# **NU SKIN GLOBAL PRIVACY NOTICE**

## LAST UPDATE: January 30, 2024

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### 2. Overview

At Nu Skin, we want to set the standard for the industry in data protection. To that end, Nu Skin is committed to respecting and protecting your privacy rights and your choices and to treating your Personal Data with the utmost care in all circumstances.

Our Privacy Notice is designed to provide transparency into our privacy practices and principles in a format that is easily understandable and readable.

This Privacy Notice explains how we process the Personal Data we collect about you

- when you buy and/or use our products, services and mobile applications,
- when you browse our Websites and social media content,
- when you participate in events organized by us,
- when you visit our premises, or
- when you apply for a job at Nu Skin.

Please ensure you read this Privacy Notice carefully before using our Websites or mobile applications and/or providing us with your Personal Data.

### 3. Who we are and how to contact us

Nu Skin Enterprises Inc. and its affiliates and subsidiaries ("Nu Skin", "we", "us" and "our") are an international group of companies offering personal care products, nutritional supplements, devices and other goods or services through (i) the Nu Skin websites (whether local or global) (each a "Website"), (ii) Nu Skin mobile applications and tools (the "Apps") and (iii) a network of independent distributors or sales people ("Brand Affiliates1").

Depending on who you are or how you interact with us, your Personal Data are processed by different entities of Nu Skin and/or for different purposes. You will find here (Annex 1) the list of the Nu Skin entities acting as data controllers responsible for processing your Personal Data. Please contact the Privacy Team or our Data Protection Officer [DPOoffice@nuskin.com] if you have questions or concerns, want to update your Personal Data, or to exercise your rights as described below.

### 4. What Personal Data do we collect?

Personal Data, or Personal Information, means any information or pieces of information that could identify you directly (e.g. your name) or indirectly (e.g. through your email address or telephone number). Personal Data may include a name, an (email) address, a telephone number, credit card information, preferences, age, gender, or occupation, among other things.

The Personal Data that we collect, and how we collect it, depends on how you interact with us. For a complete overview of the Personal Data we process about you, as well as our interaction-specific data processing activities, and our processing purposes, please refer to

our "List of Personal Data Processing Activities", here.

We might collect or receive Personal Data from you via our Website, Apps, social media channels, call center or when you otherwise transfer Personal Data to us. Sometimes you give this Personal Data to us directly (e.g. when you create an account, when you contact us, when you purchase from our Website), and sometimes we collect it (e.g. using cookies to understand how you use our Website and Apps, or through our smart devices).

In some circumstances we may also receive Personal Data about you from:

- Brand Affiliates;
- individuals who provide us with your Personal Data (e.g. your family members);
- regulatory bodies;
- other companies providing services to us (e.g. social listening companies; past employers; recruitment agencies).

Some of these third-party sources may include publicly available sources of information. In particular, we may receive Personal Data from social networks when you engage with our content, reference our Website, or grant us permission to access information from these social networks.

In addition, where permitted by law, we may collect, either directly or through third party service providers, information that is publicly available on the Internet (e.g. from websites, blogs, social media).

### 5. How we use your Personal Data

We process your Personal Data based on the following legal grounds, as permitted by applicable law:

- to fulfill our obligations under a contract with you, or to take steps prior to entering into a contract with you (e.g. you ask us to create a customer account for you or you wish to purchase a product from us);
- to comply with a legal obligation (e.g. when you make a purchase we need to keep your transaction information to comply with our tax, financial reporting, and consumer protection obligations);
- when it is in our legitimate business interest to use your Personal Data (e.g. to operate, evaluate and improve our organization; to prevent and protect us and others against fraud, unauthorized transactions, claims and other liabilities; to ensure compliance with company policies and industry standards);
- based on your consent (e.g. when you opt-in to subscribe to our marketing newsletters).

Our use of your Personal Data depends on who you are and how you interact with us. Click here for a list of the ways that we use your Personal Data, and which of the reasons we rely on to do so.

We will only process special categories of Personal Data (e.g., race or ethnicity; health-related data) when you request us to do so (i.e. when we have your explicit consent) or in exceptional circumstances and where we have a legal basis to do so (e.g., to protect your vital interests).

Please contact the Privacy Team if you have any questions about how we collect and use your Personal Data.

### 6. Sharing and transferring your Personal Data

When we share your Personal Data as described below, we will take the necessary steps to ensure that any third-party recipients have implemented reasonable security mechanisms to protect your Personal Data.

#### a. We do not sell your Personal Data

First, we want to be clear that we do not and will not sell your Personal Data to third parties; and in the past 12 months, we have not

sold your Personal Data to any third party.

#### b. We do not disclose your Personal Data to third parties for their own direct marketing purposes

Also, we do not disclose your Personal Data to third parties for their own direct marketing purposes. However, if you direct us to share your Personal Data with third-party sites or platforms, such as social networking sites, these third-party sites or platforms could potentially use your data for marketing reasons.

#### c. If you are a Brand Affiliate, we may share your Personal Data with other Brand Affiliates2 and customers

With your Downlines – If you are a Brand Affiliate, we may transfer your Personal Data to your personally sponsored customers and Brand Affiliates ("Downlines") in order to enable them to reach out to you for support, training and product recommendations. The Personal Data we make available to your Downlines may include your name, profile picture, and contact details. If you do not want your Downlines to have access to your Personal Data, you can edit your privacy settings in V&G, your account or by contacting customer care.

With your Uplines – We may also transfer your Personal Data to your sponsor, upline Brand Affiliates and upline Brand Representative ("Uplines") so that they can reach out to you and provide you with business and/or product support and training, . The Personal Data we make available to your Uplines may include your account information (name, photo, birthday, contact details), business information (market, overall purchase volume and volume generated by your ADR contract (auto-ship) and date it is scheduled to ship, pin title, activity dates) and your order information including your purchases (product name, quantity, volume, price, order tracking, ship to details), as well as auto-ship contract details (product name, quantity, price, ship to details). You can manage what Personal Data is shared with which Uplines by editing your privacy settings in V&G, your account, or by contacting customer care. In addition, we may inform your Uplines about your qualification to our incentive trips.

#### d. If you are a customer, we may share your Personal Data with certain Brand Affiliates

We may transfer your Personal Data to your sponsor, upline Brand Affiliates and upline Brand Representative ("Uplines") so that they can reach out to you and provide you with product support and recommendations. The Personal Data we make available may include your account information (name, photo, birthday, contact details), and your order information including your purchases (product name, quantity, volume, price, order tracking, ship to details), as well as auto-ship contract details (product name, quantity, price, ship to details). You can manage what Personal Data is shared with your sponsor by editing your privacy settings in your account, or by contacting customer care.

