

## PRIVACY NOTICE

Welcome to the ROSETO DELLA VITA Privacy Notice (“**Privacy Notice**”).

Roseto della Vita, LLC (“**ROSETO DELLA VITA**,” “**RDV**,” “**we**,” “**us**,” or “**our**”) is a Well-Being Consulting Company. We’ve created this resource to provide you with valuable transparency and choice on how we might collect, use, and share your personal information as a consumer (or visitor) to the website(s) of one of our affiliate partners or advertisers.

### Scope of this Privacy Notice

To make some of our services possible and to make smarter decisions, we need to process consumer personal information. This Privacy Policy is intended to describe how your personal information as a consumer is collected and used by ROSETO DELLA VITA while providing our consulting and affiliate marketing services. We believe that your privacy and data protection is essential to the growth and prosperity of the internet, and that a great online experience can provide significant benefits to consumers when done properly. In accordance with these beliefs, ROSETO DELLA VITA strives to create results for our partners and clients in revolutionary ways without compromising privacy.

This Privacy Notice is created and maintained as part of our commitment to provide you with transparency and choice on how we process their personal information. We have taken steps to describe our personal information processing activities as clearly and easy-to-read as possible and encourage you to read the entire Privacy Notice. If you still have questions about our privacy practices, you can always contact us directly at [edie.b@rosetodellavita.com](mailto:edie.b@rosetodellavita.com)

### I. Overview of ROSETO DELLA VITA and Affiliate Marketing

When you visit websites and mobile applications, there are almost always third parties working behind the scenes to help provide a great digital experience. ROSETO DELLA VITA is one of these companies and we offer affiliate marketing technology and services that keeps your favorites in business and your experience with brands more relevant.

#### 1. What do we do?

We provide evidenced based Well-Being Lifestyle Information and Consulting Services for ease in Daily Holistic Living Implementation as well as align with Affiliate Marketing Partnerships (for example, a retailer, brand, person, or company). ROSETO DELLA VITA will promote products or services from these Partnerships to visitors and earn a percentage of the profit for each transaction generated. ROSETO DELLA VITA operates an **affiliate partnership network**, which helps our clients and community partner with each other. An affiliate network is the platform used by vendors, companies, and advertisers to discover and form new partnerships, define criteria for qualified marketing efforts and is used to ensure that appropriate parties are rewarded for qualified activities.

## 2. Privacy by Design

We have a deep-rooted foundation and culture of privacy and data protection at ROSETO DELLA VITA. We integrate privacy in all aspects of our business, including strategy, product development, delivery, and more. We set a ‘privacy-first’ tone early and often, proactively working to limit our data collection to what is necessary to provide our services.

In that spirit, ROSETO DELLA VITA does not collect, store, process, or allow in our systems any of your personal information that is linked, or is intended to be linked, to an identified individual, such as names, addresses, phone numbers, email addresses, driver’s license numbers, or financial account numbers, which we define as directly identifiable information (“DII”). We have built, and continue to build, all our products and services without the use of any DII.

As part of our Privacy by Design philosophy, we consider and prioritize data protection and privacy throughout the entire lifecycle of the data from before it is collected to when it is ultimately destroyed. We constantly strive to maintain unparalleled visibility with consumers. We provide transparency and choice through our website and encourage the same practice throughout the internet.

## II. Information Collection & Use

Unless voluntarily provided by you, ROSETO DELLA VITA does not collect or use any DII. Instead, ROSETO DELLA VITA only processes pseudonymous personal information. Pseudonymous or pseudonymized personal information is information that does not directly identify a specific consumer without the use of additional information. ROSETO DELLA VITA only collects and processes personal information in a pseudonymous format and has both technical and organizational measures in place to make sure that additional information is not used to identify or link that pseudonymous information to an identified consumer. Some examples of pseudonymous information that we process include IP addresses, Cookie IDs, or referring site website addresses, order IDs, and browsing activity. We do not link or attribute pseudonymous information to DII, such as your name, email address, or phone number.

Using pseudonymous information allows us to see and understand your journey between partners and advertisers without revealing to us your identity. In other words, we do not directly identify you using the pseudonymous information that we process. In fact, we have no interest in knowing your DII details, and we work to proactively keep such information out of our systems. We will only ever collect DII if it is expressly provided to us, such as when you contact us on your own initiative via our contact form or otherwise. Even in these instances, we will not tie this DII to pseudonymous information about you that we may have, such as your site browsing or transaction data.

### **Pseudonymous Information Collected by ROSETO DELLA VITA**

The majority of the data that ROSETO DELLA VITA processes is machine generated and is collected when a consumer visits and interacts with one of our advertisers or partners, such as a website or mobile application that leverages our services.

Such information includes the following:

- **Commercial or transactions information:** *E.g.*, information relating to online purchases and actions made by you, order IDs, order timestamps, and other purchasing information of products and services.
- **Identifiers and Device Information:** *E.g.*, hashed emails, mobile identifiers (such as IDFA or AAID), Cookie IDs, user agent strings which provides browser type and version, and IP address.
- **Online browsing activity information:** *E.g.*, browsing activity and information on your interaction with a website, application, or advertisement where our technology is deployed, such as clicks, ad impressions, time stamps, referring site URLs, and current site URLs.
- **Location data:** *E.g.*, location information based on IP addresses.

