

## GDPR PRIVACY NOTICE

Roseto della Vita, LLC ("We") are committed to protecting and respecting your privacy. This privacy notice (together with our [Terms of Use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you or that you provide to us, will be processed by us.

On 25 May 2018, the General Data Protection Regulation ((EU) 2016/679) ("GDPR") came into effect in the European Union and European Economic Area. This gives European Union ("EU") data subjects (living individuals in respect of whom personal data is processed) enhanced rights and protections in relation to their personal data. We are committed to safeguarding the privacy of the users of our services. Therefore, we have updated our GDPR Privacy Notice, so we are completely clear as to what personal data we collect, why we collect that personal data, and how we handle it. We, Roseto della Vita, LLC, of 3651 South La Brea Avenue #1227, Los Angeles, California 90016 USA are the Data Controller (as that term is defined in data protection legislation).

### 1. What information do we collect from you?

**We may process the following data about you:**

#### 1.1 Information you give us.

What personal data might you supply to us?

How and why we process your personal data:

**Account information:** Information about you that relates to your or your employer's account with us. This information may include your name, your email address, and your telephone and/or mobile number. We will process this data to maintain your account with us, to provide our services to you, to communicate with you and to back up our database. The reason we process this data is to ensure the proper administration of your account and our business (our legitimate interests) and, where you have entered into a contract with us, for the purposes of fulfilling our contract with you.

**Registration Information:** Information you provide when you register to use our Website, participate in discussion boards or other social media functions on our site, enter a sweepstake, promotion, or survey, and when you report a problem with our site. The information you give us may include your name, address, email address, and telephone number. We will process this data so we can deal with your registration, or other communications or applications, or to address your query or concern. The reason we process this data is to ensure the proper administration of your registration and our business (our legitimate interests).

**Transaction Data:** If you purchase goods and/or services from us, you will need to provide certain information to us so that we can supply those goods and/or services to you. The information you supply to us may include your name, your contact details, your credit card details, and other information relevant to your transaction. We will process that data in order to perform our contract with you and to fulfil the transaction. This is also our reason for processing the data (our legitimate interest).

**Communication Data:** If you communicate with us, we may process the information contained in your communication (for example an email, chat box session, forms, letters, or faxes, etc). This information may include your name and contact information, the content of your communication, and any metadata our Website generates where you communicate with us using the contact form available on our Website. We will process that information so we can correspond with you and keep records of such correspondence. The reason we are processing this data is to ensure the proper administration of our business (our legitimate interest).

**Notification Data:** Where you have purchased goods/services from us, or where you subscribe to receive our email notifications and/or newsletters, we will process your data so that we can send such email notifications and/or newsletters to you. If you prefer not to receive such communications, please click our unsubscribe option. The legal basis for us processing this data is that you have consented to such processing.

**Regulatory Data:** We may process your data if we need to do so in order to comply with our legal and/or regulatory obligations so that we can protect the vital interests of you or another natural person. The reason we will process such data is to protect the vital interests of you or another natural person.

### 1.2 Information we collect about you.

With regard to each of your visits to our Website, we will automatically collect the following information:

(a) Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We will obtain this data through our analytics tracking system. We process this data so we can monitor and analyze how our Website is used so we can improve our Website and our services (our legitimate interests).

(b) Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through, and from our Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. We process this data so we can monitor and analyze how our Website is used so we can improve our Website and our services (our legitimate interests).

### 1.3 Information we receive from other sources.

This is information we receive about you if you use any of the other websites we operate or the other services we provide. We operate in the EU through Roseto della Vita, LLC[or RDV]. RDV shares personal data with us so that we can fulfil orders, etc. We do not share personal data relating to our customers with RDV. You can view **RDV's Privacy Policy**. We are working closely with third parties (including, for example, business partners; sub-contractors in technical, payment, and delivery services; advertising networks; analytics providers; search information providers; etc.). We may receive personal data about you from these organizations. Those organizations will have their own privacy policies detailing how they process personal data.

## 2. Cookies

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookies Statement.

## 3. When will we disclose your personal data to others?

3.1 We may need to share your personal information with members of our group, which means our subsidiaries, our ultimate holding company, and its subsidiaries. We will only share such personal information where this is necessary for the purposes set out in this notice.

3.2 We may need to share your personal information with certain selected third parties including:

(a) Our business partners, suppliers, and sub-contractors for the purpose of performing any contract we have with you or them. In particular, we use third-party companies to process your personal data in order to deliver our products to you; process your credit card transactions; provide subject-matter expert services; or reply to electronic communications with you

(b) Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in postal code SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;

(c) Analytics and search engine providers that assist us in the improvement and optimization of our Website.

