

INFINITUS HEALTH PRODUCT (PHILIPPINES) INC.

CONFIDENTIALITY AND PRIVACY POLICY

Philippines Version:

This Privacy Policy sets out: (1) the purposes for which **Infinitus Health Product (Philippines) Inc.** (hereafter, “Infinitus Philippines” “us” or “we”) collects, uses and discloses your personal information; (2) the type of personal information that we collect; (3) how we use and disclose that information; (4) how we obtain your consent to the collection, use and disclose that information; (5) how we secure and retain that information; and (6) how you may access your personal information.

(1) Collection of information

Infinitus Philippines will collect, use, and disclose personal information obtained from the following groups of persons, in the following manner, and for the following purposes:

Customer Information

The following section sets out Infinitus Philippines’ policies regarding any personal information collected about those who have purchased products or submitted orders to purchase products from either or both of Infinitus Philippines or Infinitus Philippines Distributors (“Customers”).

Purposes of Collection of Customer Personal Information

Infinitus Philippines will collect, use and disclose Customers’ personal information only for the purposes declared herein and only insofar as it is reasonable under the circumstances, as described in further detail below.

In providing various goods and services to its Customers, Infinitus Philippines collects and uses certain personal information obtained from its Customers, including the name, address, telephone number, e-mail address, username, credit card information, billing and shipping information, and other like information, for the purpose of fulfilling the orders of its Customers, and other related purposes (the “Personal Customer Information” as further defined below).

Collection of Personal Customer Information

To purchase Infinitus Philippines products, Customers may be required to fill out the information required in the Sales Order Form. Customers may also provide similar information by telephone, fax, e-mail, or over the internet (for example through a website or smart phone software application).

Customer Consent

When a Customer fills out and signs/executes a Sales Order Form, the Customer shall give its consent to the collection, use, disclosure, transfer/sharing and retention of his or her Personal Customer Information, for the purposes enumerated herein.

A Customer may withdraw his or her consent at any time, by contacting our Privacy Officer in the manner set out below.

Use of Personal Customer Information

Infinitus Philippines will use the Personal Customer Information disclosed in the Sales Order Form to process and complete the Customer's order, including for shipping and billing purposes, and to verify either the purchase or the delivery of the products.

In addition, a Customer's personal information may be used for the following purposes:

1. **Verification / Confirmation of Orders, Etc.** - The information shall be used for identification and verification and ordering and billing purposes. In addition, the Customers may receive the following communications from Infinitus Philippines: Communications related to transaction and account maintenance activities. These communications include without limitation: surveys, enrollment confirmations, order confirmations; order update notices; order problem notices; and notices regarding material changes to site policies and account management procedures.
2. **Customer Satisfaction** – The information may be used for Customer satisfaction purposes including, but not limited to, monitoring and ensuring Customer satisfaction, trouble shooting problems, responding to inquiries and resolving disputes.
3. **Detection and Prevention of Fraud** – The information may be used in order to detect and protect us against error, fraud, or other criminal activity. The information may be shared with governmental agencies or other companies assisting Infinitus Philippines in fraud prevention or investigation. Infinitus Philippines may do so when: 1) expressly permitted or required by law; 2) trying to protect against or prevent actual or potential fraud or unauthorized activity; or 3) investigating fraud that has already taken place.
4. **Promotion of Products** – The information may be used to provide product information and related services, activities, contests, promotions and projects and providing personalized marketing information.
5. **Statistics** – The information may be used for statistical purposes to collect and analyze statistical information, and to produce aggregate and anonymous reports for internal and external research organizations;

Failure to provide personal information to us may result in Infinitus Philippines' being unable to fulfil an order or request for service, or may delay fulfillment of an order or request for service. Customers unwilling to provide requested information will further be unable to receive exclusive offers and promotional material and/or enter competitions.

Distributor Information

The following section sets out Infinitus Philippines's policies regarding any personal information collected from or about its Distributors.

Purposes of Collection of Distributor Personal Information

Infinitus Philippines will collect, use and disclose personal information of its Distributors only for the purposes declared herein and only insofar as it is reasonable under the circumstances, as described in further detail below.

In the course of operating the business as a Distributor, Infinitus Philippines collects and uses certain personal information obtained from Distributors, including name, contact information, sales information, information on your downline, and other related information, in order to administer his or her position as a Distributor and assist in the fulfillment of Customer orders.

Collection of Distributor Personal Information

To become a Distributor, a person will complete and sign a Member Application Form (“Distributor Agreement”). The information that Infinitus Philippines collects in the Distributor Agreement typically includes the person’s name, personal details (e.g., date of birth, gender), contact information (e.g., address, telephone, email, fax) and financial information (e.g., bank account information).

During the course of a Distributor’s business, Infinitus Philippines will keep track of a Distributor’s sales, and those of his or her downline, for the purposes of determining ranking as a Distributor and payment of commissions and other bonuses and payments.

Distributor Consent

When an individual completes and signs the Distributor Agreement, the Distributor shall give its consent to the collection, use, disclosure, transfer/sharing and retention of their personal information for the purposes which have been set out herein, by signing the consent statement provided in the Distributor Agreement.

