aspen automatically gathers device and usage information of the sort that browsers automatically make available, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the Site, and other technical information (collectively “Traffic Data”). Traffic Data is anonymous information that does not personally identify you and is primarily needed to maintain the security and operation of the Site, and for our internal analytics and reporting purposes.
- **Cookies.** Cookies are small pieces of information that a website stores on a user's hard drive, and that the user's browser provides to the website each time the user submits a query to the website. The purpose of a Cookie is to identify the user as a unique user of the Site. The Site uses Cookies to customize your experience on the Site to your interests, to ensure that you do not see the same informational messages repeatedly, and to store your username so you do not have to re-enter it each time you visit the Site. For information on Red Aspen's uses of Cookies, see the section concerning Information Use and Disclosure Practices/Traffic Data and Information Gathered Using Cookies, below.
 - **Types of Cookies.** We use the following types of Cookies for the following purposes:
 - Session ID Cookies. We use session ID cookies to make it easier for you to navigate the site. A session ID cookie expires when you close your browser.
 - Persistent Cookies. We set a persistent cookie to store your valid login, so you do not have to login more than once. Persistent cookies also enable us to track and target the interests of our users to enhance the experience on the site. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's “help” file.
 - Functional cookies to remember choices that you have made or information you have provided, like username, language, or region.
 - Performance cookies that gather information for statistical purposes.
 - Advertising cookies to tailor marketing to you and your interests and provide you with more personalized services in the future.
 - Social and content cookies (for example the Facebook “like” button).
 - Store functioning cookies.
 - Reporting and analytics cookies.
 - **Third Party Cookies.** We may allow third parties to use Cookies on the Site, but we do not control the use or contents of third-party Cookies. Such third-party cookies may include:
 - Ad Services. In the course of providing advertisement services, third parties such as the following utilize cookies on the Site: Microsoft Advertising, Drift, Facebook Custom Audiences, Google, Hubspot, Intercom, Marketo, Outbrain, Quora, Reddit, SourceKnowledge.
 - Data Providers. We use third-party data provider cookies in connection with the

Site. The following third parties utilize data provider cookies on the Site: Shopify Analytics, Google Analytics, Cloudflare, Alexa Metrics, Bizible, Chartbeat, Crazy Egg, Datadog RUM, DC Analytics, Facebook Pixel, Fullstory, Google Tag Manager, Hotjar, iSpot, KissInsights, LinkedIn Insight Tag, New Relic, Optimizely, Pinterest Analytics, Segment, Snapchat, Taboola, Tealium, TikTok, Twitter, Yelp Audience Platform.

- Analytics. We use third-party analytics cookies to gain insight into how our visitors use the Website. Third parties such as Google Analytics utilize cookies on the Site for analytics.
- **Opting Out of Cookies.** If you do not wish to have cookies placed on your computer, you should set your browser to refuse cookies before accessing the website, with the understanding that certain of the services and certain features of the website may not function properly without the aid of cookies. If you refuse cookies, you assume all responsibility for any resulting loss of functionality. To learn more about cookies and how to manage them, go to <https://allaboutcookies.org/>.
- **Personal Information.** Through your use of or visits to the Site, you may be required or requested to provide personally identifiable information (hereafter “Personal Information”) to us. Personal Information is any piece of information which can potentially be used to uniquely identify, contact, or locate a single person. The personal information that we collect depends on the context of your interactions with the Site, the choices you make, and the products and features you use. The personal information we collect may include the following:
 - Names
 - Mailing Addresses
 - Email Addresses
 - Telephone Numbers
 - Usernames
 - Account Passwords
 - Contact Preferences
 - Contact or Authentication Data
 - Geolocation Information
 - Billing Addresses
 - Credit/Debit Card Information
 - Billing Information
 - Bank Account Information
 - Information associated with other accounts belonging to a user
 - Sensitive Information as described below

All Personal Information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such Personal Information. You are under no obligation to provide Personal Information to us, with the caveat that your refusal to do so may prevent you from using certain of the features and services available on the Site or from purchasing some or all of our products or enrolling as a Brand Ambassador or Affiliate.