#### e. We may share your Personal Data within the Nu Skin group

Your Personal Data may be accessed within Nu Skin. This means that we may share your Personal Data across the Nu Skin group of companies, which includes our ultimate parent company and its affiliates and subsidiaries. Access will always be controlled on a need-to-know basis, and only provided where it is necessary to provide you with requested services or to allow us to perform any necessary or legitimate functions (including for operational, management, administrative, supervisory or evaluative or educational purposes). You may consult the list of Nu Skin entities that may receive your data here (Annex 1) and a list of data processing purposes and categories here (Annex 2).

#### f. We may share your Personal Data to our trusted third-party suppliers who may process it on our behalf

We rely on trusted third parties to perform a range of business operations on our behalf. We always use our best efforts to ensure that all third parties we work with will keep your Personal Data secure. We only provide them with the information they need to perform the service, and we require that they do not use your Personal Data for any other purpose. For example, we may entrust services that require the processing of your Personal Data to:

- Third parties that assist and help us in providing digital and e-commerce services such as social listening, store locator, loyalty programs, identity management, ratings and reviews, CRM, web analytics and search engine, user generated content curation tools;
- Advertising, marketing, digital and social media agencies to help us deliver advertising, marketing, and campaigns, to analyze their effectiveness, and to manage your contact, questions and our relationship;

- Third parties required to deliver a product to you (e.g. postal/delivery services);
- Third parties that assist and help us in providing IT services, such as platform providers, hosting services, maintenance and support on our databases as well as on our software and applications;
- Third parties that assist in maintaining the security of our systems, Websites and Apps;
- Third parties that provide us with consulting services in the field of market research and analytics, collect feedback and conduct market surveys on our products, services and otherwise for customer relationship management purposes;
- Payment service providers and credit reference agencies for the purpose of assessing your credit score and verifying
  your details where this is a condition of entering into a contract with you;
- Third parties that assist us for customer care and cosmetovigilance and pharmacovigilance purposes;
- Third parties that assist us for the organization of events, incentive trips, meetings, etc. in which you may participate;
- Lawyers, auditors, financial advisors, and other third party service providers in connection with their services to Nu Skin.

#### g. We may also disclose your Personal Data to other third parties

If Nu Skin or a part of its assets are acquired by a third party, Personal Data we hold relating to those assets will be one of the transferred assets. In such cases, your Personal Data will be processed by the buyer acting as the new controller and its privacy policy will govern the processing of your Personal Data.

We may also disclose your Personal Data to any regulatory, statutory, governmental or other relevant authorities, agencies or bodies and industry regulators, and any other person to whom Nu Skin is compelled, required or permitted to do so by law, rules or regulations, legal process or litigation, or to any person pursuant to any order of a court of competent jurisdiction or comparable legal process.

In other circumstances if we have your consent or we are permitted to do so by law.

### 7. International Transfers

#### a. International data transfers

You understand and agree that we may transfer Personal Data to other jurisdictions as necessary for the purposes described in this Privacy Notice, including to jurisdictions that may not provide the same level of data protection as the jurisdiction in which your Personal Data was originally collected. For instance, we may transfer your data to the U.S. because our parent companies are located there.

When we transfer your Personal Data to other countries or jurisdictions, we will protect that data as described in this Privacy Notice and in accordance with applicable law. Where required under applicable law, we will put in place binding contractual obligations with the data recipient to safeguard your data protection rights. Furthermore, we will notify any data transfer and/or data transfer mechanisms to the competent Supervisory Authority where required under applicable law.

With respect to transfers originating from the European Economic Area ("EEA") to the United States and other non-EEA jurisdictions, we implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers as required or permitted by Articles 46 and 49 of the General Data Protection Regulation. Please contact the **Privacy Team**, if you have any questions with respect to the safeguards we have put in place to protect your Personal Data when we transfer this (including how to obtain a copy of or consult these safeguards).

#### b. Data Privacy Framework

Nu Skin International Inc. (NSI) complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Privacy Framework as set forth by the U.S. Department of Commerce. NSI has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to

the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and the from the UK in reliance on the UK Extension to the EU-U.S. DPF. NSI has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF.

Nu Skin is committed to the DPF Principles in connection with all personal data received from the European Union and, as applicable, the United Kingdom and/or Switzerland in reliance on the relevant parts of the DPF program. If there is any conflict between the terms in this privacy notice and the DPF Principles, the DPF Principles shall prevail.

To learn more about the Data Privacy Framework (DPF) program and to view our certification, please visit https://www.dataprivacyframework.gov/.

Nu Skin is responsible for both the processing of Personal Data it has received and the subsequent transfers to a third party acting as an agent on its behalf. Nu Skin complies with the DPF Principles for all onward transfers of Personal Data from the EU, UK and Switzerland, including the onward transfer liability provisions. NSI shall remain liable under the DPF Principles if its subprocessors process personal data in a manner inconsistent with the DPF Principles.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, NSI commits to resolve DPF Principles-related complaints about our collection and use of personal data. EU, UK and Swiss individuals with inquires or complaints regarding how we process or handle the personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF or the Swiss-U.S. DPF are encouraged to first contact the NSI Privacy Office at privacyoffice@nuskin.com.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at https://feedback-form.truste.com/watchdog/request

EU, U.K. and Swiss individuals are also entitled to contact their local data protection authorities and/or the DPF Program here: Assistance Services (dataprivacyframework.gov).

With respect to Personal Data received or transferred pursuant to the Data Privacy Frameworks, Nu Skin is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Nu Skin has further committed to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner's Office (ICO), and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data.

Moreover, under certain conditions, individuals may invoke binding arbitration for complaints regarding DPF compliance not resolved by us or the DPAs Panel. Additional details about the binding arbitration can be found here: https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2.

### 8. How we protect your Personal Data

We protect your Personal Data and implement reasonable security measures including physical (e.g. secured filing cabinets), technical and organizational security measures appropriate to protect your Personal Data against unauthorized or unlawful processing and against any accidental loss, destruction, or damage.

In particular, we operate data networks protected by industry standard firewall and password protection systems. We also use transport layer security (TLS) to protect the transmission of your Personal Data. Access to this information will be provided only to authorized individuals for legitimate business purpose.

In addition, access to your Personal Data is restricted to staff and service providers on a need-to-know basis.

While we endeavor to always protect our systems, sites, operations and information against unauthorized access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others.

Please contact the Privacy Team if you have any questions about how we protect your Personal Data.

### 9. How long do we keep your Personal Data

We hold on to your Personal Data for as long as necessary to achieve the processing purposes described in our "List of Personal Data Processing Activities". This means, for instance, that we no longer store your Personal Data when our (contractual) relationship with you comes to an end, unless further storage is permitted or required under applicable law.

