



# Privacy Policy

## INFORMATION COLLECTION

Pure Haven Essentials, LLC (referred to herein as "Pure Haven Essentials", "PHE", "our", "us" or "we") is the sole owner of the information collected on our websites and on the replicated PHE websites that we provide for use by independent contractor Consultants (hereafter the "websites"). We collect information from Independent Consultants ("Consultants"), customers and visitors to the websites at different points on the websites.

### Personally Identifiable Information

Through your use of or visits to our websites, you may voluntarily provide or be required or requested to provide personally identifiable information to us. Personally identifiable information is any piece of information which can potentially be used to uniquely identify, contact, or locate a single person including names, addresses, email addresses, telephone numbers, social security and tax identification numbers, and credit card and bank information.

### Non-Personally Identifiable or Aggregate Information

To help us tailor the websites to the needs and interests of our visitors, we may collect various types of information from you that do not identify you personally such as the products you purchase, the services you use, the frequency of such purchase and uses, the type of browser you are using (e.g., Firefox, Internet Explorer), the type of operating system you are using (e.g., Windows XP or Mac OS X), the domain name of your Internet service provider (e.g., Comcast, EarthLink), the length of time you spend on the websites, which pages you visited within the websites, which site you visited before coming to ours, and which site you accessed when you left the websites (collectively, "non-personally identifiable information").

### Customer Registration

Certain customers may be required to register in order to purchase products directly from us ("Registered Customers"). Registered Customers will be required to provide contact information (such as name, mailing address, telephone number(s), and email

address) and payment information (such as credit card information). We use this information to maintain contact information for Registered Customers and Registered Customer orders.

### **Product or Service Purchases**

When a customer or Registered Customer purchases products or services from us through any of our websites, the purchaser must provide us with mailing and contact information as well as payment information. This information is used for billing and payment purposes and to fill orders.

## **INFORMATION USE**

### **Personally Identifiable Information**

We may use the personally identifiable information (a) to protect and defend our rights or properties, (b) to protect your personal safety and the general safety of our users and the public in general (whether in emergency situations or otherwise), (c) to provide to third parties to maintain and/or operate the websites, (d) to give to our business partners and third party vendors that provide services or products selected by you, (e) to fulfill your requests and product or service orders, (f) to provide you with information on products, specials, newsletters, and other services we provide, (g) for marketing research, (h) to enforce the terms and conditions of this Privacy Policy, (i) if you are a Consultant with the Company, to enforce the terms of your Consultant Agreement and the Policies and Procedures and in connection with our business relationship as set forth in such documents and (j) as otherwise permitted by law.

Personally identifiable information that is collected from Consultants, customers and Registered Customers through Customer Registration, product or services purchases and/or surveys is used as described above. PHE DOES NOT share personally identifiable information except as set forth in this Privacy Policy.

### **Non-Personally Identifiable or Aggregate Information**

We aggregate the non-personally identifiable information with information collected from other visitors of the websites ("users"), including Consultants, customers, and Registered Customers, to track overall visitor traffic patterns. This aggregated information allows us to develop statistics that are helpful to understand our users. We use this aggregated information to monitor, maintain, and improve the functionality and content of the websites, making it more responsive to the needs of our users. We may also use the non-personally identifiable information for the enhancement, operation, management or maintenance of the websites, in connection with developing and operating new websites and for historical, statistical, scientific, or other

purposes. We reserve the right to use, sell, and assign for any and all purposes all non-personally identifiable information; and you authorize us to use, sell and assign, for any and all purposes, all non-personally identifiable information. PHE may share aggregated information from time to time with its partners, vendors or other third parties. When such aggregate information is shared by PHE, no personally identifiable information is shared.

### **Profile Information**

PHE stores information that it collects through cookies, log files, clear gifs, and/or third parties to create a profile of users. A profile is stored information that PHE keeps on individual users that details their viewing preferences. Profile information is tied to the user's personally identifiable information to provide offers and improve the content of the site for the user. Except as expressly stated herein, PHE may share profile information with third parties in aggregate form only.

### **Cookies**

A cookie is a piece of data stored on a user's computer tied to information about the user. Use of a cookie may be linked to any personally identifiable information while on the websites. PHE collects personally identifiable information from you only when you voluntarily provide it to us. PHE uses both session ID cookies and persistent cookies. For the session ID cookie, once users close the browser, the cookie simply terminates. A persistent cookie is a small text file stored on the user's hard drive for an extended period of time. Persistent cookies can be removed by following Internet browser help file directions.

By setting a cookie on a user's computer, users do not have to log in a password more than once, thereby saving time while at the websites. If a user rejects the cookie, the user will still be able to use the site. The only drawback to this is that the user may need to enter his or her password every time he or she accesses the site.

### **Log Files**

Like most standard website servers PHE's websites use log files. These include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, track user's movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personally identifiable information. We may at a future time use a tracking utility that uses log files to analyze user movement.

## **Clear Gifs (Web Beacons/Web Bugs)**

PHE employs a software technology called clear gifs (a.k.a. Web Beacons/Web Bugs), that help PHE to better manage content on the websites by informing it about what content is effective. Clear gifs are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of users. The main difference between the two is that clear gifs are invisible on the page and are much smaller, about the size of the period at the end of this sentence. Clear gifs are not tied to users' personally identifiable information.