- **Sensitive Information.** When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:
 - Social Security Numbers and Tax Identification Numbers
 - Driver’s License, State Identification Card, or Passport Number
 - Account log-in, financial account, debit card, or credit card number in combination with

any required security or access code, password, or credentials allowing access to an account

- A consumer's precise geolocation
- **Credit/Debit Card Information.** Credit/Debit card information collected at registration or for shopping cart orders is used only to process payment for purchases. Credit card information is retained by us in order to facilitate subscription purchases. In addition, users may elect to store their credit card information in order to pay for future product orders and recurring fees. To protect your Personal Information, we take reasonable precautions and follow industry best practices to make sure your credit card information is not inappropriately lost, misused, accessed, disclosed, altered or destroyed. Although no method of transmission over the Internet or electronic storage is 100% secure, we implement additional generally accepted industry standards. All payment data is stored by Shopify International. You may find their privacy notice at <https://www.shopify.com/legal/privacy>.
- **Information that you make Public.** The Site may contain features (e.g., public profiles, forums, and message boards) that permit you to upload, post, transmit, display, perform or distribute content, information or other material, including some of your Personal Information. Any information that you choose to disclose by means of such features becomes public information over which Red Aspen is unable to exercise control. You should exercise caution when deciding to disclose your Personal Information by means of such features, and you agree to assume all responsibility for doing so.

Information Obtained from Third Party Sources

We may supplement the Personal Information that a user provides to us with additional Personal Information gathered from public sources or from third parties (e.g., consumer reporting agencies) who may lawfully provide such information to us. We may receive information about you such as contact information and demographics information from other sources. In addition, we may combine information you give us with information from these sources. The types of information and sources of such information include without limitation the following categories:

- **Vendors.** We may receive contact information and demographic information that you provide to or through our vendors, such as through our email and text message campaigns.
- **Your Red Aspen Brand Ambassador (if applicable).** Information such as account or demographic information that is submitted by your Red Aspen Brand Ambassador on your behalf.
- **Payment Service Providers.** Payment information such as updated credit card number and expiration dates from your bank or credit card company which we use to keep our records current and service you better.
- **Delivery Service Providers.** Delivery details such as updated delivery, contact information, and address information from our carriers or other third parties which we use to keep our records current, process orders, deliver your next purchase, and service you better.
- **Social Media Services.** Information that you publicly post on our and your social media pages (e.g., our Facebook®, Instagram®, and Twitter® pages), such as your contact and demographic information, such as likes, interests, preferences, comments, suggestions, and opinions, general feedback, and content.
- **Other Third-Party Sources (Including Data Aggregators and Public Databases).** Transactional data from third party purchases; contact information, demographics information, including profile

data; information about products or services purchased from other companies.

Information Use and Disclosure Practices

- **Traffic Data and Information Gathered Using Cookies.** Red Aspen analyzes Traffic Data and information gathered using Cookies to help Red Aspen better understand who is using the Site and how they are using it. By identifying patterns and trends in usage, Red Aspen is able to better design the Site to improve your experience, and to serve you more relevant and interesting content. From time to time, Red Aspen may release Traffic Data and information gathered using Cookies in the aggregate, such as by publishing a report on trends in the usage of the Site. Red Aspen does not attempt to link information gathered using Cookies to Personal Information.
- **Personal Information.** Personal Information is used and disclosed as described in this Privacy Policy. In general, we use your Personal Information to:
 - Process your orders;
 - Communicate with you regarding your orders, your account, the use of our products or services, or otherwise provide customer service;
 - Maintain your account and keep track of any purchases made by you;
 - Authenticate your account credentials and identify you to log in to the Site;
 - Personalize your experience on the Site;
 - Send you marketing communications about services and products offered by us and our affiliated companies, as permitted by law;
 - Improve the Site, your personal information may be analyzed to search for patterns which may help improve the overall Site experience;
 - Improve the customer service we provide, your personal information may be used for review and quality control purposes;
 - Authenticate your credit or debit card account information;
 - Create de-identified personal information to be used by us; and
 - Use for any other reason you consent to.