Generally, and while this will depend on several factors as outlined below, we do not keep your data for longer than 10 years. To determine the retention period of your Personal Data, we consider several criteria, including:

- The purpose for which we hold your Personal Data;
- Our legal and regulatory obligations in relation to that Personal Data, for example any financial reporting obligations;
- Whether our relationship with you is ongoing, for example, you have an active account, you continue to receive marketing communications, or you regularly browse or purchase off our Website or Apps);
- Any specific requests from you in relation to the deletion of your Personal Data; and
- Our legitimate interests in relation to managing our own rights, for example the defense of any claims.

When we no longer need to use your Personal Data, it is removed from our systems and records, or anonymized so that you can no longer be identified from it.

### 10. What are your rights regarding your Personal Data

Nu Skin values your privacy rights and is committed to providing you control over your Personal Data. If you exercise any of these rights explained in this section of the Privacy Notice, we will not disadvantage you. You will not be denied or charged different prices or rates for goods or services or provided a different level or quality of goods or services.

Generally, you have the following rights:

- Information. You have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Data, and your rights. This is why we are providing you with the information in this Privacy Notice;
- Rectification. You have the right to require that any incomplete or inaccurate Personal Data that we process about you is amended;
- Deletion. You have the right to request that we delete Personal Data that we process about you, subject to certain exceptions, for instance, where we need to keep your Personal Data to comply with a legal obligation;
- Withdrawing Consent. If you have consented to our processing of your Personal Data, you have the right to withdraw your consent at any time. This does not affect the lawfulness of the processing that was based on your consent prior to withdrawal. This includes cases where you wish to opt out from marketing messages that you receive from us;
- Access. Subject to certain exceptions, you have the right to access and request a copy of the Personal Data we are processing about you, which we will provide to you in electronic form and/or in writing, or verbally where allowed by applicable laws. Where permissible under applicable laws, we may charge you a reasonable fee for this access request;

In addition, if you are in the EEA or in Thailand you have the following rights:

• Restriction. You have the right to request that we restrict our processing of your Personal Data under specific conditions (also applicable if you are in Macau; in Korea, this right is known as the right to request the suspension of the processing of your Personal Data);

- Portability. You have the right to request that we transmit the Personal Data we hold in respect of you to you or to another data controller under specific conditions;
- Objection. Where the legal justification for our processing of your Personal Data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defense of a legal claim.

Where we process your Personal Data for direct marketing purposes, you have the right to object at any time to such processing, including for profiling purposes to the extent that it is related to direct marketing. If you object to processing for direct marketing purposes, we will no longer process your Personal Data for such purposes.

You can exercise the above rights, where applicable by contacting the Privacy Team or by using our online tool in the markets where such tool is available. California residents can also call the following toll-free number: 800-211-5200. We will respond to any of your requests to exercise these above data subject rights within the period prescribed by applicable laws. At our discretion, we may require you to prove your identity before providing the requested information. This is to ensure that your Personal Data is disclosed only to you. We may not be able to appropriately handle your request if you decide not to provide us with the Personal Data that we need to handle your request. If you are a resident of the European Economic Area and are not satisfied with the way we handled your request, or for violations of applicable data protection laws, you may lodge a complaint or file a claim with a competent Supervisory Authority (for example, with the Supervisory Authority in your country or market of residence).

### 11. Your marketing choices

You can control whether to receive direct marketing from us (e.g., which we may send through electronic means, such as promotional emails). In certain markets, you will need to provide us with your consent before receiving marketing. For instance, we may ask you to tick a box indicating to "receive promotional emails" when you sign up as a new customer or Brand Affiliate. In all markets, you can choose not to receive such communications at any time. If you no longer wish to receive any marketing communications or remain on a mailing list to which you previously subscribed, please follow the unsubscribe link in the relevant communication or contact the Privacy Team.

### 12. Your obligations

We expect that you only communicate Personal Data about yourself to us. If you also communicate Personal Data about other people to us, then you must ensure that you comply with any legal obligations that may apply to your provision of the information to us, and to allow us, where necessary, to use, process and transfer that information. In particular, and subject to local applicable laws as well as Nu Skin Policies & Procedures, if you use a credit card not issued to you, you confirm that the credit card holder has consented to the use of their credit card in relation to your purchase and has agreed that Nu Skin may collect, use and disclose their Personal Data for the purpose of processing your purchase.

We also expect that the Personal Data that you communicate to us are correct and that, if your Personal Data requires updating, you will promptly inform us.

### 13. Children

Nu Skin does not direct the sale of its products or services to children, nor does it allow its Brand Affiliates to be underage (under 18 in most markets, under 20 in Japan, and under 19 in Korea).

Nu Skin children's products can only be purchased by an adult. If you are a minor, you may use the Website only with the involvement of a parent or guardian.

Except in very limited circumstances (e.g. as part of our Corporate Social Responsibility activities), we do not knowingly collect or

otherwise process any Personal Data from children under the age of 13 and do not direct our services, Website or Apps to children under the age of 18. If you think that a child for which you are responsible provided Personal Data to us, we strongly encourage you to contact us immediately and we will work with you to find a solution to remediate this.

We encourage you to participate in your child's experience on the Internet and to review important safety tips with each child before they explore the Internet.

If you register your child to a Nu Skin event or incentive trip, we process your child's Personal Data for the purposes of attending the event or incentive trip. If the event requires processing of your child's special category data, we will request your explicit consent.

### 14. Changes to the Privacy Notice

We may update this Privacy Notice from time to time. We will notify you of any significant changes by posting those changes here or by notifying you through other appropriate communication channels we generally use with you. Any changes to this Privacy Notice will be considered effective immediately after the changes are posted on this Website unless otherwise indicated.

The Privacy Notice was last revised on January 30, 2024.

# Annex 1 – List of Nu Skin entities responsible for processing your Personal Data

The table below lists the relevant Nu Skin legal entities responsible for the processing of your Personal Data. Depending on your interactions with us and/or your location, one or more different Nu Skin entities might be responsible for such processing.

Please note that when fields have a gray background and no text, this means that we do not collect or otherwise process Personal Data for that data subject category in a given country/market.

Where a field includes more than one data controller, this means that we have more than one Nu Skin entity in that country/market and the controller responsible will be the entity that you have a relationship with (e.g. because you visited or applied with that specific Nu Skin office).

To find out which Nu Skin entity is the data controller responsible for your Personal Data, you need to determine:

1) In which category of data subject you fall:

- Customers, website visitors and app users (for the purpose of this section, a "customer" is anyone who purchases from Nu Skin directly, either on our Websites or Apps, or in our walk-incenters/stores; "customers" also include the recipients of the newsletter or other marketing communications)
- Brand Affiliates or Business Partners (*ie.* registered distributors)

- Job Candidates
- Office Visitors

### 2) Your country or market:

- If you are a Customer, look for the country/market in which you have registered your Nu Skin online account or make your purchases; if you visit our Websites or use our Apps, you will need to look for the Website or App country/market.
- If you are a Brand Affiliate, look for the country/market in which you have registered your Nu Skin Brand Affiliate account.
- If you are a Job Candidate, look for the country/market in which the Nu Skin office to which you apply for a job is located.
- If you are an Office Visitor, look for the country/market in which the Nu Skin office which you are visiting is located.

