

# Privacy Policy

**Our Commitment to Privacy.** We care about your privacy. This Privacy Policy applies to information gathered from and in connection with operation of the VIOCARE.COM website, which is operated by Viocare, Inc. (the "Company", "we," or "us").

This Privacy Policy describes our privacy practices in relation to the use of our website and any applications, affiliated sites, services, and programs, including attendance at marketing and promotional events and activities, and will help you better understand our privacy practices and the choices you can make about the way your personal data is collected and used.

Through the Company site, you may from time to time be able to link to other sites maintained by unaffiliated third parties, such as our suppliers or service providers. As more fully described below, each of these sites may be governed by different privacy policy or statement. We suggest you check the privacy link typically located in the footer of each web page to access and review the applicable privacy policy or statement. Since privacy policies or statements may change periodically, we also suggest that you occasionally re-visit them.

**Please read this Privacy Policy carefully.**

**The Information We Collect.** The information we collect from visitors to the Company site helps us improve our site and provide better service to you. We collect, use, disclose, transfer, and store personal data (such as your name, mailing address, email address, phone, and fax numbers) when needed to provide our services and for our operational and business purposes as described in this Privacy Policy. Occasionally you may also choose to provide us with what may be considered sensitive personal data (collectively, "personal data"). We want to be clear about our privacy practices so that you can make informed choices about the use of your information.

The information we collect falls into two broad categories: (1) information you voluntarily provide to us and (2) information that is automatically collected.

**Information you voluntarily provide to us.** Generally, you can visit the Company site without providing any personal or sensitive personal data. However, on some pages, we collect personal data in order to provide a service or carry out a transaction requested by you. See below for what personal data is collected and how it is used. We may also ask for feedback relating to our goods or services. Participation is voluntary and you are not required to provide this information. There generally is no negative effect on you if you choose not to provide your personal data. However, since personal data may be needed to process an order, if you choose not to participate, we may not be able to perform a requested service or complete a transaction.

**Information Collected Automatically.** Our servers, logs and other technologies collect and store certain personal and non-personal data such as your IP address, machine operating system, geolocations, type of system, and selection preferences that is generated automatically as you navigate through our sites. By using our website, you agree to the processing of the data collected about you for the stated purposes below. We use a standard feature found in browser software called a "cookie" used to store and manage user preferences, deliver targeted advertising, enable content, and gather analytic and usage data, for example. The use of cookies and other tracking technologies is standard across websites and apps through which information is collected about your online activities across applications, website, or other services. You can choose to accept or decline cookies and, while most web browsers automatically accept cookies, you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our sites.

- **What is a cookie?** A cookie is a small text file that is placed on a computer or other device and is used to identify the user or device and to collect information. Cookies help to track user trends and patterns and also relieve users from having to re-enter their preferences on certain areas of the site

where they have previously entered preference information. The cookie types we use to collect personal data and non-personal data include the following attributes: session cookies, persistent cookies, third-party cookies.

- **What is a “Share” button?** Our website may also contain “Share” buttons. Any user who wishes to share content in this manner must have already provided login credentials to the “Share” site. We do not collect any user login information for third-party “Share” sites including those listed below. We have no influence regarding the scope of the data which is collected with the aid of the “Share” buttons, and therefore can only provide you with information for the third-party sites that have been, may be, or are integrated into our website as follows:
  - **Facebook.com**, operated by Facebook Inc., 1601 S. California Ave, Palo Alto CA 94304, USA (“Facebook”) Your rights can be viewed at [www.facebook.com/policy.php](http://www.facebook.com/policy.php).
  - **X (fka Twitter)**, operated by Twitter, Inc., Market Square, 1355 Market St. Suite 900, San Francisco 94103, USA. Your rights can be viewed at <https://twitter.com/en/privacy>.
  - **LinkedIn**, LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Your rights can be viewed at [www.linkedin.com/legal/privacy-policy](http://www.linkedin.com/legal/privacy-policy).

**How We Use Your Information.** We will obtain your consent to collect, use or disclose personal data except where we are authorized or required by law to do so without consent.