Except as specifically set forth in this Privacy Policy, Red Aspen DOES NOT share Personal Information. Red Aspen may share aggregated information from time to time with its partners, vendors or other third parties. When such aggregate information is shared by Red Aspen, it is deidentified and no Personal Information is shared.

- **Disclosure Practices.** Except under the following circumstances and otherwise as set forth in this Privacy Policy, Red Aspen will keep your Personal Information private and will not sell it to or share it with third parties.
 - **Disclosure in Connection with Services.** Red Aspen discloses Personal Information to those who help it provide Services, including those who perform technical, administrative and data processing tasks such as hosting, billing, fulfillment, and data storage and security.
 - **By Law or to Protect Rights.** Red Aspen discloses Personal Information when required to do so by law, or in response to a subpoena or court order, or when Red Aspen believes in its sole discretion that disclosure is reasonably necessary to protect the property or rights of Red Aspen, third parties or the public at large.
 - **Legally Required Law Enforcement, Judicial and Administrative Agency Disclosures.** Red Aspen will provide confidential and personally identifiable information as necessary to comply with judicial and administrative orders, subpoenas, Civil or Criminal Investigative Demands, Administrative and Regulatory Demands and other legal obligations. In order for Red Aspen to conduct business in certain jurisdictions, Red Aspen must disclose certain personally

identifiable and confidential information to regulatory authorities in such jurisdictions. Such information may include, but is not limited to, income information and personally identifiable information.

- **Business Transfers; Bankruptcy.** Red Aspen reserves the right to transfer all Personal Information in its possession to a successor organization in the event of a merger, acquisition, or bankruptcy or other sale of all or a portion of Red Aspen's assets. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred Personal Information will be subject to this Privacy Policy, or to a new privacy policy if you are given notice of that new privacy policy and an opportunity to affirmatively opt-out of it. Personal Information submitted or collected after a transfer, however, may be subject to a new privacy policy adopted by Red Aspen's successor organization.
- **Unpaid Accounts.** If you fail to pay any balance owed to Red Aspen, we may, as permitted by law, report your Personal Information, including without limitation your unpaid balance, to consumer credit reporting services, collection agencies and others.
- **Invite a Friend.** When you invite family or friends to join the Red Aspen network or to attend a Red Aspen home party, Red Aspen will send an email on your behalf to the indicated recipient. Your name and email address will appear in the "From" line of such email.
- **Lead Assignment and Brand Ambassador Locator Features.** Red Aspen occasionally will assign prospective sales and prospective customer and Brand Ambassador leads to Brand Ambassadors. In these cases, we will provide the prospective customer or Brand Ambassador with the appropriate Brand Ambassador's name and contact information and/or provide a Brand Ambassador with the prospective customer's or Brand Ambassador's name and contact information.
- **Downline Activity/Genealogy Reports.** As a network marketing company, Red Aspen provides certain information to Brand Ambassadors regarding other Brand Ambassadors and customers enrolled in a Brand Ambassador's downline marketing organization (sales team). To help Brand Ambassador in Red Aspen's network marketing program manage their independent businesses, we provide our Brand Ambassadors with some of the Personal Information of the other Brand Ambassadors and customers whom they have personally sponsored/enrolled as well as other Brand Ambassadors who are on their marketing teams. If you enroll as a Brand Ambassador or register as a Red Aspen customer, your name, address, telephone number, and email address, as well as data relating to your sales, purchases, and recruitment activity will be disclosed to the Brand Ambassador who sponsored you and to other Brand Ambassadors who are upline to you and your sponsoring Brand Ambassador. No other Personal Information will be shared with Brand Ambassadors. Such information is shared via the Brand Ambassador Back-Office. Information relating to downline Brand Ambassadors is made available to Brand Ambassadors subject to a confidentiality and non-solicitation covenant in the agreement that each Brand Ambassador enters into with Red Aspen. However, Red Aspen does not warrant that other Brand Ambassadors will adhere to the confidentiality and non-solicitation covenants, and Red Aspen shall not be responsible for Brand Ambassadors' violation of these covenants. By enrolling as a Brand Ambassador or registering as a Red Aspen customer, you consent to the disclosure of your Personal Information as described in this paragraph.
- **Surveys.** It may become necessary to conduct surveys of our customers or Brand Ambassadors. Should we deem it necessary to conduct a survey, we may outsource the survey to a third party. We will provide the third-party survey company with your Personal

Information as is necessary for the third-party survey company to conduct the survey and to those third parties whom we engage to review and analyze the results of the survey. We will not provide your social security number, credit card or banking information to the survey provider.