If you do not fall in one of the categories mentioned above, for instance because you do not have any, or no longer have a relationship with us, then Nu Skin International Inc. will be responsible for your Personal Data.

The last page of this Annex 1 contains the contact details of all entities listed herein. Please contact the <u>Privacy Team</u> if you have questions or concerns about this.

| Country/market | Customer   | Brand Affiliate/Business<br>Partners   | Job Candidate                             | Office visitor                            |
|----------------|--|--|---|---|
| Argentina      | Nu Skin International Inc. and<br>Nu Skin Argentina as joint<br>controllers                  | Nu Skin International Inc. and<br>Nu Skin Argentina as joint<br>controllers                  |   |   |
| Australia      | Nu Skin International Inc. and<br>Nu Skin Enterprises Australia,<br>Inc as joint controllers | Nu Skin International Inc. and<br>Nu Skin Enterprises Australia,<br>Inc as joint controllers | Nu Skin<br>Enterprises<br>Australia, Inc. | Nu Skin<br>Enterprises<br>Australia, Inc. |
| Austria        | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers             | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers             |   |   |
|                | Nu Skin International Inc. and   | Nu Skin Belgium NV and NSE   | Nu Skin Belgium                           | Nu Skin Belgium                           |

| Belgium             | NSE Products Europe BV as joint controllers   | Products Europe BV as joint controllers   | NV or NSE<br>Products Europe<br>BV | NV or NSE<br>Products Europe<br>BV |
|---------------------|---|---|------------------------------------|------------------------------------|
| Brunei              | Nu Skin International Inc. and<br>NuSkin Pharmanex (B) Sdn<br>Bhd as joint controllers        | Nu Skin International Inc. and<br>NuSkin Pharmanex (B) Sdn<br>Bhd as joint controllers              | NuSkin Pharmanex<br>(B) Sdn Bhd    | NuSkin Pharmanex<br>(B) Sdn Bhd    |
| Canada              | Nu Skin International Inc. and<br>Nu Skin Canada  | Nu Skin International Inc. and<br>Nu Skin Canada  |                                    |                                    |
| Chile               | Nu Skin International Inc. and<br>Nu Skin Chile   | Nu Skin International Inc. and<br>Nu Skin Chile   |                                    |                                    |
| Colombia            | Nu Skin International Inc. and<br>Nu Skin Colombia  | Nu Skin International Inc. and<br>Nu Skin Colombia  |                                    |                                    |
| Czech Rep           | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers              | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                    |                                    |                                    |
| Denmark             | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers              | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                    | Nu Skin<br>Scandinavia A/S         | Nu Skin<br>Scandinavia A/S         |
| Finland             | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers              | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                    |                                    |                                    |
| France              | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers              | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                    |                                    |                                    |
| French<br>Polynesia | Nu Skin International Inc., Nu<br>Skin Enterprises New Zealand,<br>Inc., as joint controllers | Nu Skin International Inc. and<br>Nu Skin Enterprises New<br>Zealand, Inc., as joint<br>controllers |                                    |                                    |
| Germany             | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers              | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                    | Nu Skin Germany<br>GmbH            | Nu Skin Germany<br>GmbH            |

| Hong<br>Kong/Macau | Nu Skin International Inc. and<br>Nu Skin Enterprises Hong<br>Kong, LLC as joint controllers      | Nu Skin International Inc. and<br>Nu Skin Enterprises Hong<br>Kong, LLC as joint controllers      | Nu Skin<br>Enterprises Hong<br>Kong, LLC                                   | Nu Skin<br>Enterprises Hong<br>Kong, LLC                                   |
|--------------------|---|---|--|--|
| Hungary            | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  | Nu Skin Eastern<br>Europe kft.   | Nu Skin Eastern<br>Europe kft.   |
| Iceland            | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  |  |  |
| Indonesia          | Nu Skin International Inc. and<br>PT Nusa Selaras Indonesia as<br>joint controllers               | Nu Skin International Inc. and<br>PT Nusa Selaras Indonesia as<br>joint controllers               | PT Nusa Selaras<br>Indonesia or PT Nu<br>Skin Distribution<br>Indonesia    | PT Nusa Selaras<br>Indonesia or PT Nu<br>Skin Distribution<br>Indonesia    |
| Ireland            | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  |  |  |
| Italy              | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  |  |  |
| Japan              | Nu Skin Enterprises Inc., Nu<br>Skin International Inc. and Nu<br>Skin Japan as joint controllers | Nu Skin Enterprises Inc., Nu<br>Skin International Inc. and Nu<br>Skin Japan as joint controllers | Nu Skin Japan  | Nu Skin Japan  |
| Luxembourg         | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                  |  |  |
|                    |   |   | Nu Skin (China)<br>Daily-Use & Health<br>Products Co., Ltd;                | Nu Skin (China)<br>Daily-Use & Health<br>Products Co., Ltd;                |
|                    |   |   | Shanghai Nu Skin<br>Chuang Xing Daily-<br>Use & Health<br>Products Co Ltd; | Shanghai Nu Skin<br>Chuang Xing Daily-<br>Use & Health<br>Products Co Ltd; |
|                    |   |   | Nu Skin Beauty<br>and Wellness Co.<br>Ltd;                                 | Nu Skin Beauty<br>and Wellness Co.<br>Ltd;                                 |
| Mainland China     | Nu Skin (China) Daily-Use & Health Products Co., Ltd  | Nu Skin (China) Daily-Use &<br>Health Products Co., Ltd   | Guangdong Xing<br>Chuang Daily- Use<br>& Health Products                   | Guangdong Xing<br>Chuang Daily- Use<br>& Health Products                   |

