

# California Consumer Privacy Act Disclosures

Last Modified: 4 December 2023

This notice and policy ("CCPA Disclosures") supplement information contained in privacy notices from Vitamin Well LLC, including its subsidiaries and affiliates ("Company") and applies solely to residents of the State of California ("consumers" or "you"). Company adopts this notice and policy to comply with the California Consumer Privacy Act of 2018, as amended from time to time ("CCPA") and the California Privacy Rights Act of 2020 ("CPRA"), as amended from time to time. Any terms defined in the CCPA or the CPRA have the same meaning when used in this notice and policy. This notice and policy does not reflect our collection, use, or disclosure of California residents' personal information where an exception under the CCPA and CPRA applies.

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## Notice at Collection Online

We have set out below categories of personal information we collect about California residents. For each category of personal information we have collected, we have included the reference to the enumerated category or categories of personal information in California Civil Code § 1798.140(v)(1) and (ae)(2) that most closely describe such personal information.

Corresponding reference to category of personal information under CCPA definition of personal information	Category of personal information
A. Identifiers.	First and last name, delivery address/billing address, telephone number, e-mail address, account name, order information, payment details, payment history, credit card information and payment reference number. IP address in relation to order data.
B. Personal information categories listed in the California Customer Records Act (Cal. Civ. Code § 1798.80(e)).	First and last name, address, telephone number, bank account number, credit or debit card number, other financial information.
C. Characteristics of protected classifications under California or federal law.	Gender.
D. Commercial information.	Email address, shipping address, order number, purchased products, shopping history.

<b>F. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with an Internet Web site, application, or advertisement.</b>	Times of visit, pages visited, time spent on each webpage; referring site details; type of web browser; type of operating system; flash version, JavaScript support, screen resolution, and screen color processing ability; network location and IP address; clicks on links leading to external Sites; user errors; clicks on videos; scroll depth; interactions with specific widgets; order data; HTTP headers; pixel specific data; button click data; optional values; form field names.
<b>G. Geolocation data.</b>	Geolocation.
<b>I. Professional or employment-related information.</b>	First and last name, date of birth, job qualifications, home address, education, financial statements, phone number, criminal background, electronic signature, government issued identification.
<b>K. Inferences drawn from any of the information.</b>	Predictions of interests or inferences.
<b>Corresponding reference to category of sensitive personal information under CCPA</b>	<b>Category of sensitive personal information</b>
<b>2.B. Personal information collected and analyzed concerning a consumer’s health.</b>	Allergies or other health conditions.

Company only uses your sensitive personal information for purposes referenced at Subsection 1798.121(a) of the CCPA, namely to perform the services or provide the goods reasonably expected by an average California resident who requests those goods or services, and Company does not use sensitive personal information to infer characteristics about you.

Company collects, uses, retains, and discloses your personal information for the purposes described below:

- To provide you with products and services, such as to: fulfill your orders and process your payments; process, maintain and service your account(s);
- Register an account, manage customer relationship, communicate with you, and send marketing communications;
- Measure consumer response to online content, identify consumer interests for marketing purposes, and personalize web content;
- Handle and record consumer rights requests, including opt-ins and opt-outs;
- Monitor, protect and improve Company security assets and resources, including devices, systems, customer data, infrastructure, and Company’s network; and
- Comply with laws, regulatory requirements and to respond to lawful requests, court orders and legal processes.

We do not monetize personal information about California residents in the sense of exchanging personal information for money. However, we disclose certain personal information to advertising networks and their partners to provide you with more interesting and customized information, promotions, and advertising, which is considered “selling” and “sharing” under the CCPA. This information includes California residents’ unique personal identifier, online identifier, IP address, browsing history, information regarding a consumer’s interaction with an internet website, or advertisement, geolocation data, and inferences about your interests, email address, address and purchasing history. To opt-out of such “sales” and “sharing”, please follow the instructions in our notice of right to opt-out of selling/sharing here: [“Do Not Sell or Share My Personal Information // Your Opt-Out Rights.”](#) If you opt out of “sharing”, we may continue to disclose your personal information to third parties for purposes outside of cross-context behavioral advertising. In addition, if you opt out of “selling” and “sharing”, you may still be presented with contextual and other advertisements that are not based on cross-context behavioral analysis.

We retain each of the categories of personal information collected under this Notice at Collection as long as necessary to fulfill the purposes for which it was collected in accordance with the general Privacy Policy and these CCPA Disclosures, provide the services you requested from us, resolve any disputes with you, enforce our agreements with you, and comply with applicable laws. Please find our CCPA Privacy Policy directly below.