Retention of Personal Information

Unless there is something in this Policy to the contrary, we may retain your Personal Information for as long as your account is active and for a period of time thereafter to allow you to re-activate your account without loss of information. We may also retain your Personal Information as necessary to comply with legal requirements and obligations, defend our rights, resolve conflicts, improve the Site, address complaints, and enforce contracts.

Electronic Communications

Consistent with this Privacy Policy and as is permitted by applicable law, we may communicate with you via electronic messages, including email. We receive notice when you open an email or click a link within a marketing email.

Online Advertising

We may display advertising on the Site and partner with third parties to manage advertising on other websites for our products and services. We may also partner with third parties, including business partners, advertising networks, and other advertising service providers, who gather information about you on the Site and other websites to provide you with advertisements on the Site and elsewhere online based on your browsing history and tailored to your interests, preferences, and characteristics. Cookies or other similar technologies may be used to provide you with advertising based upon your browsing activities and interests. We are not responsible for the privacy practices of these third parties, and the information practices of these third parties are not covered by this Policy.

Some third parties collect information about users of the Site to provide interest-based advertising on the Site and elsewhere, including across browsers and devices. These third parties may use the information they collect on the Site to make predictions about your interests in order to provide you with ads (from us and other companies) across the Internet. Some of these third parties may participate in industry-developed programs designed to provide consumers with choices about whether to receive targeted advertising. Due to differences between using apps and websites on mobile devices, you may need to take additional steps to disable targeted ad technologies in mobile apps. Many mobile devices allow you to opt out of targeted advertising for mobile apps using the settings within the mobile app or your mobile device. For more information, please check your mobile settings. You also may uninstall our apps using the standard uninstall process available on your mobile device or app marketplace.

To opt out of interest-based advertising across browsers and devices from companies that participate in the Digital Advertising Alliance or Network Advertising Initiative opt-out programs, please visit the websites operated by the Network Advertising Initiative (<http://www.networkadvertising.org/choices/>) and the Digital Advertising Alliance (<http://www.aboutads.info/choices/>). You may also be able to opt out of interest-based advertising through the settings within the mobile app or your mobile device, but your opt-out choice may apply only to the browser or device you are using when you opt out, so you should opt out on each of your browsers and devices if you want to disable all cross-device linking for interest-based advertising. Please note that even if you use an industry-based opt-out for interest-based

advertising, you will continue to receive generic advertisements and your experience on the Site may be degraded.

Miscellaneous

- **Dispute Resolution.** This privacy policy is governed by the laws of the State of Idaho. The offer extended by this Agreement, and any acceptance of its terms, shall occur in Ada County, State of Idaho. Any dispute arising from or relating to this privacy policy shall be brought in the courts of the State of Idaho residing in Ada County. 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 the 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 the Site is also a Brand Ambassador or Affiliate and combines claims under this privacy policy with claims that are subject to the Red Aspen Brand Ambassador Agreement or Affiliate Agreement, the dispute resolution provisions of the Brand Ambassador Agreement or Affiliate Agreement shall govern.
- **Links.** The Site may contain links to other websites. Please be aware that Red Aspen is not responsible for the privacy practices of such other websites. We encourage users to be aware when they leave the Site and to read the privacy statements of each and every website that collects Personal Information. This privacy statement applies solely to information collected by the Site.
- **Text Message Service.** If you sign up for our text messaging service or programs, , you agree to our Messaging Terms (https://terms.pscr.pt/legal/shop/red-aspen-online/terms_of_service) and Messaging Privacy Policy (https://terms.pscr.pt/legal/shop/red-aspen-online/privacy_policy).
- **Security.** Red Aspen has implemented and maintains reasonable security procedures and practices to protect against the unauthorized access, use, modification, destruction, or disclosure of your Personal Information.
- **Do-Not-Track Requests.** "Do-Not-Track" is a web browser setting that sends a signal instructing a website not to track a user. The Site does not have a mechanism to respond to "Do-Not-Track" requests.
- **Lost or Stolen Information.** You must promptly notify us if your credit, banking, other financial information, username, or password is lost, stolen, or used without permission. In such an event, we will remove that credit card number, bank account information, other financial institution information, username, or password from your account.
- **Promotional Activities.** From time to time, Red Aspen may conduct contests, giveaways, and other promotions (collectively, "Promotional Activities"). Any information submitted in connection with Promotional Activities will be treated in accordance with this Privacy Policy. From time to time, Red Aspen may also ask you to participate in surveys designed to help Red Aspen improve the Site, its products, services, or the Red Aspen network marketing program. Any Personal Information provided to Red Aspen in connection with any survey will be used only in relation to that survey and will be disclosed to third parties not bound by this Privacy Policy only in aggregated form.
- **Changes to this Privacy Policy.** Red Aspen reserves the right to amend or change this Privacy Policy at any time at its sole discretion. It is your responsibility to periodically access this Privacy Policy by clicking on the [Privacy Policy](#) link at our home page. You can determine the date this Privacy Policy was last updated by referring to the effective date found at the end of the policy.