A Distributor may withdraw his/her consent at any time, by contacting the Infinitus Philippines Privacy Officer in the manner set out below. Please be reminded that if a Distributor withdraws his or her consent, Infinitus Philippines’ ability to maintain a commercial relationship with him or her may be significantly inhibited.

Use of Distributor Personal Information

If the Distributor Agreement is accepted by Infinitus Philippines, Infinitus Philippines will use the personal information disclosed solely within the context of the commercial relationship of Infinitus Philippines with the Distributor, and for the following purposes:

1. **Processing Application** – The personal information identified above will be used to receive, consider and process the Distributor Agreement.
2. **Processing and Shipping Distributor Orders** – From time to time, orders are submitted by Distributors, and goods are shipped to Distributors. The personal information identified above will be used to facilitate this process.
3. **Business Information Purposes** – As Distributors develop their businesses, the personal information outlined above may be further distributed to their uplines for a variety of purposes, including general information, training, other motivational/recognition purposes, and downline activity.

4. **Customer Sales and Business Opportunity Referrals** – Infinitus Philippines, if receiving unsolicited requests for product, may use the personal information outlined above for purposes of making a referral to your business of a possible Customer.
5. **Administrative Purposes** – From time to time, Infinitus Philippines may use personal information relating to Distributors for administrative purposes and to troubleshoot problems or resolve disputes.
6. **Detection and Prevention of Fraud** – Infinitus Philippines may use personal information regarding Distributors in order to detect and protect Infinitus Philippines against error, fraud, or other criminal activity. Infinitus Philippines may share this information with governmental agencies or other companies assisting in fraud prevention or investigation. Infinitus Philippines may do so when: 1) permitted or required by law; 2) trying to protect against or prevent actual or potential fraud or unauthorized activity; or, 3) investigating fraud that has already taken place.

Where a Distributor Agreement is not accepted by Infinitus Philippines, Infinitus Philippines will destroy the Distributor Agreement and will not keep any of the information provided.

Web Information

Collection of Web Information

Infinitus Philippines automatically receives certain types of information whenever the Customer or Distributor visits the website (the “Site” or “Infinitus Site”) or use the Platform. For example, like many websites, Infinitus Philippines uses “cookies” to obtain certain types of information when the web browser accesses the Site. Infinitus Philippines may log the IP address of the location from where the Customer or Distributor is visiting the Site. Platform and the Site use cookies for the purposes of providing better services. Each time a user uses Platform or the Site, the user will be identified by cookies which allows Infinitus Philippines to provide more personalized services. Infinitus Philippines will provide products and services which better suit Customer needs in accordance with this information. Most browsers automatically accept cookies; however, it is possible to choose not to accept cookies. If cookies are not accepted, access to Platform and/or Site may be limited.

(2) Protection of Personal Information

Infinitus Philippines protects your personal information in compliance with the *Data Privacy Act of 2012*, its implementing rules and regulations, and other regulations relating thereto issued by the National Privacy Commission. The *Data Privacy Act of 2012* extends rights to data subjects, including rights to access, rectification, erasure or blocking, damages, transmissibility and portability.

Except as provided for in this Policy, Infinitus Philippines will never sell, barter, share, or rent Customers’ or Distributors’ Personal Information that it may hold from time to time to any third party without a Customer’s or Distributor’s express written consent.

Infinitus Philippines shares the personal information of Customers and Distributors that it collects as follows:

- a) **Subcontractors.** Infinitus Philippines sends the personal information to third-party subcontractors and agents that work on our behalf to provide certain services (e.g., order processing, settlement of payment, credit reference, recovery of overdue payment and our business operations). These third parties do not have the right to use the personal information beyond what is necessary to assist Infinitus Philippines to fulfill orders or perform other business operations. They are contractually obligated to maintain the confidentiality and security of the personal information and are restricted from using such information in any way not expressly authorized by Infinitus Philippines.
- b) **Service Providers.** Infinitus Philippines sends the personal information to third party providers of goods and services that may be purchased from time to time on Infinitus Philippines' Site (e.g., ISPs). Like subcontractors, these third parties do not have the right to use the personal information beyond what is necessary to assist Infinitus Philippines. They are contractually obligated to maintain the confidentiality and security of the personal information and are restricted from using such information in any way not expressly authorized by Infinitus Philippines. They are not permitted to forward information to a third party.
- c) **Related Entities.** Infinitus Philippines provides personal information to its subsidiaries, affiliated companies and other related companies for the purpose of
- i. Releasing information about our products and services, activities, competitions, promotions and projects;
 - ii. Enabling you to have tailed and pleasant shopping experience when you shop, and providing personalized marketing information, for which we edit web advertisements and contents;
 - iii. Handling your orders for our and our affiliated companies' products and services and settling the payments;
 - iv. Answering your inquiry;
 - v. Offering membership registration, discount and bonus;
 - vi. Collecting and analysing statistical information, and producing anonymous reports for internal and external (inter-regional transmission may be required) research organisations;
 - vii. Conducting research on customers, products or services;
 - viii. Conducting assessment to further improve the quality of products and services;
 - ix. Achieving the purposes in direct relation to the above; and
 - x. Enabling us or our agents to use your name and contact details for direct sales promotion of our membership and/or products.

