

# **PRIVACY STATEMENT**

At Bella Grace USA, Inc., (referred to as "we" or "us" or "our"), we are committed to protecting your personal information and privacy. This Privacy Policy applies to the information that we collect about you from online, offline and third party sources, including but not limited to, our official corporate website (bellagraceglobal.com), official mobile application, authorized Independent Consultant (known as Ambassador or Influencer), and any personal information you provide to a Bella Grace representative or Independent Consultant that is shared with us (we collectively refer to these sources as the "Website").

Our Privacy Policy explains how we collect, use and share data and the steps we take to secure the data we collect.

Please review this Privacy Policy carefully to understand how we treat the information you provide through the Website. By accessing or using this Website, you represent that you are at least 18 years old and hereby indicate your unconditional acceptance to this Privacy Policy. This policy may change from time to time (see Changes to Our Privacy Policy). If you do not agree with its terms, please do not access or use the Website or provide information to a Bella Grace Independent Consultant. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

#### THE INFORMATION WE COLLECT

Without limitation, any of the following information may be collected, used and/or shared: information which you may be personally identified such as name; date of birth; age; addresses; email address; gender; telephone number; job title; profession; education level; income; payment information (including credit or debit card number, expiration date and any other associated payment information); as well as other information such as order details; name of your independent consultant; communication preferences; username; password; security questions and answers; and any other information that you provide to us. If you are a consultant we may also ask for your social security number, your banking information and, if applicable, your tax identification number. Some of the above information we collect may be considered Personal Identifiable Information and other information may not. If you do not provide a piece of the information we request, we may not be able to complete your transaction and may try to contact you.

We collect this information: (a) directly from you when you provide it to us, (b) automatically as you navigate through the site, and (c) From third parties, for example, our consultants. Information collected automatically may include but is not limited to, usage details, IP addresses, and information collected through cookies, web beacons, and other data collection technologies.

#### HOW WE USE YOUR INFORMATION

We may use or share the information we collect or you provide to help us create, develop, operate, deliver and improve our products, services, content and marketing. From time to time, we may use the information to send notices, such as communications about purchases, promotional material changes to our terms, conditions and policies. We may also use the information for purposes such as auditing, data analysis, and research to improve our products, services and customer communications. Additionally, we may use the information you provide to create and verify your account profile; fulfill your order; process or fulfill the terms of a consultant agreement or your work as a consultant; provide you with information and customer service in response to your specific request or respond to any of your other inquiries; provide you with information on the Company's, third-party's, or consultant's goods or services (either on a personalized or aggregate basis); improve the content and navigation on the Website; support and better understand consultant and consumer preferences and perform data analytics; provide offers or information relating to the Company, your business and business opportunity; enforce our Terms of Use; resolve disputes; prevent and detect fraud; and otherwise help us to comply with the law, regulation and/or legal process. Moreover, if you enter into a sweepstake, contest or similar promotion we may use the information you provide to administer those programs.

Please note that we may release the information as is reasonably necessary to comply with the law or protect our rights or the rights of others'.

#### HOW WE SHARE PERSONAL INFORMATION

At times, we may use or share certain information with third parties including, but not limited to, (a) our affiliates, (b) contractors, service providers and other third parties including, without limitation, a Bella Grace Independent Consultant, (c) data analytics services, (d) to fulfill orders or deliver products and/or services to you or your gift recipient; (e) product ratings and reviews; (f) to conduct research and satisfaction type surveys, (g) fulfill the purpose you provided it, and (h) others for any other purpose disclosed by us when you provide the information or with your consent.

#### THIRD PARTIES

At times, we may use or share certain information and data for any purpose with third parties including, but not limited to, (a) our affiliates; (b) contractors, service providers and other third parties including, without limitation, a Bella Grace Independent Consultant; (c) data analytics services; (d) to fulfill orders or deliver products and/or services to you; (e) product ratings and reviews; (f) to conduct research and satisfaction type surveys; (g) fulfill the purpose you provided it; and (h) others for any other purpose disclosed by us when you provide the information or with your consent.

# AUTOMATICALLY COLLECTED INFORMATION

We also automatically collect the following non-personal information: the name of the domain and host from which you access the internet; the internet protocol (IP) address of the computer you are using; the browser software you use and your operating system; the date and time you access our site; and the internet address of the website from which you linked directly to our website. We use this information to monitor usage of our website. We also may collect certain information through cookies and similar tools as further described in the section below titled "Cookies, Web Beacons and Other Technologies by Advertisers."