When material changes or amendments are made to the Privacy Policy, we will announce the same at our home page for a period of 30 days following implementation of the amended Privacy Policy.

- **Making Changes to Your Personal Information.** Brand Ambassadors, Affiliates, and registered customers may update their Personal Information as necessary by logging into their Red Aspen online Back Offices or accounts, which allows them to access and edit their registration account information. In addition, Brand Ambassadors, Affiliates, and Registered Customers may contact us at hello@redaspen.com to update their profiles.
- **Online Privacy Policy Only.** Except as may otherwise be provided herein, this Privacy Policy applies only to information collected through the Site. It does not apply to information collected offline.
- **Questions.** Questions regarding this Privacy Policy should be directed to hello@redaspen.com.

Supplemental Privacy Notice for California Residents. The following applies solely to California residents.

Effective: August 27, 2023.

Last Revised: August 27, 2023.

Shine the Light.

Residents of the State of California (under California Civil Code Section 1798.83) have the right to request and obtain from us once per calendar year information, if any, regarding their Personal Information as defined in California Civil Code Section 1798.83 that we have shared with third parties during the preceding year for such third parties' direct marketing purposes. The information will include (1) a list of the categories of Personal Information described in California Civil Code section 1798.83(e)(6) that were disclosed in during the preceding calendar year, if any, and (2) the names and addresses of all third parties with whom we shared any such personal information about you during the preceding calendar year (if the nature of such a third party's business cannot reasonably be determined from the third party's name, a description of the nature of the third party's business or examples of products and services that the third party marketed). To make such a request, please email us at hello@redaspen.com. You must include the name of this Site and "California Resident" as the subject line, and your full name, email address, and postal address in your message. Please note that any request under this paragraph will be limited to our use and disclosure of your personal information.

California Consumer Privacy Act Notice.

If you are a California resident, you may have certain rights under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020, and any implementing regulations adopted thereunder (collectively, the "CCPA") as described below. Terms (including defined capitalized terms) used in this California Consumer Privacy Act Notice have the same meanings given in the CCPA and the associated regulations, unless otherwise defined herein.

Notice of Collection and Use of Personal Information

We may collect (and may have collected during the 12-month period prior to the effective date of this Supplemental Privacy Notice) the following categories of personal information about you:

- Identifiers: identifiers such as name, date and place of birth, permanent residence, home and business addresses, email address, telephone numbers, unique personal identifiers, online identifiers, Red Aspen Brand Ambassador ID, Red Aspen Customer ID, Red Aspen Independent Affiliate ID, account name, signature, Social Security number, tax ID number, Internet Protocol address, and driver's license, state identification card, or passport numbers.
- Protected Classifications: characteristics of protected classifications under California or federal law, such as race, national origin, age, sex, or gender.
- Financial Information: bank account number, credit card number, debit card number, and similar banking information
- Commercial Information: commercial information such as transaction data, products or services purchased, obtained or considered, and other purchasing or consuming histories or tendencies.
- Health and Medical Information: information that you voluntarily provide in response to surveys or questionnaires, including physical characteristics or descriptions, and other data related to your body, diet, activities, or physiology.
- Biometric Information: biometric information such as facial geometry.
- Online Activity: Internet or other electronic network activity information, such as browsing history, search history or information regarding your interaction with websites, applications or advertisements.
- Geolocation Data: general location and precise GPS location.
- Sensory information: audio, electronic, visual and similar information, such as audio recordings if you call our customer service, or recorded presentations in which you participate; photographs taken at Company functions or events; audio, electronic, visual, thermal, olfactory, or other similar information from your voluntary participation in any sensory testing of Red Aspen products.
- Professional or Education information.
- Inferences: inferences drawn from any of the information identified above, such as individual profiles, preferences, characteristics, or behaviors.

We may use (and may have used during the 12-month period prior to the effective date of this Supplemental Privacy Notice) the categories of personal information listed above for the purposes described in our Privacy Policy, and for the following business or commercial purposes (as those terms are defined in applicable law):

- Our or our service provider's operational purposes;
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Helping to ensure security and integrity (such as detecting, protecting against, and prosecuting security incidents and fraudulent or illegal activity);
- Debugging to identify and repair errors that impair existing intended functionality;
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with us;
- Providing advertising and marketing services;
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage or providing similar services;

- Undertaking internal research for technological development and demonstration;
- Undertaking activities to verify or maintain the quality or safety of a service or device or to improve, upgrade or enhance the services or devices;
- Other uses that advance our commercial or economic interests, such as third-party advertising and communicating with you about relevant offers from third-party partners;
- Other uses about which we notify you.

Examples of these types of uses include:

- Providing you with the products, services, and support you request;
- Processing your transactions and shipping orders;
- Communication with you about your account or transactions, changes to our policies and other administrative matters, or your questions and comments;
- To better understand your interests in order to provide you with promotional information, relevant content, product recommendations, surveys, questionnaires, and other materials;
- Improving our products, services and operations;
- Conducting data analytics;
- Administering rewards programs;
- Providing personalized services you request;
- Ensuring compliance with our Company policies and the law, or as we believe is necessary to protect, enforce or defend the legal rights, privacy, safety or property of ourselves and others;
- To validate sales made by Red Aspen Independent Brand Ambassadors and Red Aspen Independent Affiliates (hereafter collectively “Representative”);
- To help our Representatives search for, communicate with and validate customers in our systems;
- For Red Aspen’s compliance purposes;
- To support the operations of our Representatives, and to maintain proper functioning of the Red Aspen network marketing and affiliate marketing programs.

Sources of Personal Information

During the 12-month period prior to the effective date of this Supplemental Privacy Notice, we may have obtained personal information about you from the following categories of sources:

- Directly from you, such as when you complete forms, take surveys, or create profiles on our Sites
- From your devices, such as through your use of our services
- Representatives
- Merchants
- Our parent company, affiliates and subsidiaries
- Vendors or Service Providers who provide services on our behalf
- Our business partners
- Social networks
- Data analytics providers
- Public and commercially available sources

Disclosure of Personal Information

We may disclose personal information to the following categories of third parties:

- Representatives
- Merchants
- Our parent company, affiliates and subsidiaries
- Vendors or Service Providers who provide services on our behalf
- Professional services organizations, such as auditors or law firms
- Data analytics providers
- Our business and joint marketing partners
- Social networks
- Online advertising services and advertising networks
- Financial institutions

During the 12-month period prior to the effective date of this Supplemental Privacy Notice, we may have disclosed the following categories of personal information (as defined above) about you for a business purpose to the following categories of third parties:

