

Privacy Policy

Effective Date: December 1, 2024

Introduction

Welcome to the privacy policy (“**policy**”) for the Metagenics LLC family of companies within the European Union and United Kingdom (“**we**”, “**us**” or “**our**”). We operate various websites and this policy applies to any website to which we have linked it (“**websites**”).

Please read this privacy policy carefully. By continuing to use our websites and by submitting personal data to us, you are agreeing to the terms of this privacy policy.

We respect and are committed to protecting the privacy of every individual who visits our websites. This privacy policy sets out how we protect and use information that we collect through your use of the websites, including any data you may provide when you access our websites, register with us, purchase a product, contact us, send us your feedback, attend a webinar or other instructional meeting, sign up to our newsletter or complete our customer surveys.

The websites are not intended for children and we do not knowingly collect data relating to children.

This privacy policy is designed to describe:

- 1. Who we are and how to contact us?**
- 2. What information do we collect about you?**
- 3. How is your personal data collected?**
- 4. How we use your personal data and why?**
- 5. When would we disclose your information?**
- 6. How long will you use my personal data for?**
- 7. Your rights and control of your information**
- 8. Changes to this privacy policy and your duty to inform us of changes**

1. Who we are and how to contact us?

For the purposes of the General Data Protection Regulation 2016/679/EU (the “**EU GDPR**”), the United Kingdom Data Protection Act 2018 (the “**Act**”) and the EU GDPR as it forms part of the law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 (the “**UK GDPR**”), the data controllers are:



- **Metagenics France:** Registered company number 331171314 and trading address: 10, Rue Michel Servet, Lille, 59000 France.
- **Metagenics Italia S.R.L.:** Tax code and Registration No. 07349230966 and trading address: Via Melchiorre Gioia 8, Milano 20124, Italy.
- **Metagenics Netherlands BV:** Registered company number 21017820 and trading address: Celsiusweg 20, Venlo, 5928PR, Netherlands.
- **Metagenics Belgium BV:** Registered company number 0881 352 886 and trading address: Edward Vlietinckstraat 20, Oostende, 8400, Belgium.
- **Nutri Advanced Ltd.:** with registered company number 01807526 and trading address: Meridian House, Botany Business Park, Whaley Bridge, High Peak, SK23 7DQ, United Kingdom.
- **Nutri Advanced Plus Ltd.:** with registered company number 591792 and trading address: Until 2404, Euro Business Park, Little Island, County Cork, Ireland.

If you would like to contact us about this privacy policy or our privacy practices, please contact us at dataprotection@metagenics.eu.

We welcome addressing any concerns you may have about our handling of your personal data; however, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the data protection regulator in the UK (www.ico.org.uk), the Data Protection Commission (DPC), the data protection regulator in Ireland (<https://www.dataprotection.ie/>), or the applicable data protection regulator in any of the countries we operate.

2. What information do we collect about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you access the site, contact us, register with us, book events or purchase products from us, voluntarily complete customer surveys or provide feedback and sign up to our newsletter, or to receive SMS updates, we may collect and process the following information:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier and title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products you have purchased from us, as well as your credit history.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.



- **Technical Data** includes mobile device ID, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services, including survey responses.
- **Professional Qualifications Data** if you are a health professional or other form of health advisor, which includes your professional associations, practitioner certificate/qualifications, specific areas of interest and where you studied.
- **Special Categories of Personal Data** includes data concerning your health. On some of our websites you may be able to voluntarily provide information about your health and your browsing or purchasing of some of our products or services could indicate a health condition. We collect and use this information to provide the services you request or fulfill the product orders you purchase. We do not collect other special categories of personal data such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, criminal convictions or offences, or genetic or biometric data for the purpose of uniquely identifying you.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - order our products;
 - create an account on our website;
 - request marketing to be sent to you;
 - sign up to our newsletter;
 - enter a competition, promotion or survey; or



- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our consent manager or the section Cookies within this Privacy Policy for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - analytics providers such as Google.

4. How we use your personal data and why?

We may use information about you in the following ways:

- To fulfill your product or service order;
- To improve our products and website, and ensure that content from our website is presented in the most effective manner;
- To provide you with information or products that you request from us, by email and/or SMS, and which we feel may interest you where you have asked or consented to be contacted for such purposes;
- To carry out our obligations arising from any contracts entered into between us and you;
- To notify you about changes to our products and services or important information such as product recalls or warnings;
- For our own market research purposes (for example to invite you to provide us with feedback on our products and services or answer a survey or questionnaire);
- To administer our website and for internal operations including trouble-shooting, security purposes, data analysis, testing and statistical survey purposes;
- For marketing and advertising purposes, including:
 - post or email (if you have subscribed to these), and for
 - telephone reminder campaigns (if you are not registered on the 'do not call' list ('don't call me back'), and
 - online advertising we display on our websites, the websites of our affiliates, or advertising we purchase for display on third party websites.
- For any other purpose for which you have provided your consent.