3.3 We will also disclose your personal information to third parties in the following circumstances:

(a) If we sell or buy any business or assets, in which case we may need to disclose certain personal data to the prospective seller or buyer of such business or assets.

(b) If all or most of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.

(c) If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any legal agreement we have with you; or to protect our rights or property, or the safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

(d) We may contract with third-party providers to perform certain functions on our behalf or to enhance our existing product and service offerings. Examples include providing marketing, product, and service support. When we contract with these third parties, we do not permit them to use or disclose your information for any purpose other than the work they are doing on our behalf or as required by law.

#### **4. Where do we store your personal data?**

We will always try to ensure that your US personal data is processed in the United States where data relates to US citizens. In some circumstances, this will not be possible.

In circumstances where it is necessary for us to transfer your EU personal data outside the European Economic Area, we will only transfer such EU personal data to third parties where we have carried out due diligence on such third parties to ensure they will protect your EU personal data using similar standards and safeguards as we have. We will also have contractual provisions in place with such third parties to ensure your EU personal data is protected. Such contractual provisions will be based on the standard contractual clauses approved by the European Commission for the transfer of data outside the EEA or such other appropriate standards as are required from time to time by the European Commission or the UK Government. You consent to the transfer of your EU personal data outside of the EEA, as long as we comply with these requirements.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. We recognize the importance of maintaining the security of your information. We have implemented technical, administrative, and physical security measures designed to protect your information from unauthorized access, disclosure, use, and modification. No security system is perfect and we cannot promise, and you should not expect, that your information will be secure in all circumstances.

#### **5. Storage and deletion of personal data**

(a) Any personal data that we process will be deleted from our systems once we have completed the purpose for which we were processing the personal data. In some cases, the purpose for which we are processing your personal data will last for a considerable period (for example, if you are a long-term customer of ours, we will need to store your data until our relationship with you comes to an end).

(b) We will determine the period for which we need to retain your data, acting reasonably, and taking into consideration a number of factors such as your relationship with us, your engagement with us, and the fulfilment of contracts we have with you.

(c) We may need to retain your personal data where this is necessary to comply with our legal or regulatory obligations, or to protect your vital interests or the vital interests of another natural person.

#### **6. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorized way; altered; or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach, and we will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. Your rights

7.1 Under data protection laws you have the following fundamental rights:

- (a) The right to access the personal data we hold about you;
- (b) The right to have your personal data corrected if there are errors or inaccuracies in it, or your personal data is incomplete;
- (c) The right to restrict the processing we carry out in relation to your personal data;
- (d) The right to object to the processing we carry out in relation to your personal data;
- (e) The right to have the personal data we hold about you provided to you in a useable format;
- (f) The right to complain to a Supervisory Authority about how and/or why we are processing your personal data;
- (g) The right to tell us you no longer consent to us processing your personal data. In practice, you will usually agree in advance to us using your personal data for marketing purposes and if you no longer wish to allow us to use your personal data for marketing purposes, you can opt out of receiving such marketing messages at any time. You can do this either by unsubscribing from the marketing messages we send you, notifying us in writing us at [rdv@rosetodellavita.com](mailto:rdv@rosetodellavita.com) or updating your marketing preferences.

7.2 You can ask us to provide you with details of any personal data we hold about you. You do not have to pay us a fee to access your personal data unless we believe your access request is unfounded, repetitive, or excessive. In this case, we may charge you a reasonable fee to access your personal data or we may decide not to comply with your request. We will notify you if this is the case. We will require you to provide appropriate evidence of your identity before we respond to your request.

7.3 Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, these websites have their own privacy policies. We do not accept any responsibility or liability for these policies on other websites. Please check these policies before you submit any personal data to these websites.

7.4 If you think that any of the data we hold about you is incorrect or inaccurate, you can contact us to correct such data. Please contact us at [rdv@rosetodellavita.com](mailto:rdv@rosetodellavita.com) for these purposes.

## 8. Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page.

## 9. Information about us

This privacy notice relates to Roseto della Vita, LLC. We are a company registered in the State of California in the USA. Our registered office address and main place of business is at 3651 South La Brea Avenue #1227, Los Angeles, CA 90016 USA. We can be contacted by post at this address: Roseto della Vita, LLC., 3651 South La Brea Avenue #1227, Los Angeles, CA 90016 USA; using our Website contact form; or by email at [rdv@rosetodellavita.com](mailto:rdv@rosetodellavita.com).

## 10. Any questions?

Questions, comments, and requests regarding this privacy notice are welcomed, and can be addressed to our Information Security Officer, 3651 South La Brea Avenue #1227, Los Angeles, CA 90016 USA.