#### CONSENT

By accessing the Website and/or providing your information, you acknowledge and agree that your information will be collected and used pursuant to the guidelines of this policy. You acknowledge that we may combine the information we collect from you with information we collect from other sources, both offline and online.

Any communications that you submit or post to an interactive feature such as a blog or message board may be viewable by other users of the Website. While we may remove the information about you, we assume no obligation to do so. We are not responsible for, nor can we guarantee protection of, any information you submit or post to the interactive features of the Website. Therefore, you acknowledge and understand you have no expectation of privacy in the content you submit to the Website's, whether or not it contains your private information.

When you create an account or log into our Website through a social media service or similar tool, such as through Facebook® or Twitter®, any information that these third party social media sites collect as a result of your use of those sign-in tools is subject to those respective entities' own privacy policies. If you sign-in to our Website using such third party sign-in tools, certain information from those third party websites or services will be shared with us. We will treat this information shared with us in accordance with this Privacy Policy.

#### **CHILDREN UNDER THE AGE OF 13**

This Website is a general audience website and we do not knowingly collect information from children under 13 years of age. If you are under 13, do not use or provide any information on the Website. If we learn that we have information of a child under the age of 13 without verification of parental consent, we will delete that information.

# SECURITY

Whether you place an order, create a profile or enter into a consultant agreement, we recognize the importance of maintaining the security of our customers' personal information. We use reasonable security measures, including physical, administrative, and technical safeguards to protect your personal information. In addition, we use commercially reasonable measures to protect the customer data against unauthorized access. Unfortunately, however, no data transmission over the internet or stored on computer systems can be guaranteed to be 100% secure. As a result, while we strive to protect your information we do not guarantee or warrant the security of any information you transmit to or from our website, and you do so at your own risk. We are not responsible for the actions of unaffiliated third parties.

# COOKIES, WEB BEACONS AND OTHER TECHNOLOGIES BY ADVERTISERS

As is true of most digital platforms, we and our third-party providers also collect information about your device, browsing actions and website usage patterns automatically when you visit or interact with our website, including log data (such as your internet protocol (IP) address, operating system, browser type, browser id, the URL you entered and the referring page/ campaign, date/time of your visit, the time you spent on our services and any errors that may occur during your visit to our services), analytics data (such as the electronic path you take to our website, through our website and when exiting our website, as well as your usage and activity on our website) and location data (such as your general geographic location based on the log data we or our third-party providers collect).

We and our third-party providers may use (i) cookies or small data files that are stored on your computer and (ii) other, similar technologies, such as web beacons, pixels, embedded scripts, location-identifying technologies and logging technologies (collectively, "cookies") to automatically collect this personal information. For example, our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"), to collect and view reports about the traffic on our online services. You can obtain more information on the use of Google Analytics by visiting Google's privacy policy **here** and you can view Google's currently available opt-out options **here**.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using our website, as some features and offerings may not work properly or at all. Depending on your device and operating system, you may not be able to delete or block all cookies. In addition, if you want to reject cookies across all your browsers and devices, you will need to do so on each browser on each device you actively use. You may also set your email options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email and performed certain functions with it.

#### MOBILE LOCATION DATA

For a better user experience in the Level app, you may choose to share location data from your mobile device. If you grant this permission, the Level app uses standard location services built into iOS and Android. This data may be processed to enable you to receive notifications when you arrive/leave home.

#### LINKING

Links to third party websites may be provided on this Website. We have not reviewed all linked third-party sites. We do not control and are not responsible for any of these websites and their content. We do not endorse or make any representations about such sites or any information or materials found there or any results that may be obtained from using them. Since we do not control these websites, we assume no responsibility for the privacy practices of such websites. We encourage you to review the privacy policies and terms of use posted on those, and all, third party websites.

### **EMPLOYMENT OPPORTUNITIES**

We may post employment opportunities on the Website and/or invite users to submit resumes to it. If you choose to submit your name, contact information, resume and/or other personal information to us, you are authorizing us to use this information for all lawful and legitimate hiring and employment purposes. We also reserve the right, at our sole discretion, to forward the information you submit to any parents, subsidiaries and affiliates for legitimate business purposes. Nothing in this Privacy Policy, our Terms of Use or contained in the Website shall constitute a promise by us to interview, hire or employ any individual who submits information to us, nor shall anything in this Privacy Policy, the Terms of Use or contained in the Website constitute a promise that we will review any or all of the information submitted to us by users. We may combine employment application data with research tools and information from other sources.