What is our legal basis for processing your Personal Data?

We will only use your personal data when the law allows us to. In respect of each of the purposes for which we use your personal data, the EU/UK GDPR requires us to ensure that we have a "legal basis" for that use. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract we are about to enter into or have entered into with you ("**Contractual Necessity**");
- Where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests ("**Legitimate Interests**"). More detail about the specific legitimate interests pursued in respect of each purpose we use your personal data for is set out in the table below;
- Where we need to comply with a legal or regulatory obligation ("**Compliance with Law**"); and,
- Where we have your specific consent to carry out the processing for the purpose in question ("**Consent**").

Generally, we do not rely on Consent as a legal basis for using your personal data other than in the context of direct marketing communications and placement of cookies.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal basis we are relying on to process your personal data where more than one basis has been set out in the table below.



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Contractual Necessity
To process your order and subscriptions including managing payments, fees and charges	<ul style="list-style-type: none"> • Identity • Contact • Financial • Transaction 	<ul style="list-style-type: none"> • Contractual Necessity
To manage our relationship with you which will include: <ul style="list-style-type: none"> • Notifying you about changes to our terms or privacy policy • Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing and Communications 	<ul style="list-style-type: none"> • Compliance with the law • Legitimate Interests (to keep our records updated and to study how customers use our products/services)
To enable your to partake in a prize draw, competition or complete a survey	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications 	<ul style="list-style-type: none"> • Contractual Necessity • Legitimate Interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • Legitimate Interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) or, where we use cookies to collect any such personal data, your consent. • Compliance with the law
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications • Technical 	<ul style="list-style-type: none"> • Consent, which may be express consent to marketing, or express consent to the use of cookies where we use cookies to collect your personal data for these purposes.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> • Technical • Usage 	<ul style="list-style-type: none"> • Legitimate Interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) or, where we use cookies to collect any such personal data, your consent.
To make suggestions and recommendations to you about goods or services that may be of interest to you and to contact you by email and/or SMS with our latest news, updates and offers	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile • Marketing and Communications 	<ul style="list-style-type: none"> • Consent, which may be express consent to marketing, or express consent to the use of cookies where we use cookies to collect your personal data for these purposes.

[View full size image here.](#)



What happens if you fail to provide us with the necessary personal data?

Where we need to collect your personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you our products). In this case, we may have to cancel an order you have with us but we will notify you if this is the case at the time.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have provided your consent to receive marketing communications from us, including by signing up to our newsletter; or to receive email or SMS messages with our latest news, updates and offers. If you no longer want us to use your contact data for our marketing purposes or to send you details about special offers or other information which we think may be of interest to you, please contact us at dataprotection@metagenics.eu or use the unsubscribe or 'opt-out' facility in our email communications, or by replying 'STOP' to any of our text messages.

Cookies

Our websites use cookies to distinguish you from other users of our websites. A cookie is a small file of letters and numbers that is stored on your computer or smartphone when you visit a website.

Cookies are useful as they help us to provide you with a good experience when you browse our websites, for example by storing your preferences and maintaining your shopping cart. They also help us to improve our websites.

We use the following types of cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas of our websites and to use a shopping cart.
- **Functionality cookies.** These are used to recognise you when you return to our websites. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our websites when they are using them. This helps us to improve the way our websites work, for example, by ensuring that users are



finding what they are looking for easily. Some of these are third party cookies which analyse website usage.

- **Targeting cookies.** These cookies record your visit to our websites, the pages you have visited and the links you have followed. We use this information to make our websites and the advertising displayed on them more relevant to your interests. We may share it with third parties to help tailor advertising to your particular interests.

The cookies we use and the purposes for which we use them changes from time to time. To find the current information about the individual cookies we use and the purposes for which we use them click on the cookies link in the footer of the website and click on the tab for “Cookie declaration” as shown below, or other such feature on other cookie control tool the website may use.

Example:



Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You can manage the cookies set by our websites using the cookies management tool available when you first navigate to our websites or by activating settings on the browser that you are using. However, if you use your browser settings to block all cookies (including essential cookies), some of our websites' features may not function as a result and you may not be able to access all or parts of our websites.

