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# Advanced Wellness Solutions Pte. Ltd.

## Privacy Policy

### PRIVACY HIGHLIGHTS

These “privacy highlights” provide an overview of some core components of our data handling practices. Please be sure to read our full privacy statement.

1. We collect information when you register an account, self-report information through surveys, forms, features or applications, use our Services, upload your own content to our Services, use social media connections and features, refer your contacts to us, share information through various interactions with us and our partners, and via cookies and similar tracking technologies (see our Cookie Policy).
2. We use information in general (i) to provide, analyse and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, (iii) to protect the security and safety of our company, employees, customers as we reasonably believe permitted by laws and regulations, (iv) to comply with laws and regulations we are subject to, and (v) if you consent, for marketing and advertising purposes.

### CONSENT TO THE USE OF SENSITIVE INFORMATION

By agreeing to our Privacy Statement and Terms of Service, if you participate in the DNAWELLNESS program, you consent to sensitive information, such as information about your health, Genetic Information, and Self-Reported Information such as social profile and health conditions (where you provide it) being used by us to:

1. Analyse and provide you with our Services;
2. Analyse and provide you with information about your health and wellness;
3. Determine whether you would be suitable to take part in surveys, polls or questionnaires that we are conducting; and
4. Monitor and improve existing products or services that we offer or develop new products and services.

We will not use your sensitive information without your consent unless: (i) the information has been anonymized or aggregated so that you cannot reasonably be identified as an individual; or (ii) a legal obligation requires us to use it in some way e.g. a court order requires us to disclose the information.

### CONSENT TO THE TRANSFER OF YOUR PERSONAL INFORMATION

1. By agreeing to our Privacy Statement and Terms of Service, you consent to the storing and processing of your personal information, including sensitive information, in the USA and outside of the country you live in. We use a range of measures to safeguard information but these countries may have laws that are different from those of your country of residence. You also consent to your personal information, including sensitive information, being transferred in the event of a business transition such as a merger, acquisition by another company, or other transaction or proceeding. In such a case, your information would be used as set out in any pre-existing Privacy Statement.
2. We will not sell, lease, or rent your personal information or individual-level information (i.e., information about a single individual’s genotypes, or other traits/characteristics) to any third party or to a third party without your explicit consent.
3. We give you the ability to share information with other individuals through features in our social community platform.
4. You may independently decide to disclose your information to friends and/or family, doctors, health care professionals, or other individuals outside our Services, including through third party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface (“API”); always review the privacy policies of third-party apps and services before sharing your information.
5. We may share anonymized and aggregate information with third parties; anonymized and aggregate information is any information that has been stripped of your name and contact information and aggregated with information of others or anonymized so that you cannot reasonably be identified as an individual.
6. If you have any questions about our privacy practices, please email our **Regional Customer Care Team\***.

## FULL PRIVACY STATEMENT

This Privacy Statement applies to the MaVie Reward Program, including its Website [www.mavie.net](http://www.mavie.net), owned and operated by Advanced Wellness Solutions Pte. Ltd. ("MaVie" or "Company" or "We" or "Our" or "Us"). Our Privacy Statement is designed to help you (as an applicant or Customer and/or Privilege Customer and/or Independent Representative) better understand how we collect, use, store, process, and transfer your information when operating the MaVie Reward Program, including MaVie Dollars, our Website, mobile apps, products, software and other services (collectively "Service" or "Services").

The following are our core privacy principles:

1. We collect and handle information (i) to provide, analyse and improve our Services, (ii) as we reasonably believe is permitted by laws and regulations, (iii) as reasonably necessary to comply with laws and regulations, (iv) to protect the security and safety of our company, employees, customers and others, and if you consent, (v) to send you communications for marketing and advertising purposes.
2. We will not sell, lease, or rent your personal information or individual-level information (i.e., information about a single individual's genotypes, health conditions or other traits/characteristics) to any third party or to a third party without your explicit consent.
3. We understand and respect the sensitive nature of the information you may provide to us, including information about your genetic characteristics, health conditions and social profile, etc. To that end, we strive to be transparent in our collection, use and disclosure of this information and to ask for your explicit consent to share such sensitive information with third parties. Please see below to learn more about our sharing and consent practices.
4. We are committed to providing a secure and safe environment for our Services.