## CCPA Privacy Policy

### 1. Information Practices over the Preceding 12 months

We have set out below the categories of “personal information” and “sensitive personal information” (as defined by the CCPA) that we have collected about California residents in the preceding 12 months and, for each category of personal information collected, the categories of sources from which that information was collected, whether we “sold” or “shared” such personal information and to whom and for what purpose if so, and other categories of third parties to whom we disclosed the personal information and the purposes of such disclosures. The table is followed by a description of the purposes for which we collected personal information. “Consumer” refers to a California resident.

Please note that we do not monetize personal information about California residents in the sense of exchanging personal information for money. However, as detailed in the table below, we disclosed certain personal information to advertising networks and their partners to provide the you with more interesting and customized information, promotions, and advertising, which is considered “selling” and “sharing” under the CCPA.

Categories of personal information	Did we collect? If so, from what source?	Did we sell or share? If so, to whom and for what purpose?	Did we disclose apart from selling or sharing? If so, to whom and for what purpose?
<b>General categories of “personal information” as defined under the CCPA</b>			
Identifiers such as a real name, postal address, unique personal identifier, online identifier,	Yes, from California residents directly, third parties including service	Yes, we “sold” and “shared” California residents’ unique personal identifier,	Yes, to our affiliates and service providers in order to receive services, facilitate corporate transactions, and comply with the law.

<p>account name, Internet Protocol address, email address, or other similar identifiers.</p>	<p>providers, social media platforms and networks, and automatically via cookies and other technology.</p>	<p>online identifier, IP address and email address to third-party advertising networks. The purpose was so that they can provide you with cross-context behavioral advertising. This will also be used to gather statistical data for analysis purposes.</p>	
<p>Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, address, telephone number, bank account number, credit card number, debit card number, or any other financial information.</p>	<p>Yes, from California residents directly, third parties including service providers, social media platforms and networks, and automatically via cookies and other technology.</p>	<p>Yes, we “sold” and “shared” California residents’ e-mail address, name, address and telephone number to third-party advertising networks. The purpose was so that they can provide you with cross-context behavioral advertising.</p>	<p>Yes, to our affiliates and service providers in order to receive services, facilitate corporate transactions, and comply with the law.</p>
<p>Characteristics of protected classifications under California or federal law, such as gender.</p>	<p>No.</p>	<p>No.</p>	<p>No.</p>
<p>Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>Yes, from California residents directly, third parties including service providers, social media platforms and networks, and automatically via cookies and other technology.</p>	<p>Yes, we “sold” and “shared” California residents’ records of products, obtained, or considered, or other purchasing or consuming histories or tendencies to third-party advertising networks. The purpose was so that they can</p>	<p>Yes, to our affiliates and service providers in order to receive services, facilitate corporate transactions, and comply with the law.</p>

		provide you with cross-context behavioral advertising. This will also be used to gather statistical data for analysis purposes.	
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.	Yes, from California residents directly, third parties including service providers, social media platforms and networks, and automatically via cookies and other technology.	Yes, we "sold" and "shared" California residents' information regarding a consumer's interaction with an internet website, or advertisement to third-party advertising networks. The purpose was so that they can provide you with cross-context behavioral advertising. This will also be used to gather statistical data for analysis purposes.	Yes, to our affiliates and service providers in order to receive services, facilitate corporate transactions, and comply with the law.
Geolocation data.	Yes, from California residents directly, third parties including service providers, social media platforms and networks, and automatically via cookies and other technology.	Yes, we "sold" and "shared" California residents' geolocation data to third-party advertising networks. The purpose was so that they can provide you with cross-context behavioral advertising. This will also be used to gather statistical data for analysis purposes.	Yes, to our affiliates and service providers in order to receive services, facilitate corporate transactions, and comply with the law.
Inferences drawn from any of the information identified in this subdivision to	Yes, we make inferences about	Yes, we "sold" and "shared" California residents'	Yes, to our affiliates and service providers in order to receive services,

create a profile about a consumer reflecting the consumer's preferences.	California residents' interests.	inferences about their interests to third-party advertising networks. The purpose was so that they can provide you with cross-context behavioral advertising.	facilitate corporate transactions, and comply with the law.
<b>Categories of "sensitive personal information" as defined by the CCPA</b>			
Personal information collected and analyzed concerning a consumer's health.	No.	No.	No.

Company may also access, transfer, disclose, and preserve personal information when doing so is necessary to: comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies; operate and maintain the security of Company's systems, including to prevent or stop an attack on our computer systems or networks; protect the rights or property or ourselves or others, including enforcing our agreements, terms, and policies; or act in urgent circumstances such as protecting the health or personal safety of an employee or worker, agent, customer, user of Company's products or services, or member of the public.

