

iGALEN PRIVACY POLICY

Privacy Policy Effective April 19th, 2019

This Privacy Policy (the “Privacy Policy”) describes how iGalen, Inc., and its parents, subsidiaries, representatives, affiliates, officers and directors (collectively, the “Company” or “we” “our” or “us”) collects, uses, process, and discloses your personal information, in conjunction with your access to and use of www.igalen.com (the “Site”) and each website owned or maintained by the Company (collectively, together with the Site, the “Sites”) and the Payment Services. This privacy policy describes the Company’s privacy practices for all Sites, platforms and services that link to it.

By using any of the Sites, you signify that you have read, understand and agree to be bound by this Privacy Policy. This policy applies to all online communication with on the Sites. When you provide us with online information through any of the Sites, we respect your privacy. It is important for you to understand what information we collect about you during your visit and what we do with that information.

Your visit to any of our Sites is subject to this Privacy Policy and our [Terms and Conditions](#). If you see an undefined term in this Privacy Policy, it has the same definition as in our Terms and Conditions.

1. INFORMATION COLLECTED

We ask for and collect the following personal information about you when you use Sites. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested Services.

While you may browse our Sites without providing any personal information. To allow you to place an order, we will ask you for your name, delivery and billing address, phone number(s), email address, credit card number, CVV, and its expiration date. If you choose to register to become a “distributor” with the Company, we may ask you for information such as your contact information (e.g., name, e-mail address and mailing address), or birth date. When you submit your personal identifiable information on one of the Sites, you are giving your consent to the collection, use and disclosure of your personal information as set forth in this Privacy Policy. We may also collect, store or accumulate certain non-personally identifiable information concerning your use of this Website, such as information regarding which of our pages are most popular, your IP address, browser, city, time zone, referring URL, and operating system. Information gathered may be used in aggregate form for internal business purposes, such as generating statistics, developing marketing plans, customizing content, and improving the Sites. We may share or transfer any non-personally identifiable information with or to our affiliates, licensees and partners.

All of our Sites are intended for adults. Our Sites and applications are not directed to children under 16 and we do not knowingly collect any personal information directly from children under 16. If you believe that we processing the personal information pertaining to a child inappropriately, we take this very seriously and urge you to contact us support@iGalen.com. If we otherwise obtain knowledge that we have personally identifiable information about a child under 16 in retrievable form in our files, we will delete that information from our existing files so that it is not retrievable.

2. HOW WE USE INFORMATION WE COLLECT

We may use, store, and process personal information to (1) provide, understand, improve, and develop the Sites and Services, (2) create and maintain a trusted and safer environment (such as to comply with our legal obligations and ensure compliance with the iGalen Policies and Procedures) (3) provide, personalize, measure, and improve our advertising and marketing, (4) to fulfill your

request for a product, information, or other service, or respond to an email or other request, as well as to create and deliver to you, communications containing product information, usage tips or promotions.

To enable or support us in providing the access to the Sites and Services, we may share your information, including personal information, within our corporate family of companies (both financial and non-financial entities) that are related by common ownership or control.

Additionally, we may contract with companies or individuals to provide certain services including email and hosting services, credit card processing, shipping, data management, surveys and marketing, promotional services, etc. (each such third-party, a "Service Provider"). We may share personally identifiable information with Service Providers solely as appropriate for them to perform their functions, but they may not use such information for any other purpose. We do not share your credit card or other account information with unaffiliated third parties unless necessary to fulfill our responsibilities including, but not limited to, delivering a product or service that you order. Finally, the Company may disclose personal information in special cases: (1) when we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) the rights of the Company or to anyone that could be harmed by such activities; (2) when we believe in good faith that the law requires it; (3) to any third party who may acquire the Company (subject to confidentiality restrictions); and (4) in situations involving threats to the physical safety of any person.