Please review this Privacy Statement and our General Terms and Conditions for MaVie Freemium Customers, MaVie Privilege Customer Terms and Conditions, Independent Associate Terms and Conditions, Cookie Policy, MaVie VieMax Reward Program Terms and Conditions, Website Terms of Use, MaVie VieDollars Terms and Conditions, Terms of Sale and Delivery of Services, Shipping and Delivery Policy, Cancellation, Refund and Returns Policy and any other terms and conditions as part of the Agreement between you and us, as any or all of them are applicable to you (collectively "Terms of Service"). By using our Services, you agree to all of the policies and procedures described in the foregoing documents. "MaVie" or "we", "us" or "our" means Advanced Wellness Solutions Pte. Ltd. whose principal place of business is Level 6 Republic Plaza, 9 Raffles Place, Singapore 048619.

### 1. What Information We Collect (Collectively Your "Personal Information")

- a. Information you provide directly to us:
  - i. Registration Information.  
When you register for Membership, Privilege Membership or Independent Representation (collectively an "account") with us or purchase/redeem our Services, we collect personal information, such as your name, shipping address and contact information such as your email and phone number.
  - ii. Self-Reported Information.  
If you decide to use the DNAWELLNESS program, you have the option to provide us with additional information ("sensitive information") about yourself through surveys, forms, features or applications. For example, you may provide us with information about your personal traits, health conditions, other health-related information, and background information. We do not collect these information for any Services other than the DNAWELLNESS program.
  - iii. User Content.  
Some of our Services allow you to create and post or upload content, such as data, text, software, music, audio, photographs, graphics, video, messages, or other materials that you create or provide to us through either a public or private transmission ("User Content"). For example, User Content includes any post or message you place on Advanced Wellness Solutions Pte. Ltd.'s community forums.
  - iv. Blogs.  
Our Website offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request that we remove or anonymize your personal information from our blog or community forum, contact us at **Regional Customer Care Team\***. Please note that whenever you post something publicly, it may sometimes be impossible to remove the information, for example, if someone has taken a screenshot of your posting. Please exercise

caution before choosing to share personal information publicly on our blogs, community forums or in any other posting.

v. Social Media Features and Widgets.

Our Website includes Social Media Features. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. They may also allow third party social media services to provide us information about you, including your name, email address, and other contact information. The data we receive is dependent upon your privacy settings with the social network. Features are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it and are not controlled by us. You should always review the respective privacy policy before using any third-party websites/services and providing your personal information to them. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to our website or Service.

vi. Testimonials.

We may post customer testimonials either on our website or in other online or offline formats. Customer testimonials may contain personal information and it is our policy to request consent from customers in advance of using testimonials. If you wish to update or delete your testimonial, you can contact our **Regional Customer Care Team\***.

vii. Referral Information and Sharing.

When you refer a person to MaVie or choose to share results information with another person, we will ask for that person's email address. We will use the email address solely, as applicable, to make the referral or to share your results information, and we will let your contact know that you requested the communication. By participating in a referral program or by choosing to share information with another person, you confirm that the person has given you consent for MaVie to communicate (e.g. via email) with him or her.

viii. Address books.

If you choose to use your computer's or mobile device's address book in connection with our Services to make referrals or to request that we communicate with another person, we may collect the names and contact information of those persons for these purposes only.

ix. Third-party services (e.g. social media).