|               |   |   | Co Ltd;  | Co Ltd;  |
|---------------|---|---|--|--|
|               |   |   | Pharmanex<br>(Huzhou) Health<br>Products Co., Ltd.                       | Pharmanex<br>(Huzhou) Health<br>Products Co., Ltd.                       |
|               |   |   | Pharmanex<br>Electronic-Optical<br>Technology<br>(Shanghai) Co.,<br>Ltd. | Pharmanex<br>Electronic-Optical<br>Technology<br>(Shanghai) Co.,<br>Ltd. |
| Malaysia      | Nu Skin International Inc. and<br>Nu Skin (Malaysia) Sdn. Bhd<br>as joint controllers               | Nu Skin International Inc. and<br>Nu Skin (Malaysia) Sdn. Bhd<br>as joint controllers               | Nu Skin (Malaysia)<br>Sdn. Bhd   | Nu Skin (Malaysia)<br>Sdn. Bhd   |
| Mexico        | Nu Skin International Inc. and<br>Nu Skin Mexico as joint<br>controllers                            | Nu Skin International Inc. and<br>Nu Skin Mexico as joint<br>controllers                            | Nu Skin Mexico   | Nu Skin Mexico   |
| Netherlands   | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                    | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                    | Nu Skin<br>Netherlands BV  | Nu Skin<br>Netherlands BV  |
| New Caledonia | Nu Skin International Inc. and<br>Nu Skin Enterprises New<br>Zealand, Inc., as joint<br>controllers | Nu Skin International Inc. and<br>Nu Skin Enterprises New<br>Zealand, Inc., as joint<br>controllers |  |  |
| New Zealand   | Nu Skin International Inc. and<br>Nu Skin Enterprises New<br>Zealand, Inc as joint<br>controllers   | Nu Skin International Inc. and<br>Nu Skin Enterprises New<br>Zealand, Inc as joint<br>controllers   | Nu Skin<br>Enterprises New<br>Zealand, Inc.                              | Nu Skin<br>Enterprises New<br>Zealand, Inc.                              |
| Norway        | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                    | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                    |  |  |
| Peru          | Nu Skin International Inc. And<br>Nu Skin Peru S.A.C.   | Nu Skin International Inc. and<br>Nu Skin Peru S.A.C.   | Nu Skin Peru<br>S.A.C.   | Nu Skin Peru<br>S.A.C.   |
| Philippines   | Nu Skin International Inc. and<br>Nu Skin Enterprises<br>Philippines, LLC as joint<br>controllers   | Nu Skin International Inc. and<br>Nu Skin Enterprises<br>Philippines, LLC as joint<br>controllers   | Nu Skin<br>Enterprises<br>Philippines, LLC                               | Nu Skin<br>Enterprises<br>Philippines, LLC                               |
| Poland        | Nu Skin International Inc. and NSE Products Europe BV as  | Nu Skin International Inc. and NSE Products Europe BV as  |  |  |

|                   | joint controllers  | joint controllers  |   |   |
|-------------------|--|--|---|---|
| Romania           | Nu Skin International Inc. and<br>Nu Skin Enterprises SRL as<br>joint controllers                        | Nu Skin International Inc. and<br>Nu Skin Enterprises SRL as<br>joint controllers                        |   |   |
| Singapore         | Nu Skin International Inc. and<br>Nu Skin Enterprises Singapore<br>Pte Ltd as joint controllers          | Nu Skin International Inc. and<br>Nu Skin Enterprises Singapore<br>Pte Ltd as joint controllers          | Nu Skin<br>Enterprises<br>Singapore Pte. Ltd<br>or NSE Asia<br>Products Pte Ltd | Nu Skin<br>Enterprises<br>Singapore Pte. Ltd<br>or NSE Asia<br>Products Pte Ltd |
| Slovakia          | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         |   |   |
| South Africa      | Nu Skin International Inc. and<br>Nu Skin Enterprises South<br>Africa (PTY) Ltd. as joint<br>controllers | Nu Skin International Inc. and<br>Nu Skin Enterprises South<br>Africa (PTY) Ltd. as joint<br>controllers | Nu Skin<br>Enterprises South<br>Africa (PTY) Ltd.                               | Nu Skin<br>Enterprises South<br>Africa (PTY) Ltd.                               |
| Spain             | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         |   |   |
| Sweden            | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         |   |   |
| Switzerland       | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         |   |   |
| Taiwan            | Nu Skin International Inc. and<br>Nu Skin Taiwan, LLC, Taiwan<br>Branch as joint controllers             | Nu Skin International Inc. and<br>Nu Skin Taiwan, LLC, Taiwan<br>Branch as joint controllers             | Nu Skin Taiwan,<br>LLC, Taiwan<br>Branch  | Nu Skin Taiwan,<br>LLC, Taiwan<br>Branch  |
| Thailand          | Nu Skin International Inc. and<br>Nu Skin Enterprises (Thailand)<br>Limited as joint controllers         | Nu Skin International Inc. and<br>Nu Skin Enterprises (Thailand)<br>Limited as joint controllers         | Nu Skin<br>Enterprises<br>(Thailand) Limited                                    | Nu Skin<br>Enterprises<br>(Thailand) Limited                                    |
| Ukraine           | Nu Skin Enterprises Ukraine<br>LLC   | Nu Skin Enterprises Ukraine<br>LLC   | Nu Skin<br>Enterprises<br>Ukraine LLC   | Nu Skin<br>Enterprises<br>Ukraine LLC   |
| United<br>Kingdom | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         | Nu Skin International Inc. and<br>NSE Products Europe BV as<br>joint controllers                         |   |   |

| United States<br>of America | Nu Skin International Inc.     | Nu Skin International Inc.     | Nu Skin<br>International Inc. | Nu Skin<br>International Inc. |
|-----------------------------|--------------------------------|--------------------------------|-------------------------------|-------------------------------|
| Vietnam                     | Nu Skin International Inc. and | Nu Skin International Inc. and | Nu Skin                       | Nu Skin                       |
|                             | Nu Skin Enterprises Viet Nam   | Nu Skin Enterprises Viet Nam   | Enterprises Viet              | Enterprises Viet              |
|                             | Limited Liability Company as   | Limited Liability Company as   | Nam Limited                   | Nam Limited                   |
|                             | joint controllers              | joint controllers              | Liability Company             | Liability Company             |