In general, consent may be express or implied. We process personal data for these service- and business-related purposes:

- **Account creation:** We may use personal data such as your name, email address, mailing address, and phone number to set up and administer your account and to provide customer support and training, send important account and service information, and to allow us to communicate with you.
- **Marketing purposes:** We may use personal data such as your name, email address, mailing address, and phone number to send marketing communications and to respond to inquiries about The Company, its products, services, and promotional activities to you across various platforms, such as email, phone, text messaging, direct mail and online. We may also collect information about the quality and success of our email marketing (e.g., by analyzing the opening or click rates of our emails).
- **Surveys and polls:** If you choose to participate in a survey or poll, any personal data, such as name, email address, mailing address, and phone number you provide may be used for marketing or market research purposes.
- **Career and applicant purposes:** We use personal data such as name, email address, mailing address, and phone number to communicate during the recruitment process regarding potential careers at The Company.
- **Legal obligations:** We may be required to use and retain personal data for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; or to combat fraud. We may also use personal data to meet our internal and external audit requirements, information security purposes, and as we otherwise believe to be necessary or appropriate: (a) under applicable law, which may include laws outside your country of residence; (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence; (c) to enforce terms and conditions; and (d) to protect our rights, privacy, safety, or property, or those of other persons.

**When We Share Personal Data.** The Company will not provide personal data to any third party or use the information for an undisclosed purpose except as otherwise noted at the point where the information is collected and where necessary to provide services or conduct our business operations as described below. We

share personal data in accordance with data privacy and security requirements, and we occasionally will share non-personal, anonymized, and statistical data with third parties. We make appropriate efforts to ensure that the entities we share personal data with do not further distribute the information such as entering into non-disclosure agreements.

- **Within the Company:** The Company is comprised of a U.S.-based operation. We are supported by a variety of teams and functions. Personal data may be shared with the Company, our agents and contractors, and our suppliers and service providers if needed to provide services or fulfill service orders, for account administration, to facilitate sales and marketing, for customer and technical support, and to promote business and product development.
- **With our business partners.** We partner with suppliers, service providers, and other organizations to deliver services, or to implement marketing activities. The Company will handle personal data in accordance with this Privacy Policy and we encourage you to review the privacy policies of our business partners to learn more about how they collect, use, and share personal data.
- **With third-party service providers.** We have third-party suppliers and service providers. Personal data will be made available to these parties only when necessary to fulfill the services they provide to us such as software, system, and platform support; direct marketing services; cloud or other hosting services; data analytics; and order fulfillment and delivery. Our third-party service providers are not permitted to share or use personal data we make available to them for any purpose other than to fulfill their obligations to the Company.
- **Links to Third-Party Sites.** Our site may contain links to third-party sites that are not under the control of or maintained by the Company. While we try to only link to sites that share our privacy and standards concerns, the Company does not control and we are not responsible for the content, security, privacy policies or the operation of third party sites. Further, if you opt to engage in transactions on third party sites linked to this site, such as purchases or promotions, we are not responsible and you must deal with the third party operators of such sites if any issues arise. As mentioned above, when visiting any site we suggest that you routinely review the applicable privacy policy or statement and other posted terms and conditions to understand your rights and options.
- **In-site search function.** Our in-site search function is provided by Weebly.
- **With third parties for legal reasons.** We will share personal data when we believe we are legally required to, such as:
  - Under applicable law or by legal process such as a court order.
  - To prevent physical harm or property damage, and to protect our rights, users, systems and services.
  - As part of an investigation of suspected or actual unlawful conduct.
  - To comply with and respond to requests from government agencies, including law enforcement and other public authorities, which may include such authorities outside your country of residence.
  - In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Except as otherwise notified in this Privacy Policy, your personal data will not be shared outside of the Company.

**How we store and process personal data.** The Company may from time to time have networks, databases, servers, systems, support, help desks, third-party cloud hosting services, suppliers, service providers and technology support in locations throughout the world. In order to service the needs of the business, workforce, and customers of the Company, personal data may be shared among the Company and these third parties, as well as with its agents and contractors. The Company, as data controller of all personal data collected on this website, takes appropriate steps to ensure that the personal data it collects is processed, secured, and

transferred in accordance with this Privacy Policy and requirements of applicable laws and regulations. In this regard, please note the following:

- All personal data input by you through the use of this site is submitted directly to the Company in the United States. By submitting your personal data through this site, you are hereby consenting to transfer of your personal data to the Company in the United States.
- Your personal data submitted through this site will be shared with the specific office of the Company necessary in order to provide you with services, products and support specific to your location. That office will also provide you with any marketing or sales communications.