## 1. How ROSETO DELLA VITA Collects Pseudonymous Information

**Information Collected Online:** We collect the types of pseudonymous information identified above in a variety of ways. However, we principally use reporting technologies, such as cookies, pixels, tags, or other similar technologies to collect the pseudonymous information we need to provide our services. We leverage these technologies to collect the necessary pseudonymous information from you directly as you navigate or interact with our advertisers and partners.

**Information Received from Clients:** Our clients may also provide us with information relating to their customers, prospective customers, or other individuals, which we handle on the behalf of our clients as a service provider. Our clients are independently responsible to determine how they engage with their customers and determine the handling of their customer data. Under these circumstances, the use of such personal information is subject to the privacy policies of the client's privacy policies. We are not responsible for the privacy practices of our clients, and accordingly, this Privacy Policy and the rights acknowledged herein do not apply to the data that ROSETO DELLA VITA handles on behalf its clients.

## 2. ROSETO DELLA VITA's Purposes for Collecting Pseudonymous Information

ROSETO DELLA VITA collects pseudonymized personal information for a variety of purposes, as detailed below.

**Attribution:** ROSETO DELLA VITA primarily uses pseudonymous information to attribute a referral or marketing effort by a partner to an event or transaction with an advertiser. When a consumer responds to or views an affiliate advertisement served by one of our partners, we may assign a unique identifier that is tied to that consumer's internet browser or device, often via a cookie or similar technology. One function of these technologies is to provide ROSETO DELLA VITA with the information needed to facilitate the verification and payment of affiliate commissions to a partner when a consumer clicks on a link, creates a lead, or makes a purchase directly on an advertiser's website. Even if the consumer re-visits the advertiser's site directly, ROSETO DELLA VITA is able to recognize the unique identifier assigned earlier and is able to continue to attribute the consumer's activities on the advertiser's site and credit the partner that referred the consumer where appropriate.

**Cross-Device Reporting:** We may also collect pseudonymous information across multiple browsers or devices to help us more accurately credit a partner for their referral or marketing effort. Our cross-device reporting allows us to follow your journey from a partner to a potential transaction even if you decide to switch browsers or devices throughout that journey.

**Insights and Analytics:** ROSETO DELLA VITA also uses the pseudonymous information collected to provide our partners and advertisers with reports to help with their marketing efforts. This information is generally used by our clients to enhance their ad campaigns, such as by learning where the optimal ad placement is on their website, or learning what type of products or services consumers are more interested in. We will generally aggregate or de-identify any pseudonymous information prior to compiling these reports so that it is no longer technically feasible for the data to be linked to you, your device, or your household (“**aggregated information**”). For example, to measure the effectiveness of an ad or ad campaign, we may compile a report indicating how many unique individuals clicked on an ad. The report, in this example, would only consist of the ad itself and the total number of unique clicks, with no means for the recipient of the report to relate the clicks back to any particular individual. While many of these reports are at the aggregate level, we also produce reports that contain customer-level pseudonymous information. These reports can help our clients identify areas of growth, such as identifying new partnerships or customer audiences.

**Internal Business Purposes:** ROSETO DELLA VITA may also collect and process personal information for some of our internal business purposes, such as:

- Auditing transactions, such as, counting ad impressions, verifying positioning and quality of ad impressions.
- Auditing our systems and services for compliance with applicable regulations and standards.
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of a single interaction.
- Performing services on behalf of our advertisers or partners, such as maintaining or servicing accounts, providing customer service.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of our systems and services, and to improve, upgrade, or enhance our systems and services.
- Other purposes as required or permitted by applicable law, or with your consent.

### III. Information Sharing by ROSETO DELLA VITA

We only share your information for our limited business purposes, as described in this Privacy Notice, including:

**Sharing with ROSETO DELLA VITA’s Partners and Affiliates:** We may share your personal information with companies affiliated with ROSETO DELLA VITA under Publicis Groupe for the purposes described in this privacy policy.

**Sharing with Service Providers:** We may share your personal information with service providers to assist or facilitate in the services we provide to our clients, such as vendors, administrative service providers, technology providers, and carefully selected partners for services including, but not limited to, data validation, enhancement, information verification and suppression services.

**Sharing with Third Parties:** We may share your personal information and/or aggregated information with third parties including advertisers, promotional partners, sponsors, and partners, for the purposes stated above in this Privacy Notice, including for attribution, cross-device reporting, and insight and analytics purposes.

**Sharing for Legal Purposes:** In addition, we may share personal information with third parties in order to: (a) comply with legal process or a regulatory investigation (e.g. a subpoena or court order); (b) enforce our Terms of Service, this Privacy Notice, or other contracts with you, including investigation of potential violations thereof; and/or (c) respond to claims that any content violates the rights of third parties.