| CONTACT INFORMATION  |   |  |  |
|--|---|--|--|
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|---|---|--|--|
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| Nu Skin International Inc.<br>75 West Center<br>Provo, UT 84601<br>UNITED STATES OF AMERICA<br>Tel: +1 800 487 1000   | Nu Skin (Malaysia) Sdn. Bhd<br>Lot 2.5.1, Level 2, PNB Perdana<br>(Commercial Centre),<br>No. 10, Jalan Binja<br>50450 Kuala Lumpur<br>MALAYSIA<br>Tel: +60 3 2170 7700<br><u>48hrs_reply_malaysia@nuskin.com</u>         | Nu Skin Netherlands BV<br>Amundsenweg 2<br>5928 LT Venlo<br>THE NETHERLANDS<br>Tel: +31 850 02 18 53<br>netherlandsweb@nuskin.com  | Nu Skin New Cal<br>Nu Skin Enterpris<br>Inc.<br>2/2 Eden Park Dr<br>Macquarie Park I<br>AUSTRALIA<br>Tel: +64 2 9491 (<br>pacifiquesud@nt              |
| NuSkin Pharmanex (B) Sdn Bhd(Nu Skin Brunei Experience Center)D2, Blk D, Lot 11620, Jalan GadongBE1718 Bandar Seri BegawanBRUNEI DARUSSALAMTel: +673 2 422 22548hrs_reply_brunei@nuskin.com | Nu Skin Scandinavia A/S<br>Augusthus, Amager Fælledvej 106<br>300 København S,<br>DENMARK<br>Tel: +45 78 73 06 02<br>neucustomerservice@nuskin.com  | <b>Branch</b><br>7F-1, No. 189, Section 2<br>Jiuzong Road<br>Neihu District<br>Taipei City, 114<br>TAIWAN<br>Tel: +886 02 8752 - 8555<br><u>nstwinfo@nuskin.com</u>                          | Pharmanex (Huz<br>Products Co., Ltt<br>No. 819-1, Xinzhı<br>Zhejiang,<br>PRC<br>48hrs_reply_chin   |
| <b>PT Nusa Selaras Indonesia</b><br>( <b>PT Nu Skin Distribution Indonesia</b> )<br>Jl. Jend Gatot Subroto 44 Kuningan<br>Barat<br>Area Gd. City Plaza<br>10th Fl., Suite 1001-1002         | <b>Shanghai Nu Skin Chuang Xing</b><br><b>Daily-Use &amp; Health Products Co Ltd</b><br>Room 408-2 and 408-6,<br>75 Tian Lin East Road,<br>Xuhui District, Shanghai,  | Pharmanex Electronic-Optical<br>Technology (Shanghai) Co., Ltd.<br>Room 206, Building T3-11, No.<br>5001 Huadong Road,<br>Jinqiao Export Processing Zone<br>(South District),                | Nu Skin Japan C<br>Tokyo Toranomo<br>14F,<br>1-3-1 Toranomor<br>Tokyo,   |

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|--|--|--|-------------------------------------|
| Nu Skin Peru S.A.C.<br>Av. Los conquistadores 1118<br>Interior 6<br>Urbanización Santa Cruz<br>San Isidro<br>PERU                      |  |  |                                     |

# Annex 2 - List of Personal Data Processing Activities

**Customer Account Creation and Management** 

#### In which context is your personal data collected?

Personal Data collected during the creation or management of a customer or member account on Nu Skin Website/Apps (including Vera), through a social media login or in store.

#### What personal data may we hold about you?\*

- Contact information: your name, title, address, email address or telephone number
- Account information: your ID/username, password, login activity
- **Product information**: your purchase history, details of products that we have sold to you, product returns, preferred products
- Social media profile: where you use your social media login or share this personal data with us
- **Biographical information**: your gender, birthdate, nationality, photograph, preferences, hobbies, interests

| How and why we may use it?   | What is our legal basis for processing your personal<br>data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|--|---|
| <ul><li>To:</li><li>create and manage your account</li></ul>   | The <b>performance of a contract:</b> so you can create and manage your account   |
| <ul> <li>maintain our global databases</li> <li>do research and development based on<br/>aggregate data, including but not limited to<br/>statistics about sales, market analysis,<br/>development of products and services</li> </ul> | Our <b>legitimate interests</b> : (i) to improve our products<br>and services; (ii) better engage with you; (iii) prevent<br>fraud or criminal activity; and (iv) secure our tools  |
| <ul> <li>offer personalised services based on your<br/>characteristics</li> </ul>  | Your <b>consent</b> : so you can receive personalised services from us  |

### **Brand Affiliate Account Creation and Management**

#### In which context is your personal data collected?

Personal Data collected during the creation or management of a Brand Affiliate account on Nu Skin Website/Apps (including Stela and Vera), through a social media login or in store.

#### What personal data may we hold about you?\*

- Contact information: your name, title, address, email address or telephone number
- Account information: your ID/username, password, login activity
- **Identification information**: your passport number, permanent resident identification number, social security number, or any other identification details or documents or photocopies of the aforesaid identification documents, to the extent permissible under applicable laws
- **Billing or financial information**: your bank account details, copy of bank account statement or any information or data required to verify and/or process payment transactions

- Tax information: your tax ID number such as a VAT number, tax identification number or similar
- Social media profile: where you use your social media login or share this personal data with us
- **Biographical information**: your gender, birthdate, nationality, photograph, preferences, hobbies, interests

| How and why we may use it?   | What is our legal basis for processing your personal data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein   |
|--|--|
| <ul> <li>To:</li> <li>create and manage your account</li> <li>process your commission and bonus payments</li> <li>allow you to manage your preferences</li> </ul>  | The <b>performance of a contract</b> : so you can create<br>and manage your account<br>To <b>comply with a legal obligation</b> : to request and<br>keep information we are required to by law (for<br>instance, we may be required by law to ask for an<br>official identification number/document) |
| <ul> <li>do research and development based on<br/>aggregate data, including but not limited to<br/>statistics about sales, market analysis,<br/>development of products and services</li> <li>maintain our global databases</li> </ul>   | Our <b>legitimate interests</b> : (i) to improve our products<br>and services; (ii) better engage with you; (iii) prevent<br>fraud or criminal activity; and (iv) secure our tools   |
| <ul> <li>give recognition to you as a Brand Affiliate, for instance by publishing your name, sales records, picture, pin title, charitable donations you made, etc., at Nu Skin events, in Business Support Materials, on our website and social media channels, via email, onsite at Nu Skin, etc.</li> <li>promote our brand, for instance by using on the Website, in marketing materials or in other marketing tools, (i) testimonials given by you during Nu Skin's events, or (ii) recordings or images of your appearances and/or performances at Nu Skin's events</li> <li>offer personalised services based on your characteristics, for instance, (i) sharing information in Nu Skin's Business Support Materials, (ii) inviting you to events and sending reminders on events, venue, date and time, and (iii) organizing success trips and events</li> </ul> | Your <b>consent</b> : so we can give you recognition as a<br>Brand Affiliate and/or offer you personalized<br>services and promote our brand   |

#### Purchases and Order Management

#### In which context is your personal data collected?

Personal Data collected during the purchase process made on Nu Skin Website/Apps (including Stela and Vera), in store or through the phone.