**How we secure personal data.** The Company takes the security of personal data it collects and retains seriously. We are committed to safeguarding it and protecting against unauthorized access to, or use of, our information assets and any other anticipated threats or hazards to the security and integrity of such assets. Measures we take to safeguard personal data include appropriate policies and procedures to address risk management, appropriate restrictions on access to personal data; monitoring and physical measures for the secure storage and transfer of personal data; training for employees, agents and contractors with access to personal data; and vendor risk management requiring contractual obligations to protect any personal data with which they are entrusted in accordance with our security policies and procedures.

**How long we keep personal data.** The Company has policies and procedures relating to the retention of personal data based upon a classification scheme consisting of business functions and process areas, and the classification and types of data and records. We retain personal data for as long as we reasonably require it for business and legal purposes. In determining data retention periods, the Company considers contractual and legal obligations, and the expectations and requirements of customers, vendors, suppliers and others who share their personal data with us.

**Opting out:** To opt out of marketing emails, you can use the “Contact Us” option within the relevant service to opt out and elect not to receive further emails from us. Please provide the email address from which you are receiving electronic communications.

**Our Special Commitment to Children’s Privacy.** Protecting the privacy of the very young is especially important. For that reason, we do not knowingly collect personal data from children under the age of 13. This website is not intended for anyone under the age of 16. If you are younger than 16, you may not use this website.

**Do Not Track.** “Do Not Track” is a privacy preference that you can set in most browsers that sends a signal to a website that you do not want the website operator to track certain browsing information about you. However, because our site is not configured to detect Do Not Track signals from a user’s computer, we are unable to respond to Do Not Track requests at this time.

**Changes to the Privacy Policy.** The Company reserves the right to change, amend, or update this Privacy Policy. If we decide to change our Privacy Policy, we will post the revised Privacy Policy on this site. On return visits to our site, please remember to review the Privacy Policy which may have changed, since continued use of our site after any posted revision indicates your consent to our use of your information in accordance with the changed, amended, or updated Privacy Policy.

**How to contact us.** If you have questions or concerns about this Privacy Policy or our privacy practices, you may wish to contact the data controller.

- You may contact us via email at [info@viocare.com](mailto:info@viocare.com).
- For marketing preferences and services support relating to updating your account information or email marketing preferences, or for technical support or other help with services, please use the “Contact Us” option for the relevant service.

**European residents' rights to access, correct, or delete European resident personal data.** This section supplements the information above and applies solely to European residents. This section is to comply with the European General Data Protection Regulation (GDPR) that provides European residents the right to access and control their personal data. We will endeavor to respond to requests for information about personal data and, where applicable will correct, amend, or delete European residents' personal data.

- **Access to personal data:** Requests for European residents' access to personal data should be submitted via the "Contact Us" option within the relevant service used or by sending us an email at [info@viocare.com](mailto:info@viocare.com). We will comply with requests for access to your personal data, subject to any relevant legal requirements and exemptions. We will make commercially reasonable efforts to provide you reasonable access to any of your personal data we maintain within 30 days of your access request. If we cannot honor your request within the 30-day period, we will inform you when we will be able to provide access. In the event that we cannot provide you access to this information, we will explain why we cannot do so. We will ask for proof of your identity in order to confirm your identity and that you are seeking access to personal data belonging to you, and also sufficient information about your interaction with us so that we can locate any relevant data.
- **Correction to and deletion of personal data:** The GDPR also provides European residents with the right to correct or amend personal data if it is inaccurate or requires updating, and also the right to request deletion of your personal data. Due to legal requirements and other obligations and factors, this is not always possible. Remember that account information may be corrected, deleted, or updated by using the "Contact Us" option within the relevant service. For inquiries of this nature, please contact us at [info@viocare.com](mailto:info@viocare.com).
- **Choices:** Some personal data is necessary in order to provide certain services. However, you may choose to limit the Company use of your personal data by adjusting your browser settings, opting out, or you may contact us at [info@viocare.com](mailto:info@viocare.com) for more information regarding your choices. Since personal data may be needed to process an order, if you choose not to participate, we may not be able to perform a requested service or complete a transaction.
- **Filing a Complaint:** EU residents have the right to make a complaint to a data protection regulator in the event of dissatisfaction with how the Company manages their personal data. A list of National Data Protection Authorities can be found here: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm). Please contact us at [info@viocare.com](mailto:info@viocare.com) with any requests related to your personal data.

Thank you for visiting the Company site, which is operated by Viocare, Inc. with the address of P.O. Box 327 Princeton NJ 08542.

*This Privacy Policy is effective as of November 8, 2023*

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