If you use a third-party site, such as Facebook or Twitter, in connection with our Services to communicate with another person (e.g., to make or post referrals or to request that we communicate with another person), then in addition to that person's name and contact information, we may also collect other information (e.g. your profile picture, network, gender, username, user ID, age range, language, country, friends lists or followers) depending on your privacy settings on the third-party site. We endeavour to delete any information inadvertently collected but unnecessary for the purposes of providing our Services to you. However, we do not control third-party site's information practices, so please review their privacy policies and your settings on those sites carefully.

x. Gifts.

If you provide us personal information about others, or if others give us your information for purposes of ordering the Service as a gift, we will only use that information for the specific reason for which it was provided to us. Once a gift recipient registers for his or her Services and agrees to our Privacy Statement and our Terms of Service, his or her information will be used consistent with this Privacy Statement and those agreements, and we will not share any of the gift recipient's personal information with the user who purchased the gift.

xi. Customer service.

When you contact our Customer Service team or correspond with us about our Service, we collect information to: track and respond to your inquiry; investigate any breach of our Terms of Service, Privacy Statement or applicable laws or regulations; and analyse and improve our Services.

b. Information related to our genetic testing services of the DNAWELLNESS program (part of the "sensitive information")

i. Inner cheek sample and bio-banking.

To use our genetic testing services, you must purchase, or receive as a gift, a MaVie sample collection kit, register an online account, and ship your inner cheek sample to our third-party laboratory. Once received, your inner cheek sample will be identified by its unique barcode, along with your gender and your date of birth. The barcode label identifies you to us but not to our third-party laboratory. Unless you choose to store your sample with MaVie (called "bio-banking"), your inner cheek samples and DNA are destroyed after the laboratory completes its work, unless the laboratory's legal and regulatory requirements require it to maintain physical samples.

ii. Genetic Information

Genetic Information refers to features of your DNA that distinguish you from other people (e.g. the As, Ts, Cs, and Gs at particular locations in your genome) and is generated when we analyse and process your inner cheek sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the MaVie Results information reported to you as part of our Services, and may be used for other purposes, as outlined in Section 2 below.

c. Information collected through tracking technology (e.g. from cookies and similar technologies)

i. Web Behaviour Information.

We and our third party partners use cookies and similar technologies (such as web beacons, tags, scripts and device identifiers) to help us recognize you, customize and improve your experience, provide security, analyse usage of our Services (such as to analyse your interactions with the results, reports, and other features of the Service), gather demographic information about our user base, and, if you consent, to offer our products and services to you, to monitor the success of marketing programs, and to serve targeted advertising on our site and on other sites around the Internet. We and our third-party partners do not use your sensitive information, such as Genetic Information and Self- Reported Information, for targeted advertising. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited. For more information, including the types of cookies found on MaVie please read our Cookie Policy.

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you, such as your user profile ID or order number. We do this to improve services we offer you, and to improve marketing, analytics, and site functionality.

Because MaVie relies on third party ad networks who may track you across websites over time for advertising purposes, we are not able to respond to your selection of the “Do Not Track” option provided by your browser. We cannot advise on whether your selection of “Do Not Track” option will have any effect on the collection of cookie information by the third parties who collect such cookie information on our site. Please see Section 2.c.ii, below, to learn more about our third party advertising partners, and visit our Cookie Policy to learn more about tracking cookies.

Third parties with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity use Flash Cookies (Local Shared Objects) to collect and store information. To learn how to manage privacy and storage settings for Flash cookies click here:

[http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html#117118](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html#117118)

ii. Other Types of Information.

We are always working to enhance our Services with new products, applications and features that may result in the collection of new and different types of information. We will update our privacy statement and notify you and to obtain fresh consent form you, if necessary.