#### What personal data may we hold about you?\*

- Contact information: your name, title, address, email address or telephone number
- **Billing or financial information**: bank account details, credit/debit card details, or any information or data required to verify and/or process payment transactions
- **Product information**: your purchase history, details of products you purchased, product returns, preferred products

| How and why we may use it?   | What is our legal basis for processing your personal data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|--|--|
| <ul> <li>To:</li> <li>Process your order including delivering the product to the address you indicated</li> <li>Manage payment</li> <li>Manage any contact you have with us about your order</li> <li>Manage any dispute relating to a purchase</li> </ul> | The <b>performance of a contract</b> : so you can make purchases and we can manage the associated logistics  |
| <ul> <li>Manage any dispute relating to a purchase</li> <li>Contact you about your order, including to provide you with information regarding the shipping and delivery status of your order</li> </ul>  |  |
| <ul> <li>Keep records of our product sales to our<br/>customers</li> </ul>   | To <b>comply with a legal obligation</b> : to request and keep information we are required to by law (for instance, for tax purposes)  |
|  |  |

| <ul> <li>Contact you to finalise your order where you have saved your shopping cart or placed products in your cart without completing the checkout process</li> <li>Secure your transactions against fraud</li> <li>If you place a purchase using a registered account, we will add this transaction to your profile so we can understand your interests and preferences and you will see a record of your transactions with us within your account (where applicable)</li> <li>Do research and development based on aggregate data, including but not limited to statistics about sales, market analysis, development of products and services</li> <li>Train AI models and improve machine learning for Nu Skin products and services</li> </ul> | Our <b>legitimate interests</b> : (i) to improve our products<br>and services; (ii) better engage with you; (iii) prevent<br>fraud or criminal activity; and (iv) secure our tools; or<br>your <b>explicit consent</b> where required by law |
|---|--|
| <ul> <li>Inform you when a product you wanted to<br/>purchase is available</li> </ul>   | Your <b>consent</b> : so you can be informed of product availability   |

### **Newsletter and Marketing Subscription**

#### In which context is your personal data collected?

Personal Data collected when you subscribe to receive our marketing communications either via email or SMS.

#### What personal data may we hold about you?\*

*\*the following lists of data elements are intended to provide key examples and not necessarily be exhaustive in nature* 

• Contact information: your name, email address or telephone number

What is our legal basis for processing your personal<br/>data?\*How and why we may use it?\*in those markets in which a "legitimate interest" is<br/>not a valid legal basis, we will rely on your consent to<br/>process your personal information as described<br/>herein

| <ul> <li>Send you email and/or SMS marketing<br/>communications (where you have asked us<br/>to) which may be tailored to your "profile"<br/>based on the personal data we know or<br/>learn about you and your preferences</li> </ul> | Your <b>consent:</b> so you can receive marketing communications from us  |
|--|---|
| <ul> <li>Keep an up to date suppression list if you<br/>have asked not to be contacted; and/or</li> </ul>  | To <b>comply with a legal obligation</b> : to request and keep information we are required to by law (maintain suppression lists) |
| Run analytics or collect statistics  | Our <b>legitimate interests</b> : (i) to improve our products and services; and (ii) better engage with you                       |

### **Event and Incentive Trip Registration and Participation**

#### In which context is your personal data collected?

Personal Data collected during the registration phase to an Event or an incentive trip, or during your participation at such an event or trip.

#### What personal data may we hold about you?\*

\*the following lists of data elements are intended to provide key examples and not necessarily be exhaustive in nature

- Contact information: your name, title, address, email address or telephone number
- **Biographical information**: your gender, birthdate, nationality, marital status, photograph or videos containing your image, information about family life (including family, children, hobbies or interests)
- Identification information: your passport number or national ID number, permanent resident identification number, details or documents or photocopies of the aforesaid identification documents, to the extent permissible under applicable laws
- **Registration data**: event/incentive trips registrations, subscriptions, downloads, or username/passwords, data requested in sign-up or registration forms, or related information such as feedback or survey responses
- Billing or financial information: your bank account details, credit/debit cards details
- Health-related data: your allergies, medical condition or other ailments
- **Technical information**: your IP address, browser information, or device information (when you attend an Event remotely)

What is our legal basis for processing your personal data?\*

| How and why we may use it?   | <i>*in those markets in which a "legitimate interest" is<br/>not a valid legal basis, we will rely on your consent to<br/>process your personal information as described<br/>herein</i> |
|--|---|
| <ul> <li>To:</li> <li>verify your eligibility to participate in an Event or Incentive Trip</li> <li>register your participation in an Event or Incentive Trip</li> <li>make the necessary travel and other booking arrangements</li> <li>send you relevant information about the Event or Incentive Trip and notify you about changes to these</li> <li>authenticate your identity when you attempt to gain access to and attend an Event, whether physically or remotely</li> </ul> | The <b>performance of a contract</b> : to confirm and make<br>your booking, registration and other travel<br>arrangements   |
| <ul> <li>offer you a customized experience that suits your needs and requirements (incl. dietary requirements)</li> <li>enable you to partake in a prize drawing or competition or to complete a survey</li> <li>add your participation to your profile so we can understand your interests and preferences</li> </ul>   | Your <b>consent</b> : where we ask you to leave a review or<br>take a survey or provide health- related data, or<br>where you want to receive a customized experience                   |
| <ul> <li>promote our brand, for instance by using on<br/>the Website, in marketing materials or in<br/>other marketing tools, (i) testimonials given<br/>by you during Nu Skin's Events or Incentive<br/>Trips, or (ii) recordings or images of your<br/>appearances and/or performances at Nu<br/>Skin's Events or Incentive Trips</li> </ul>   | Our <b>legitimate interests</b> : (i) to improve our products and services; and (ii) better engage with you   |

## Adverse Event/Product Complaint Reporting

#### In which context is your personal data collected?

Personal Data collected when you report online or on the phone (i) an adverse event that occurred from your use of our products or (ii) a complaint regarding our products.

#### What personal data may we hold about you?\*

\*the following lists of data elements are intended to provide key examples and not necessarily be exhaustive in nature

- Contact information: your name, title, address, email address or telephone number
- Health-related information: data related to your health or medical history as required for processing the adverse event or the product complaint if such information is relevant to evaluate, classify or assess the product complaint
- Other information you have shared with us about yourself in relation to your enquiry (which may include welfare, health data or call recordings)

| How and why we may use it?   | What is our legal basis for processing your personal data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|--|--|
| <ul> <li>To:</li> <li>prevent, monitor and manage adverse events</li> <li>evaluate, classify and assess the adverse event and/or product complaint</li> <li>maintain the information in a product complaints database for reference</li> </ul> | To <b>comply with a legal obligation:</b> to keep information we are required to and/or to meet health and safety requirements   |
| • follow up on such reports and/or complaints  | The <b>performance of a contract</b> : to provide you with the service you have requested, for example, so we can offer a compensation   |

### Online Browsing and Use of our Apps

#### In which context is your personal data collected?

Personal Data collected by cookies or similar technologies when you browse Nu Skin Website/Apps (including Stela and Vera) or on third-party website/apps where we have cookies, pixels or other similar technologies.