Please follow the relevant links below for further information regarding how you can manage your cookie preferences using your browser settings:

[Google Chrome](#)

[Microsoft Edge](#)

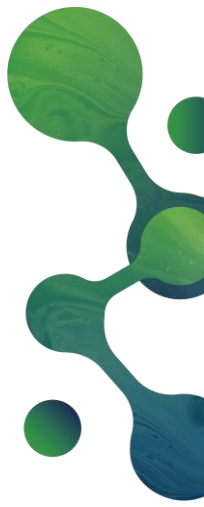
[Mozilla Firefox](#)

[Microsoft Internet Explorer](#)

[Opera](#)

[Safari](#)

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.



For further information about how to manage personalised advertising and marketing across multiple platforms, please visit the following:

[Your Ad Choices; Your Online Choices](#)

You can adjust your preferences regarding personalised advertising using the settings on social media platforms on which you have an account.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

Except for essential cookies, all cookies will expire after 2 years at the latest.

We regularly review our Privacy Policy and consent managers to ensure that they are up to date. This Privacy Policy was last updated as shown on the Effective Date at the top of the Privacy Policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact at dataprotection@metagenics.eu.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Security and the processing of your personal information

We understand that security is an important concern for you when shopping online. We take reasonable and appropriate steps intended to help protect personal data from unauthorized access, use, alteration, disclosure, and destruction. Our security technologies and procedures are regularly reviewed to ensure that they are up to date and effective. For further verification, look for the padlock symbol in your browser window as you proceed through the order and payment process.

Unfortunately, the transmission of information via the internet is not completely secure and we cannot guarantee the security of any information transmitted to or from our website. Any transmission is at your own risk and you should ensure that any payment transactions you make are made in a secure environment. You should keep confidential any personal security codes and passwords and comply with any instructions that we may give you in order to keep such details confidential and safe.



5. When would we disclose your information?

We may share your personal data with the following parties for the purposes set out in the table under section 4 above:

- Within the Metagenics family of companies based in the European Union and United Kingdom as set forth in Section 1 for administrative or support services.
- Other companies in our group who are based in the United States and Australia that may provide administration or support services and undertake leadership reporting.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- External third parties which may include the below:
 - Service providers acting as processors who provide identity verification and anti-money laundering check services.
 - Professional advisers acting as processors, separate controllers or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities acting as processors, separate controllers or joint controllers who require reporting of processing activities in certain circumstances.
 - Third Party providers acting as processors who assist us in running our business, including our payment and delivery service providers, marketing agencies, customer relationship management platform providers and website hosting providers.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only permit third-party service providers to use your personal data to process your personal data for specified purposes and in accordance with our instructions.

Third-party links

The websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

International transfers

We may share your personal data within our group, which may involve transferring your personal data outside the EEA and/or UK.



Some of our external third parties are also based outside the EEA and/or UK so their processing of your personal data may involve a transfer of data outside the EEA and/or UK .

Whenever we transfer your personal data out of the EEA and/or UK, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further information, please contact us at dataprotection@metagenics.eu; or
- We will take measures to comply with applicable data protection laws related to such transfers and use appropriate transfer solutions for any transfers of data outside the EEA and/or UK such by entering into approved standard contractual clauses. Please contact us at dataprotection@metagenics.eu if you want further information on the specific transfer mechanisms used by us when transferring your personal data outside of the EEA and/or UK.

6. How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

We will stop using your personal data for marketing purposes if you have not opened any of the messages we have sent to you for more than 24 months or, if earlier, when you opt-out or unsubscribe from such messages. We may still need to retain your personal data for other purposes (e.g. tax purposes) after this.

In some circumstances, you can ask us to delete your data. Please see your privacy rights below for further information.

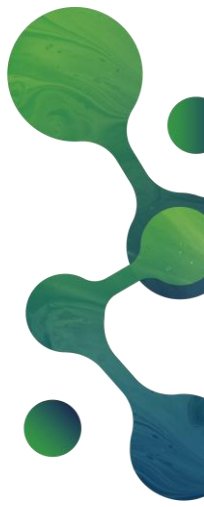
In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

7. Your rights and control of your information



You have the right to, at any time:

- **Request access to your personal data** (commonly known as a data subject access request). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no valid reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format (right to data portability). Note that this right only applies to



automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer at dataprotection@metagenics.eu.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated

8. Changes to this privacy policy and your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We will regularly review this Privacy Policy and adapt it in the event of changes to our data processing or in cases of legal changes which require us to update this document. The current version of the Privacy Policy can be found on our websites. The effective date is stated at the top of this Privacy Policy.