## 2. How We Use And Share Information

MaVie will use and share your personal information with third parties only in the ways that are described in this privacy policy.

a. Using personal information to provide, analyse and improve our Services

We use the personal information described above in Section 1 to operate, provide, analyse and improve our Services. These activities may include, among other things, using your personal information in a manner consistent with other commitments in this privacy statement, to:

- i. open your account, enable purchases and process payments, communicate with you, and implement your requests (e.g., referrals);

- ii. host our Website, run our mobile application(s), authenticate your visits, provide custom, personalized content and information, and track your usage of our Services;
- iii. conduct analytics to improve and enhance our Services;
- iv. offer new products or services to you, including through emails, promotions or contests;
- v. conduct surveys or polls, and obtain testimonials;
- vi. process and deliver your genetic testing results (if you subscribe to and use the DNAWELLNESS program);
- vii. perform research & development activities, which may include, for example, conducting data analysis and research in order to develop new or improve existing products and services, and performing quality control activities.

You may be able to opt-in, opt-out or otherwise adjust your preferences of having your information used for certain of these activities. Please see below to learn more.

b. Direct marketing

- i. If you consent to direct marketing, we may use your personal information (your name, residential and email addresses, phone number, and data collected by cookie technology described in Clause 2d.ii below), except any sensitive information, to send you online marketing campaigns and targeted advertising, and may transfer data collected by cookie technology described in Clause 2d.ii below to third party advertising networks and providers to send targeted online advertisement to you, in order to market any new products of the MaVie Reward Program, or products and services including wellness and travel. We can also measure the effectiveness of our marketing and targeted advertising;
- ii. We will not send you any marketing communications if you do not consent to direct marketing on the application form or on the Website;

Even if you have consented, you may opt-out from receiving any marketing communications at any time by contacting our **Regional Customer Care Team\***.

c. Information you choose to share with others

MaVie gives you the ability to share information with other individuals who have MaVie accounts through (i) our community forums, (ii) friends finding features, and (iii) other sharing features (such information is "User Content"). Please refer to your settings. You may be required to opt-in to some of this sharing, but some features require an opt-out. For example, if you were participating in our "Search for Friends" Database you may opt-out or change the visibility of your profile data by visiting your Settings. Also, please note that certain types of your User Content may be viewable by other MaVie users and once posted, you may not be able to delete or modify such content.

You may decide to disclose your personal information to friends and/or family Customers, doctors or other health care professionals, and/or other individuals outside of our Services, including through third-party services such as social networks and third-party apps that connect to our website and mobile apps through our application programming interface ("API"). These third parties may use your personal information differently than we do under this Privacy Statement. Please make such choices carefully and review the privacy policies of all other third parties involved in the transaction. For example, if you have enabled a MaVie sharing feature with another person who downloads a third-party app that uses our API, your information may also be obtained by that third-party app developer and, potentially, by other users of that third-party app.

In general, personal information, once shared or disclosed, can be difficult to contain or retrieve. MaVie will have no responsibility or liability for any consequences that may result because you have released or shared personal information with others. It is incumbent upon all users to share personal information and account access only with people they know and trust.

d. Information we share with third parties

- i. General service providers (applicable to DNAWELLNESS program only). We share the information described above in Section 1 with our service providers, as necessary to provide their services to us. Service providers are third parties (other companies or individuals) that help us to provide, analyse and improve our Services. For example, we work with third-party laboratories and contractors to process and analyse your inner cheek sample for purposes of generating your Genetic Information.

NOTE: Our service providers act on MaVie's behalf. While we implement procedures and contractual terms to protect the confidentiality and security of your information, we cannot guarantee the confidentiality and security of your information due to the inherent risks associated with storing and transmitting data electronically. To learn more about our third-party laboratories, see below paragraph.