In addition, PHE uses clear gifs in its HTML-based emails to let it know which emails have been opened by the recipients. This allows PHE to gauge the effectiveness of certain communications and the effectiveness of our marketing campaigns.

## **COMMUNICATIONS FROM US**

### **Special Offers and Updates**

PHE sends all new customers and Registered Customers a welcoming email to verify password, username, and acceptance Customer Agreement. Customers and Registered Customers may occasionally receive information on products, services, special deals, and a newsletter. Customers who have not registered with PHE and who grant permission will also receive occasional information on products, services, special deals, and the like.

### **Service Announcements**

On rare occasions it is necessary to send out a strictly service related announcement. For instance, if our service is temporarily suspended for maintenance we might send customers an email.

### **Customer Service**

PHE communicates with customers with respect to products or services purchased by such customers from PHE. Such communications may be by email, regular mail or telephone.

## **SHARING**

### **Legal Disclaimer**

Though PHE makes every effort to preserve user privacy, PHE may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served on PHE. We also may disclose such information in response to a law enforcement agency's request or where we believe it is necessary to investigate, prevent or take action regarding suspected illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Privacy Policy or as otherwise required by law.

### **Non-Personally Identifiable or Aggregate Information**

PHE shares non-personally identifiable/aggregated information with our partners, vendors, service providers and advertisers. This is not linked to any personally identifiable information.

Except as expressly stated herein, PHE DOES NOT Share Personally Identifiable Information about users with any third parties other than as necessary to process orders and applications.

### **Third Party Fulfillment**

PHE uses a credit card processing company to bill customers for goods and services. This company retains credit card information and personally identifiable information so they can fulfill future orders, but does not retain, share, store or use personally identifiable information for any secondary purposes.

### **Service Providers**

PHE partners with other third parties to provide specific services. When necessary to provide services or products to Registered Customers and other customers, we share names and/or other contact information with service providers and vendors. Such third parties are not allowed to use personally identifiable information except for the purpose of providing these services.

### **Business Transitions**

In the event PHE goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, the personally identifiable information of Consultants, Registered Customers and customers will, in most instances, be part of the assets transferred. If, as a result of the business transition, a Consultant, Registered Customer or customer's personally identifiable information will be used in a manner different from that stated at the time of collection, the Consultant,

Registered Customers or customer will be given a choice consistent with our notification of changes section.

## **Choice**

Users are always notified when their information is being collected by any outside parties. We do this so users can make an informed choice as to whether or not they should proceed with services that require an outside party.

## **Links**

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

## **Security**

PHE takes every precaution to protect all users' information. When users submit sensitive information via PHE's websites, their information is protected both online and off-line.

When Customer Registration and/or online order forms ask users to enter sensitive information (such as credit card number), that information is encrypted and is protected with the best encryption software in the industry - SSL. While on a secure page, such as an online order form, the lock icon on the bottom of web browsers such as Mozilla Firefox and Microsoft Internet Explorer becomes locked, as opposed to unlocked, or open, when users are just 'surfing'.

While PHE uses SSL encryption to protect sensitive information online, PHE also does everything in our power to protect user information off-line. All user information, not just the sensitive information mentioned above, is restricted in PHE's offices. Only employees who need the information to perform a specific job are granted access to personally identifiable information. ALL employees are kept up-to-date on Company security and privacy practices. Finally, the servers that store personally identifiable information are in a secure environment.

However, we cannot guarantee that any electronic commerce is totally secure. For example, we have no control over the information collected by your Internet service provider or your employer (if the websites are made available to you through your

employer or if you send us personally identifiable information through your employer-provided email account), or information that you disclose in a public forum. Any such third party that collects your personally identifiable information may use the information in accordance with its terms and conditions of use (and related privacy policies), which may be different from this Privacy Policy. We are not responsible for any information collected by such third parties and/or how such information is used or maintained. Neither we nor any third party have the authority to make any representations or commitments on behalf of the other.

Consultants must comply with all applicable privacy and data security laws, including security breach notification laws when operating their business. Consultants must take appropriate steps to safeguard and protect all private information of customers, including, without limitation, credit card and social security numbers, provided by a retail customer, prospective retail customer or other Consultants. Consultants must hold such information in strict confidence. Consultants are responsible for the secure handling and storage of all documents that may contain such private information. Consultants must adopt, implement, and maintain appropriate administrative, technical, and physical safeguards to protect against anticipated threats or hazards to the security of confidential information and customer data.

## **MISCELLANEOUS**

### **Changes to this Privacy Policy**

PHE 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 on PHE web pages.

### **Making Changes to Your Personally Identifiable Information**

You may update your personal information as necessary by logging into your PHE personal profile.

### **Protecting Children**

PHE is committed to the safety of our children. Persons under the age of 18 may not enroll as PHE Consultants or register as customers. Children under the age of 13 may not purchase products through any of our websites. We do not knowingly collect any personal information from such children at this site or any of its other sites.

**Questions**

Questions regarding this Privacy Policy should be directed to [CustomerService@purehavenessentials.com](mailto:CustomerService@purehavenessentials.com) or by mail to Pure Haven Essentials, at 99 Main Street, Warren, RI 02885

**Effective Date**

The effective date of this Privacy Policy is February, 2016.