Related entities do not have the right to use the personal information beyond the purposes declared herein. They are contractually obligated to maintain the confidentiality and security of the personal information and uphold the rights of data subjects. They are also restricted from using such information in any way not expressly authorized by Infinitus Philippines. Customers and Distributors have the right to access and correct the personal information provided to the related entities and to object to the processing thereof.

- d) **Credit Card Companies.** Credit card transactions are handled by a third-party financial institution and their vendors, which receive the credit card number and other personal identifying information only to verify the credit card numbers and process transactions.
- e) **Law Enforcement Investigations.** Infinitus Philippines may release personal information where its legal representatives consider disclosure necessary to comply with a current judicial proceeding, a court order or legal process served on Infinitus Philippines, its associates or subsidiaries, or where disclosure is required by law.

- f) **Internal Investigations:** To investigate and prevent any fraudulent activity that may be unlawful or potentially harmful to the integrity of Infinitus Philippines, but only to the extent reasonably necessary in the circumstances;
- g) **Cross-Border Transfer.** Personal information may be transferred to a subsidiary, or another group of company affiliated with Infinitus Philippines if this is necessary for the implementation of the object of the respective contracts and/or for the execution of your orders or for the provision of a service. They are contractually obligated to maintain the confidentiality and security of the personal information and are restricted from using such information in any way not expressly authorized by Infinitus Philippines. They are not permitted to forward information to a third party.
- h) **Business Transitions:** Where Infinitus Philippines goes through a business transition, such as a merger, being acquired by another company, or selling a portion of its assets, Customers' Personal Information will, in most instances, be part of the assets transferred.

(3) Retention of Personal Information

Infinitus Philippines will retain the Personal Customer Information for as long as it is necessary for the fulfillment of the declared, specified, and legitimate purpose declared herein. However, personal information and other business records which are required to be kept for purposes of complying with applicable tax legislation requiring preservation of books of accounts and accounting records may be retained for a period of up to 10 years from date of collection, and upon the expiry of which all personal information will be destroyed.

All personal information disclosed in the course of a Distributor's business relationship with Infinitus Philippines will be retained by Infinitus Philippines until the later of, (1) termination of the Distributor Agreement by either Infinitus Philippines or the Distributor or, (2) for as long as it is required under tax legislation to keep business records (which may be up to 10 years from date of collection), and upon the expiry of which all personal information will be destroyed.

(4) Accuracy

Infinitus Philippines strives to ensure that all personal information collected and retained is accurate, current and complete as necessary for the purposes for which it is collected, used or disclosed.

As it is important that the information be accurate and up-to-date, Customers and Distributors shall inform Infinitus Philippines of any changes to their personal information, as soon as possible.

(5) Access to Personal Information

Customers and Distributors have the right to inspect and correct personal information in Infinitus Philippines' possession. Requests to inspect and/or correct personal information should be made to Infinitus Philippines via email, CS.Global@infinitus-int.com.

(6) Changes to Privacy Policy

Infinitus Philippines reserves the right to amend this policy from time to time and without notice. Infinitus Philippines will post any amendments to this Privacy Policy on its homepage, and other places Infinitus Philippines deems appropriate. Where amendments mean Infinitus Philippines will use Personal Customer Information in a manner different from that stated at the time of collection, Infinitus Philippines will notify Customers by posting a notice on its Site and/or Platform for 30 days prior to the date the amended policy will come into force. The continued use of the products or websites, or continuing to act as an Infinitus Philippines Distributor following the posting of changes to this Privacy Policy, will signify acceptance of those changes.

(7) Contact

If there are any questions with respect to the policies concerning the handling of the personal information, any complaints about how Infinitus Philippines has collected, handled or used the personal information or

if there is a request access to or correct personal information, please contact Infinitus Philippines' Privacy Officer, Mr. Angus Chan as follows:

- Mr. Angus Chan
- 37/F, Infinitus Plaza, 199 Des Voeux Road Central, Hong Kong
- Telephone number: 852 26603292
- Email: CS.Global@infinitus-int.com

Please note that consent may be withdrawn at any time, by contacting the Privacy Officer as set out above.

(8) Interpretation

In this document:

“Customer”	anyone who has or purchased products or submitted orders to purchase products from either or both of Infinitus Philippines or Infinitus Philippines Distributors.
“Distributor”	anyone who has entered into the Distributor Agreement with Infinitus Philippines.
“Infinitus Philippines”	means Infinitus Philippines, its parent company, subsidiaries and its Authorized Associates.
“Personal Customer Information”	includes but is not limited to a Customer’s User Profile, name and contact details, user name, email address, Customer ID, driver’s license number, credit card and account details;
“Platform”	means Infinitus Philippines’ mobile software tool;
“User Profile”	means stored information, whether electronic or otherwise, Infinitus Philippines retains about individual Customers and which details their viewing preferences.

This Terms and Conditions has been translated into Chinese. Should there be any inconsistency or ambiguity between the English version and the Chinese version, the English version shall prevail.