When you purchase a testing kit from MaVie, you are instructed to send an inner cheek sample to our third-party laboratory with a unique barcode label. The unique barcode identifies you to us but not to the laboratory. No other Registration Information (such as your name, address, email, phone number or other contact information) is required or provided to the laboratory. The receiving personnel at the laboratory will remove and discard your "sender information" from the packaging (e.g., name, address) before testing personnel receive the samples for processing. Receiving personnel do not perform testing, and testing personnel handle inner cheek samples that are labelled only with the unique barcode. Unless you choose to store your sample, DNA and inner cheek samples are destroyed after the laboratory completes its work, provided that laboratory legal and regulatory requirements no longer require the actual samples to be maintained. The laboratory securely sends the resulting Genetic Information to us along with your unique barcode. Genetic Information is stored securely on our servers; the laboratory also stores your Genetic Information, but again, labelled only with the barcode.

- ii. "Targeted advertising" service providers (applicable only if you consented to direct marketing).

We permit third party advertising networks and providers to collect Web Behaviour Information on our Service to help us to deliver targeted online advertisements ("ads") to you. They use cookies and similar technologies (such as JavaScript, beacons, device identifiers, location data, and clear gifs) to compile information about your browser's or device's visits and usage patterns on our Services and on other websites over time, which helps to better personalize ads to match your interests, and to measure the effectiveness of ad campaigns. Note that we do not share Registration Information, Genetic Information or Self- Reported Information with these advertising partners, even if you consented to direct marketing.

For more information about our advertising and marketing practices, please review our [Cookie Policy](#).

- iii. Aggregate information. We may share aggregate information with third parties, which is any information that has been stripped of your Registration Information (e.g., your name and contact information) and aggregated with information of others so that you cannot reasonably be identified as an individual ("Aggregate Information"). This Aggregate Information is different from "individual-level" information. Individual-level Genetic Information or Self-Reported Information consists of data about a single individual's genotypes, health condition or other traits/characteristics information. For example, Aggregate Information may include a statement that "30% of our female users share a particular genetic trait," without providing any data or testing results specific to any individual user. We may provide such Aggregate Information in commercial arrangements with our business partners. In contrast, individual-level Genetic Information could reveal whether a specific user has a particular genetic trait, or all of the Genetic Information about that user. MaVie will ask for your consent to share individual-level Genetic Information or Self-Reported Information with any third party, other than our service providers as necessary for us to provide the Services to you.
- iv. Information we share with commonly owned entities. We may share some or all of your information with other companies under common ownership or control of MaVie, which may include our subsidiaries, our corporate parent, or any other subsidiaries owned by our corporate parent. We may provide additional notice and ask for your consent if we wish to share your information with our commonly owned entities in a materially different way than discussed in this Privacy Statement.

- e. Disclosures required by law

Under certain circumstances your information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders, or in coordination with regulatory authorities. MaVie will preserve and disclose any and all information to law enforcement agencies or others if required to do so by law or in the good faith belief that such preservation or disclosure is reasonably necessary to: (a) comply with legal or regulatory process (such as a judicial proceeding, court order, or government inquiry) or obligations that MaVie may owe pursuant to ethical and other professional rules, laws, and regulations; (b) enforce the MaVie Terms of Service and other policies; (c) respond to claims that any content violates the rights of third parties; or (d) protect the rights, property, or personal safety of MaVie, its employees, its users, its clients, and the public.

### 3. Your Choices

a. Access to your account

If your Registration Information changes, you may access, correct or update most of it from your Account Settings page. You may also modify and delete certain of your information. You may be able to correct or reset Self-Reported Information entered into a survey, form, or feature from your account on the surveys page. If the feature does not enable you to correct or reset information, you may do so by contacting our Customer Service team at support@MaVie.net. Please note that you may not be able to delete User Content that has been shared with others through the Service and that you may not be able to delete information that has been shared with third parties, though we can work with you to prohibit your data from being shared with third parties in the future. We will respond to your request to access within 30 days.

b. Marketing communications

We may not use your personal information for direct marketing or online advertising if we do not have your consent. You may change your consent settings, including to opt-out from receiving any direct marketing or advertising materials, on the Website or email our **Regional Customer Care Team\***. Please refer to Clauses 2.b above under the heading “direct marketing” and 2.d.ii above under the heading “Targeted Advertising Service Providers” for more information.