3. OPT-OUT OF COMMUNICATIONS

We want to communicate with you via email correspondence only if you want to hear from us. If for any reason you no longer wish to receive email messages from the Company, please unsubscribe in your back office account, or via the unsubscribe link provided at the bottom of the email announcement. Please note, if you opt not to receive marketing emails from the Company, you may still receive "Transactional" email messages regarding your order (i.e. order confirmation, shipping information, customer service notifications, etc.) If you have questions or concerns regarding this statement, contact us at support@iGalen.com.

4. OTHER IMPORTANT INFORMATION

Analyzing your Communications

We may review, scan, or analyze your communications on the Sites for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, analytics, and customer support purposes. For example, as part of our fraud prevention efforts, we may scan and analyze messages to mask contact information and references to other websites. In some cases, we may also scan, review, or analyze messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible. However, occasionally we may need to manually review some communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyze your messaging communications to send third party marketing messages to you, and we will not sell reviews or analyses of these communications.

These activities are carried out based on the Company's legitimate interest in ensuring compliance with applicable laws and our Terms and Conditions, preventing fraud, promoting safety, and improving and ensuring the adequate performance of our services.

Third Party Partners and Integrations

The Sites may contain links to third party websites or services, such as third party integrations, co-branded services, or third party-branded services ("Third Party Partners"). The Company doesn't

own or control these Third Party Partners and when you interact with them, you may be providing information directly to the Third Party Partner, the Company, or both. These Third Party Partners will have their own rules about the collection, use, and disclosure of information. We encourage you to review the privacy policies of the other websites you visit.

5. ENSURING YOUR SECURITY

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, and information access controls. We use Secure Sockets Layer (SSL), an advanced security protocol that protects your credit card information and ensures secure online ordering. SSL Internet connections are encrypted, and thus protect all credit card ordering information, including your name, address and credit card number, so it cannot be read in transit. Please note, however, that although we employ industry-standard security measures to safeguard the security of your personal information, no transmissions made on or through the Internet are guaranteed to be secure.

If you know or have reason to believe that your information has been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Company account, please contact us at support@iGalen.com.

6. INTERNATIONAL USERS

Like almost every website, our Sites may be accessed by an international audience. By visiting our Sites and providing us with data, you acknowledge and agree that your personal information may be processed for the purposes identified in this policy. To facilitate our global operations the Company may transfer, store, and process your information within our family of companies, partners, and service providers based in Europe, India, Asia Pacific and North and South America. Laws in these countries may differ from the laws applicable to your country of residence. By providing us with your data, you consent to the transfer of such data.

7. DISCLAIMER OF WARRANTY

THE COMPANY MAKES NO WARRANTY, EITHER EXPRESS OR IMPLIED, REGARDING THE SUFFICIENCY OF THIS POLICY IN PREVENTING THE IMPROPER OR UNWANTED DISCLOSURE OF INFORMATION. THE COMPANY SHALL NOT BE RESPONSIBLE FOR ANY ACTUAL OR CONSEQUENTIAL DAMAGES THAT RESULT FROM A BREACH OF THIS POLICY, ANY UNAUTHORIZED BREACH OF THE COMPANY SERVERS BY AN UNAUTHORIZED PARTY, OR FROM ANY SOFTWARE ERROR OR MALFUNCTION. TO ASSIST THE COMPANY IN PROTECTING YOUR INFORMATION, IT IS CRITICAL THAT YOU DO NOT SHARE YOUR LOGIN OR PASSWORD WITH ANY OTHER INDIVIDUAL OR ENTITY.

8. YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83 permits customers of the Company who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding twelve calendar months. If you are a California resident and would like to make such a request, please submit your request in writing to support@igalen.com.

9. CHANGES TO POLICY

The Company reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we decide to change our Privacy Policy, we will post the revised policy here. As we may make changes at any time without notifying you, we suggest that you periodically consult this Privacy Policy. Your continued use of the Sites and Services after the changes are posted constitutes your agreement to the changes, both with regard to information we have previously collected from you and with regard to information we collect from you in the future. If you do not agree to the changes, please discontinue your use of the Sites and Services.