- Identifiers: Service providers, Affiliates and Subsidiaries, Representatives, Merchants, financial institutions, Professional services organizations, online advertising services and advertising networks, social networks
- Protected Classifications: Service providers, Affiliates and Partners
- Financial Information: Service providers, Merchants, Financial Institutions
- Commercial Information: Service providers, Affiliates and Partners, Representatives, Merchants
- Health and Medical Information: Service providers, Affiliates and Partners, Representatives
- Online Activity: Service Providers, Affiliates and partners, Advertising services and advertising networks, social media networks
- Geolocation Data: Service providers, Affiliates and partners
- Sensory information: Service providers, Affiliates and partners
- Professional or Education information: Service providers, Affiliates and partners, Representatives
- Inferences: Service providers, Affiliates and partners

In addition to the categories of third parties identified above, during the 12-month period prior to the effective date of this Supplemental Privacy Notice, we may have disclosed personal information about you to government entities (e.g., in response to law enforcement requests or in connection licensing or registration requirements).

“Sale” or “Sharing” of Personal Information

California law defines “sale” very broadly and includes the disclosure of personal information for anything of value. **We do not sell your personal information in exchange for monetary consideration.** We may disclose your personal information by allowing certain third parties (such as social media networks, data analytics providers, and online marketing and advertising services) to collect personal information via automated technologies (such as cookies or pixels) on our Site for social networking and advertising purposes. Under applicable law, these kinds of disclosures may constitute “targeted advertising,” or a “sale” when the personal information is exchanged for non-monetary consideration, or “sharing” when the personal information is disclosed for cross-context behavioral advertising purposes.

The categories of personal information that we may sell, share, or use for targeted advertising (and may have sold or shared or used for targeted advertising during the 12-month period prior to the effective

date of this Notice) includes Identifiers, Commercial Information, Online Activity, device and site usage information, and Geolocation data.

California residents may opt-out of the processing of their personal information for purposes of targeted advertising, or the sale or sharing of personal information, by clicking on the Do Not Sell or Share My Personal Data/Opt-Out of Targeted Advertising link at the bottom of each page of the Site and following the instructions in that link.

In addition, California residents may use an opt-out preference signal, such as the Global Privacy Control (“GPC”), to opt-out of the sale or sharing of your personal data. If you choose to use a browser that supports the GPC signal, you will need to enable it for each supported browser that you use on your device. If enabled and broadcasting a signal to not sell or share your data, the GPC will be applied to your browser. If you are logged into your Red Aspen account while a GPC is enabled on your browser, it will be applied to your account while logged into the site and using that same browser. We otherwise do not associate your devices or browsers with any user account. If you clear your cookies or use a private browsing mode, such as “incognito mode,” and later visit our sites, you will need to have your GPC enabled for the GPC to be applied again to your browser.

Retention of Personal Information

We will retain your personal information for the time period reasonably necessary to achieve the purposes described in our Privacy Policy and this Supplemental Privacy Notice, or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.

Users Under 16

We do not knowingly sell or share Personal Information of California Consumers younger than 16.

California Consumer Privacy Rights

If you are a California resident, you have certain rights regarding your personal information, as described below.

- **Access:** You have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed and sold or shared about you during the past 12 months.
- **Correction:** You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.
- **Deletion:** You have the right to request that we delete certain personal information we have collected from you. Please note that we need certain types of information so that we can provide the services to you. If you ask us to delete it, you may no longer be able to access or use our Sites.
- **Opt-Out of Sale or Sharing:** You have the right to opt out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising purposes.

How to Submit a Request.

Some of our Sites allow you to review and update your personal information or cancel certain provisions of your Red Aspen Brand Ambassador Agreement. To submit a request to access, correct or delete your personal information or for assistance with any of these rights, please submit your request [here](#) or contact

us at (844) 402-3457. Additionally, you may, if you wish, email your request to us at hello@redaspen.com. If you email us, you must: (i) clearly state your request, and (ii) for verification and fraud-prevention purposes, provide the following information that you initially provided to Red Aspen: *first name, last name, phone number, billing zip code, and email address*. You will receive an email from us confirming your request and requesting you to click a button in the email to confirm your identity, in accordance with the CCPA. Once you confirm your identity by clicking the button in the email, we will proceed with processing your request.

To opt-out of the sale or sharing of your personal information, please see the instructions in the section entitled ““Sale” or “Sharing” of Personal Information” above.

Verifying Requests.