**Sharing for Fraud Prevention & Safety:** We may share your personal information with third parties or service providers to protect the rights, property or personal safety of us, our platform, our customers, our agents and affiliates, its users and/or the public. We likewise may provide information to other companies and organizations (including law enforcement) for fraud protection, and spam/malware prevention, and similar purposes.

**Sharing in the Event of a Corporate Transaction:** We may also share personal information in the event of a major corporate transaction, including for example a merger, investment, acquisition, reorganization, consolidation, bankruptcy, liquidation, or sale of some or all of our assets, or for purposes of due diligence connected with any such transaction.

**Sharing with your Consent:** We may also share your personal information for any other purpose with your consent when a specified account is created.

#### **IV. Protecting Personal Information**

In addition to our Privacy by Design philosophy, ROSETO DELLA VITA takes extra steps to ensure that any personal information collected and retained is secured and protected from unauthorized access.

##### **1. Security and Data Integrity**

ROSETO DELLA VITA takes steps to help ensure that the data we possess is housed and transmitted securely. This may include various types of physical and electronic security, including firewall protections, encryption, hashing or truncation of data, and access controls to personal information. While neither we nor any platform can guarantee 100 percent safety from hacks or illegal intrusion, we employ efforts that are designed to ensure that this does not occur.

##### **2. Retention**

ROSETO DELLA VITA retains pseudonymized information collected online for 6 years, at which point such information is disassociated from the applicable consumer. Aggregated/De-Identified reports generated from such data may be retained for a longer period as ad delivery and reporting data.

## V. Notice to California Residents

If you are a California resident, the California Consumer Privacy Act of 2018 (“CCPA”) requires certain additional information be provided regarding your rights with respect to your personal information. Please do not rely on the below information and disclosures in this section or otherwise directed to California residents if you are not a resident of California.

### 1. Your California Rights and Choices

California law allows you to make certain requests about your personal information, including pseudonymous information. Specifically, under the CCPA you have the right to **request access** to certain personal information we hold about you, to request that we **delete** that information, and to opt out of the “sale” of your personal information. However, ROSETO DELLA VITA does not “sell” your personal information as defined by the CCPA.

To understand the categories of personal information we have collected in the last 12 months, as well as our purposes for such collection, please review the “Information Collection and Use” section above. To understand the categories of parties with whom we have shared the categories of Personal Data within the past 12 months, please see the “Information Sharing by ROSETO DELLA VITA” section above. Please note that certain information may be exempt from such requests under California law. We also will take reasonable steps to verify your identity before responding to a request. Since ROSETO DELLA VITA does not maintain any directly identifiable information about consumers, we will verify you by reading the Cookie ID associated with your browser. You can submit requests to access and delete your personal information by contacting us at [edie.b@rosetodellavita.com](mailto:edie.b@rosetodellavita.com)

### 2. Right to Nondiscrimination

We do not deny, charge different prices for, or provide a different level of quality of goods or services if you choose to exercise these rights.

### 3. Authorized Agents

You may also designate an agent to make requests to exercise your rights under CCPA as described above. We will take steps both to verify the identity of the person seeking to exercise their rights as listed above, and to verify that your agent has been authorized to make a request on your behalf through providing us with a signed written authorization or a copy of a power of attorney.

## VI. Modifications to this Privacy Notice

From time to time, we may update this Privacy Notice. Any changes to it will become effective when it is posted to our website. You can determine when this Notice was last revised by checking the “Last Modified” legend at the top of this Policy. Please check back periodically to learn of any changes to this Privacy Notice relating to 01-Jan-2023 Amendments.

## VII. Contact Us

For any additional questions, inquiries, or complaints concerning ROSETO DELLA VITA's privacy notice, please contact us at [edie.b@rosetodellavita.com](mailto:edie.b@rosetodellavita.com)

If you are looking for our privacy notice as it relates to information collected from our website or our business-to-business contacts, please contact us at [edie.b@rosetodellavita.com](mailto:edie.b@rosetodellavita.com)

If you are a visitor from the EU, please visit our dedicated EU Privacy Policy.

## VIII. Definitions

**“Cookies”** are small text files that are downloaded and stored onto your device (e.g. a computer or smartphone). Cookies allow us to recognize your device and store information about your preferences or past actions. In this Privacy Policy the definition of “Cookies” includes similar technologies that can write or read information on your device such as **“Local Shared Objects”** (sometimes called Flash Cookies), pixels and web-beacons. There are many misconceptions about cookies. Cookies cannot erase your hard drive, install programs, or collect PII from your browser or device.

**“Reporting Technologies”** means any technology, tool, or code (including cookies, pixels, SDKs, APIs, local shared objects, web-beacons, tags, and scripts) that enables access to or storage of information on a device.

**“Log files”** track actions occurring on Sites and collect data including, as an example, your IP address, browser type, Internet service provider, referring/exit pages, operating system, date/time stamp, click data and types of advertisements viewed.

**“Pixels or Web beacons”** are objects that are embedded in a web page or e-mail and are usually invisible to the user but are used to track a web user's navigation of a website or collection of websites or pages, interaction with an e-mail, use of mobile applications, the completion of transactions, submittal of applications and browsing behavior.