

## California Personal Privacy Notice

Last Modified: 11 January 2020

This notice and policy supplements information contained in privacy notices from Vitamin Well USA LLC and its affiliates, including Barebells Functional Foods (“Barebells”) and applies solely to residents of the State of California (“consumers” or “you”). Barebells adopts this notice and policy to comply with the California Consumer Privacy Act of 2018, as amended from time to time (“CCPA”). Any terms defined in the CCPA 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 applies.

### 1. RIGHT TO KNOW ABOUT PERSONAL INFORMATION COLLECTED, DISCLOSED

You have the right to request that we disclose what personal information we collect, use, or disclose about you specifically (“right to know”). To submit a request to exercise the right to know, please submit an email request to [dpo@vitaminwell.com](mailto:dpo@vitaminwell.com) and include “California Request to Know” in the subject line or call our toll-free number at (888) 910-0273. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access.

Barebells will ask that you provide certain information to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Barebells will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

When a business sells your personal information, you have a right to opt out of such sale. Barebells does not sell, and in the preceding 12 months did not sell, California residents’ personal information. Barebells does not have actual knowledge that it sells the personal information of minors under 16 years of age.

### 2. PERSONAL INFORMATION HANDLING PRACTICES

We have set out below categories of personal information we collect about California residents and have collected in the preceding 12 months. 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(o)(1) that most closely describe such personal information.

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

<b>I. Professional or employment-related information.</b>	First and last name, date of birth, job qualifications, employment history, 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

Barebells collects such information from the following categories of sources:

- **Directly from you.** For example, when you contact or request information from us including via the Barebells Site, make an online purchase, or create a Barebells account.
- **Third Parties, including Service Providers.** For example, service providers that Barebells uses, and other third parties that Barebells’ chooses to collaborate or work with.

Barebells 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;
- Review and train on call center recordings;
- Handle and record consumer rights requests, including opt-ins and opt-outs;
- Monitor, protect and improve Barebells security assets and resources, including devices, systems, customer data, infrastructure, and Barebells’ network; and
- Comply with laws, regulatory requirements and to respond to lawful requests, court orders and legal processes.

### 3. SHARING OF PERSONAL INFORMATION

In the preceding 12 months, Barebells disclosed the above categories of personal information to the following categories of third parties for a business purpose, in some cases as directed by you:

- **Barebells Affiliates.** For example, Barebells affiliates may share business processes and common data systems.
- **Third parties and service providers that provide products or services to us.** For example, companies that help us market or advertise to you, or that provide products or services to you. Barebells may use third parties or service providers to help with auditing interactions and transactions with you,

addressing security, fixing errors, helping us with advertising or marketing, maintaining accounts and providing customer service, helping with our internal research, and verifying service quality or safety.

- **Social media platforms and networks.** For example, companies that offer functionalities, plugins, widgets, or tools in connection with our Site or mobile application. For more information about what information is shared or collected, and how it is used, see the applicable social media company's privacy policy.

Barebells 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 Barebells' 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 Barebells' products or services, or member of the public.

#### **4. 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. To submit a request to delete personal information, please submit an email request to [dpo@vitaminwell.com](mailto:dpo@vitaminwell.com) and include "California Request to Delete" in the subject line or call our toll-free number (888) 910-0273. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA.

Barebells is required verify your identity. The information that Barebells 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, Barebells will respond to your request in accordance with the CCPA. Barebells will provide an explanation for denying a request.

#### **5. RIGHT TO NON-DISCRIMINATION FOR THE EXERCISE OF CCPA RIGHTS**

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of California Civil Code § 1798.125.

#### **6. AUTHORIZED AGENT**

You can designate an authorized agent to make a request under the CCPA 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 described in subsections 1 and 6 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 Barebells requests in our response to your email to verify your identity. The information that Barebells 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.

## **7. CONTACT FOR MORE 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 USA LLC located at 1633 Electric Ave, Unit A, Venice, CA 90201  
United States.

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