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. This verification process may require you to provide your Representative or Customer ID, or other pieces of personal information that we already hold on you, or, in certain circumstances, a signed declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If you designate an authorized agent to make a request on your behalf, please email us at hello@redaspen.com to (1) verify your identity directly with us and (2) provide us with written authorization or a power of attorney, signed by you, for the agent to act on your behalf.

Right to Appeal

If, for any reason, you would like to appeal our decision relating to your request under this California Consumer Privacy Act Notice, you may submit an appeal and do so by emailing hello@redaspen.com. Please include your full name, the basis for your appeal, and any additional information to consider.

Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights

We do not discriminate against consumers as a result of a consumer’s exercise of any of his or her rights listed in this section. For example, we will not, as a result of a consumer’s exercise of any rights listed in this section:

- Deny goods or services to the consumer;
- Charge different prices or rates for goods or services;
- Provide a different level or quality of goods or services; or
- Suggest in any way that a consumer will receive a different price or rate for goods or services or a different level or quality of goods or services.

We may provide discounts or other incentives to customers who provide us with certain of their Personal Information. For example, we may offer a discount to a consumer who provides her contact information and payment information in order to register with us.

Notice of Finance Incentive

Under California law, certain aspects of loyalty and similar programs which we may offer from time to time, may provide certain benefits to consumers and be considered a financial incentive program. We may collect personal information from you in connection with any such programs, e.g., contact information (name, email address, residential address) and commercial information (like purchase history) for a number of reasons, including to administer the program, contact you with regard

to your account (if any), to provide the benefits to you, to better serve you, and to fulfill your requests associated with the program.

To opt into our loyalty or similar programs, as set forth herein you will need to provide certain information, and potentially register for an account, agree to certain applicable program terms, or otherwise follow the instructions associated with the loyalty or other similar programs.

To the extent that Red Aspen provides programs that may be considered a financial incentive because the program is directly or reasonably related to the collection, deletion or retention of consumer personal information, the value is reasonably related to the overall value we receive from the personal information participants provide specific to the program minus the costs and expenses we incur in providing the program.

Changes to this Supplemental Privacy Notice

We reserve the right to amend this Supplemental Privacy Notice at our discretion and at any time. When we make changes, we will post the updated Supplemental Privacy Notice on the website and update the effective date. Your continued use of our website following the posting of changes to this Supplemental Privacy Notice constitutes your acceptance of such changes.

Questions and Contact Information

If you have any questions about your rights under the CCPA, please email us at hello@redaspen.com.

Supplemental Privacy Notice for Nevada Residents. The following applies solely to Nevada Residents.

Residents of Nevada have certain rights with respect to your Personal Information.

- You have the right to know that we do not sell any of your Personal Information to any third party or parties.
- You have the right to request that we not sell any of your Personal Information. Although we do not sell your Personal Information to any third parties, you have the right to submit a request to us directing us not to sell any of your Personal Information that we have collected from you or will collect from you in the future to any third party or parties. You may make such a request by sending an email to us at hello@redaspen.com. Please include the following information in your request: Your name, your email address, and, if applicable, your Brand Ambassador ID Number, Affiliate ID Number, or Customer ID Number. Upon our receipt and verification of your identity, we will not sell your Personal Information. Within 60 days of our receipt of your request, we will respond to you.
- We collect the following types of Personal Information (“Covered Information”) from visitors who purchase products from us or enroll as Brand Ambassadors or Affiliates through our Site:
 - First name, middle name or middle initial, and last name;
 - Home or other physical mailing address;
 - Credit card or other payment information;
 - Email address;
 - Telephone number; and
 - Social Security Number (Brand Ambassadors and Affiliates Only).
- We share Covered Information only as specified in our Privacy Policy.

- If you wish to review, update or otherwise make changes or request that changes be made to the Covered Information you have provided to us, you may do so as specified in “Making Changes to Your Personal Information” above.
- If we ever change the types of Covered Information that we collect from you, with whom we share it, or the process by which you may review and request or make changes to your Covered Information that is collected and maintained by us, we will notify you as described in the “Changes to this Privacy Policy” above.
- No third party or third parties may collect Covered Information about your online activities over time when you use any of our Websites.