We comply with the requirements of all applicable laws concerning equal employment opportunity. In the recruitment of employment there will be no unlawful discrimination on the basis of race, color, religion, sex (unless sex is a bona fide occupational requirement), age, national origin, disability, or any other basis prohibited by applicable law. We encourage all qualified applicants to apply.

# SPECIAL NOTIFICATION FOR CALIFORNIA RESIDENTS REGARDING CALIFORNIA PRIVACY RIGHTS

If you are a California resident, you may be able to exercise additional rights granted by California law in relation to the Personal Information about you that we have collected (subject to certain limitations).

#### SPECIAL NOTIFICATION FOR NEVADA RESIDENTS

If you are a Nevada resident, Chapter 603A of the Nevada Revised Statutes permits a Nevada resident to opt out of future sales of certain covered information that a website operator has collected or will collect about the resident. To submit such a request, please contact us at contact@bellagraceglobal.com, or by mail, Attn: General Counsel, Bella Grace USA, Inc. PO Box 950681 Lake Mary FL, 32795.

#### NON-UNITED STATES USERS

You acknowledge that we are principally located in the United States and, accordingly, your information may be transferred to, processed, analyzed, and stored in the United States. If you are located outside of the United States, the information you provide to us will be transferred to the United States whose laws may not provide the same level of protection for your personal information as your home country. In case you wish to verify which personal data is stored on your behalf, have it modified, corrected, or deleted, please contact us at contact@bellagraceglobal.com and explicitly describe your request. You may also contact us at the aforesaid email address and advise us not to use the information you shared with us. By using our web-site you consent to the adjudication of any disputes in the federal courts of, and in accordance with the laws of, the State of Florida.

#### TRANSFER IN THE EVENT OF SALE OR CHANGE OF CONTROL

If the ownership of all or substantially all of Bella Grace's changes or we otherwise transfer assets relating to our business or from Bella Grace to a third party, such as by merger, acquisition, bankruptcy proceeding or otherwise, we may transfer or sell your personal information to the new owner. In such case, unless permitted otherwise by applicable law, your information would remain subject to the promises made in the applicable Privacy Policy unless you agree differently.

#### NOTICES AND PROCEDURES FOR MAKING CLAIMS OF COPYRIGHT INFRINGEMENT

We take claims of copyright infringement seriously. We will respond to notices of alleged copyright infringement that comply with applicable law. Pursuant to Title 17, United States Code, Section 512(c)(2) (the "DMCA"), notifications of claimed copyright infringement should be sent to the Service Provider's Designated Agent. Please send such notices to contactsbellagraceglobal.com or mail said notifications addressed to, Attn: General Counsel, Bella Grace USA, Inc. PO Box 950681 Lake Mary FL, 32795. Notices must comply with the Act and include substantially the following: (a) Your physical or electronic signature, (b) Identification of the copyrighted work you believe to have been infringed or, if the claim involves multiple works on the Website, a representative list of such works, (c) Identification of the material you believe to be infringing in a sufficiently precise manner to allow us to locate that material, (d) Adequate information by which we can contact you (including your name, postal address, telephone number, and, if available, email address), (e) A statement that you have a good faith belief that use of the copyrighted material is not authorized by the copyright owner, its agent, or the law, (f) A statement that the information in the written notice is accurate, and (g) A statement, under penalty of perjury, that you are authorized to act on behalf of the copyright owner. If you

fail to comply with all of the requirements of Section 512(c)(3) of the DMCA, your notice may not be effective.

# CHANGES TO PRIVACY POLICY AND QUESTIONS

This Policy may be amended, from time to time. If we decide to change our Privacy Policy, we will post the revised policy here and update the "Revised" date at the top of the page. If we make material changes to how we treat your personal information, we will send notice by email to the email address specified in your account and/or post a notice on the website home page. You are responsible for ensuring we have an up to date active and deliverable email address for you and you are responsible to periodically review this Policy to check for any changes.

If you would like to access or modify the information that you provided to us or if you have questions about this Policy, please contact us at contact@bellagraceglobal.com, or by mail addressed to Bella Grace USA, Inc. PO Box 950681 Lake Mary FL, 32795. Kindly provide us with the means in which you would like us to use to respond to your inquiry.