If you are a California resident, we used your personal information (other than sensitive personal information) for the following purposes, and disclosed such personal information to our service providers to help us achieve such purposes:

- To provide you with products and services, such as to: fulfill your orders and process your payments; process, maintain and service your account(s);
- Register an account (if such function is provided), manage customer relationship, communicate with you, and send marketing communications;
- Measure consumer response to online content, identify consumer interests for marketing purposes, and personalize web content;
- Handle and record consumer rights requests, including opt-ins and opt-outs;
- Monitor, protect and improve Company security assets and resources, including devices, systems, customer data, infrastructure, and Company's network; and
- Comply with laws, regulatory requirements and to respond to lawful requests, court orders and legal processes.

We only use your sensitive personal information for purposes referenced at Subsection 1798.121(a) of the CCPA, namely to perform the services or provide the goods reasonably expected by an average California resident who requests those goods or services, and we do

not use sensitive personal information to infer characteristics about you. We do not have actual knowledge that we “sell” or “share” the personal information of minors under 16 years of age.

## 2. CCPA Rights

As a California resident, you have the following rights under the CCPA, subject to the conditions in the CCPA:

- **Right to know** about personal information collected, disclosed or sold: You have the right to request what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.
- **Right to request deletion** of personal information: You have a right to request the deletion of personal information that we collect or maintain about you.
- **Right to correct** inaccurate personal information: You as a consumer may request us to correct inaccurate personal information about you, taking into account the nature of the personal information and the purposes of the processing of the personal information. If we receive a verifiable consumer request to correct inaccurate personal information, then shall we use commercially reasonable efforts to correct the inaccurate personal information as directed by you.
- **Right to opt-out** of the sale or share of your personal information: Company does not provide personal information about you to other companies for money, but to help us market or advertise to you. When this information is in a format that directly identifies you by name, it is generally not shared with any companies for third-party marketing or advertising purposes. Even though Company does not provide personal information to these companies for money, California law may characterize such sharing of information to personalize your experience as a “sale” of personal information. To exercise this right, please click on the following link and follow the instructions: [“Do Not Sell or Share my Personal Information// Your Opt-Out Rights”](#).
- **Right to limit** our use and disclosure of sensitive personal information to purposes specified at Subsection 1798.121(a) of the CCPA: We do not use or disclose sensitive personal information for purposes other than those specified at Subsection 1798.121(a) of the CCPA.
- **Right to non-discrimination** for the exercise of CCPA/CPRA rights: You may not be discriminated against because you exercise any of your rights under the CCPA/CPRA in violation of California Civil Code § 1798.125.

## 3. How to Exercise CCPA Rights

- **Methods of Submission and Instructions:** To submit a request to exercise the right to know, delete or correct, please submit an email request to [dpo@vitaminwell.com](mailto:dpo@vitaminwell.com) and include “California Request to [Know/Delete/Correct]” in the subject line or call our toll-free number at (888) 910-0273. Clearly specify the nature of your request, including the personal information about you that you would like to know, the personal information about you that you would like to have deleted, or the personal information about you that you would like to have corrected. To opt-out of the sale

or sharing of personal information, please click on the following link and follow the instructions: [“Do Not Sell or Share My Personal Information // Your Opt-Out Rights”](#).

- **Verification:** Company is required verify your identity. The information that Company asks you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once confirmed, Company will respond to your request in accordance with the CCPA/CPRA. Company will provide an explanation for denying a request.
- **Opt-Out Signals:** Company responds to opt-out preference signals communicated via the Global Privacy Control and will process such signals with respect to the browser or signal communicating the signals or, if you have signed onto your Company account while communicating Global Privacy Control opt-out preference signals, you specifically. To use Global Privacy Control opt-out preference signals, please follow the instructions here: <https://globalprivacycontrol.org/>.
- **Authorized Agents:** You can designate an authorized agent to make a request under the CCPA/CPRA on your behalf if:
  - The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
  - You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps above:

- Mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf to [dpo@vitaminwell.com](mailto:dpo@vitaminwell.com); and
- Provide any information Company requests in our response to your email to verify your identity. The information that Company asks you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

#### **4. Contact Information**

If you have any questions or comments about this notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, please do not hesitate to contact us at:

Postal address: Vitamin Well LLC located at c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, New Castle County, Delaware 19808, United States

Email: [dpo@vitaminwell.com](mailto:dpo@vitaminwell.com)