c. Account closure

If you no longer wish to participate in our Services or no longer wish to have your personal information be used, you may close your account by sending a request to our **Regional Customer Care Team\***. When closing an account, we remove all Genetic Information within your account (or profile) within thirty (30) days of our receipt of your request. Our contracted genotyping laboratory may also retain your Genetic Information as required by local law and we may retain backup copies for a limited period of time pursuant to our data protection policies. In addition, we retain limited Registration Information related to your order history (e.g., name, contact, and transaction data) as long as your account is active or as needed to provide you services, as well as for accounting, audit and compliance purposes.

### 4. Important Information

a. TRUSTe

MaVie has received TRUSTe's Privacy Seal signifying that this privacy statement and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal. The TRUSTe program covers only information that is collected through this Web site, www.MaVie.net and through our mobile application.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe here.

b. Safe Harbor

MaVie complies with the U.S.-EU and U.S.-Swiss Safe Harbor Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union (EU) member countries and Switzerland. MaVie has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view MaVie's certification, please visit: <http://www.export.gov/safeharbor/>.

c. Security measures

MaVie takes seriously the trust you place in us. To prevent unauthorized access or disclosure, to maintain data accuracy, and to ensure the appropriate use of information, MaVie uses a range of physical, technical, and administrative measures to safeguard your Personal Information. In particular, all connections to and from our website and mobile application are encrypted using Secure Socket Layer (SSL) technology.

Please recognize that protecting your Personal Information is also your responsibility. We ask you to be responsible for safeguarding your password, secret questions and answers, and other authentication information you use to access our Services. You should not disclose your authentication information to any third party and should

immediately notify MaVie of any unauthorized use of your password. MaVie cannot secure Personal Information that you release on your own or that you request us to release.

Your information collected through the Service may be stored and processed in Singapore, the United States or any other country in which MaVie or its subsidiaries, affiliates or service providers maintain facilities and, therefore, your information may be subject to the laws of those other jurisdictions which may be different from the laws of your country of residence.

d. Business transactions

In the event that MaVie goes through a business transition such as a merger, acquisition by another company, or sale of all or a portion of its assets, your information will likely be among the assets transferred. In such a case, your information would remain subject to the promises made in any pre-existing Privacy Statement.

e. Linked websites

MaVie provides links to third-party websites operated by organizations not affiliated with MaVie. MaVie does not disclose your information to organizations operating such linked third-party websites. MaVie does not review or endorse, and is not responsible for, the privacy practices of these organizations. We encourage you to read the privacy statements of each and every website that you visit. This Privacy Statement applies solely to information collected by MaVie.

f. Children's privacy

MaVie is committed to protecting the privacy of children as well as adults. Neither MaVie nor any of its Services are designed for, intended to attract, or directed toward children under the age of 18. A parent or guardian, however, may collect an inner cheek sample from, create an account for, and provide information related to, his or her child. The parent or guardian assumes full responsibility for ensuring that the information that he/she provides to MaVie about his or her child is kept secure and that the information submitted is accurate.

g. Changes to this Privacy Statement

Whenever this Privacy Statement is changed in a material way, a notice will be posted as part of this Privacy Statement and on our customers' account login pages for thirty (30) days. After thirty (30) days the changes will become effective. In addition, all customers will receive an email with notification of the changes prior to the change becoming effective.

## 5. Contact Information

If you have questions about this Privacy Statement, please email our **Regional Customer Care Team\***.

Last updated: 8<sup>th</sup> February 2019

\*MaVie Regional Customer Care:

ASIA: [asia@mavie.net](mailto:asia@mavie.net) | AUSTRALIA: [australia@mavie.net](mailto:australia@mavie.net) | SOUTH AFRICA: [africa@mavie.net](mailto:africa@mavie.net) | EUROPE: [europe@mavie.net](mailto:europe@mavie.net)