#### What personal data may we hold about you?\*

- Technical information: your IP address, browser information, or device information;
- Website usage information: data related to your use of our Website or Apps including where you came from, login details, location, data related to your navigation on our Website/Apps (incl. scroll/mouse movement, but in a manner that does not identify you), pages/ content you looked at, clicked or tapped on, duration of your visit; and/or products you searched for and/or selected

| How and why we may use it?   | What is our legal basis for processing your personal<br>data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|--|---|
| <ul> <li>To:</li> <li>maintain security and manage access to our systems, Website and Apps;</li> <li>collect insights into how you interact with our services so that we can personalize our communications with you and improve our Website and Apps;</li> <li>measure the effectiveness of our services and collect information to improve our products and services;</li> <li>ensure your data security is maintained, and our systems kept up to date to continue servicing you</li> <li>allow proper functioning of our Website and Apps</li> </ul> | Our <b>legitimate interests</b> : (i) to improve our products and services; (ii) better engage with you; (iii) prevent fraud or criminal activity; and (iv) secure our tools.   |
| <ul> <li>tailor our services for you, that is to show you recommendations, marketing, or content based on your profile and interests; and/or display our websites in a tailored way, for example, show you products we think you might like</li> <li>deliver targeted advertising (e.g. online advertisements for products which may be of interest to you, based on your previous behaviour; and/or ads and content on social media platforms or other websites) <i>Read our Cookies policy for more information</i></li> </ul>                         | Your <b>consent</b> : to store cookies, pixels or other similar<br>technologies on your device  |

### **Social Media Platforms**

#### In which context is your personal data collected?

Personal Data collected from your activity on social media platforms.

#### What personal data may we hold about you?\*

*\*the following lists of data elements are intended to provide key examples and not necessarily be* 

#### exhaustive in nature

We may get **information you publicly post on social media** platforms or use it to better understand how customers view our products/services or interact with us. For example, we may use public posts to identify beauty trends. Where possible, we do this in way that we are unable to directly identify you. We may also collect your personal data when you mention us on social media platforms. The personal data we collect may include:

- Social media handle;
- Photo; and/or
- Any comments mentioned in your post.

If we want to re-use any content you post on social media platforms, we will always ask your permission first (see 'User Generated Content' below).

| How and why we may use it?  | What is our legal basis for processing your personal data?*<br>*in those markets in which a "legitimate interest" is not a valid legal basis, we will rely on your consent to process your personal information as described herein |
|---|---|
| <ul><li>To:</li><li>Monitor and improve our websites and apps</li><li>Run analytics or collect statistics</li></ul> | Our <b>legitimate interests</b> : (i) to improve our products and services; and (ii) better engage with you   |

### **User Generated Content**

#### In which context is your personal data collected?

Personal Data collected when you submit content (for example images or testimonials) on one of our Website/Apps/social media platforms or accept our re-use of any content you posted on social media platforms.

#### What personal data may we hold about you?\*

*\*the following lists of data elements are intended to provide key examples and not necessarily be exhaustive in nature* 

• Contact information: your name or alias, email address or telephone number;

- **Biographical information**: your gender, photograph or videos containing your image, personal description or preferences, information about family life (including family, children, hobbies or interests);
- Social media profile: where you use your social media login or share this personal data with us.

| How and why we may use it?  | What is our legal basis for processing your personal<br>data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|---|---|
| <ul> <li>Use the content you have created and/or shared in accordance with the specific terms and conditions accepted by you e.g. to post your review/content and to promote our products;</li> </ul> | <b>Your consent:</b> to provide you with the service you have requested, for example, so you can upload the content of your choice  |
| <ul> <li>Add your content to your profile so we can understand<br/>your interests and preferences; and/or</li> <li>Run analytics and statistics.</li> </ul>   | Our <b>legitimate interests</b> : (i) to improve our products and services; (ii) better engage with you; (iii) prevent fraud or criminal activity; and (iv) secure our tools  |

### Enquiries

### In which context is your personal data collected?

Personal Data collected when you reach out to customer service or account management to ask questions relating to our products and their use, or your purchases, account or rights.

### What personal data may we hold about you?\*

\*the following lists of data elements are intended to provide key examples and not necessarily be

exhaustive in nature

- Contact information: your name, title, address, email address or telephone number;
- Other information you have shared with us about yourself in relation to your enquiry (which may include welfare, health data or call recordings).

|                            | What is our legal basis for processing your personal data?*  |
|----------------------------|--|
| How and why we may use it? | <i>*in those markets in which a "legitimate interest" is<br/>not a valid legal basis, we will rely on your consent to<br/>process your personal information as described</i> |

|  | herein   |
|--|--|
| To:<br>• Answer and manage your enquiries  | The <b>performance of a contract:</b> to respond to your enquiries.  |
| <ul> <li>Run analytics and statistics</li> <li>Add your questions or concerns to your profile so we can understand your interests and preferences</li> </ul> | Our <b>legitimate interests</b> : (i) to improve our products and services; (ii) better engage with you; (iii) prevent fraud or criminal activity; and (iv) secure our tools |

### Surveys, Panel Discussions and Focus Groups

#### In which context is your personal data collected?

Personal Data collected when you participate and complete a survey, or particate in a panel discussion or focus group

#### What personal data may we hold about you?\*

# *\*the following lists of data elements are intended to provide key examples and not necessarily be exhaustive in nature*

exhaustive in hature

- Contact information: your name, title, address, email address or telephone number
- Biographical information: your gender, birthdate, nationality
- Other information you have shared with us about yourself in relation to the survey, panel discussion or focus group (which may include sensitive personal information such as data relating to race or ethnic origin, religious or philosophical beliefs, medical or health conditions)
- Technical information and Website usage information (see section regarding "Online browsing and use of our Apps" where the surveys are carried out online)

| How and why we may use it?  | What is our legal basis for processing your personal data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|---|--|
| <ul> <li>To:</li> <li>achieve the objectives further described in the surveys, panel discussions or focus groups including but not limited to improving our product and services</li> </ul> | Your <b>consent</b> : where you agree to participate to the survey, panel discussion or focus group and answer the questions   |
|   |  |

### **Our Premises**

#### In which context is your personal data collected?

Personal Data collected when you visit our premises e.g. our offices or walk-in- centers (live centers, experience centers, etc).

#### What personal data may we hold about you?\*

*\*the following lists of data elements are intended to provide key examples and not necessarily be exhaustive in nature* 

- CCTV footage;
- Attendance/visitor forms (which may include the collection of identification data or contact information, as well as welfare or health data).

| How and why we may use it?   | What is our legal basis for processing your personal<br>data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|--|---|
| <ul> <li>Assist in the prevention and detection of crime and manage enquiries</li> <li>Help ensure the safety and security of information located or stored within the premises, and assets</li> </ul> | Our <b>legitimate interests</b> : (i) prevent fraud and criminal activity;<br>and (ii) secure our tools   |
| <ul> <li>Help ensure the health, safety and security of<br/>employees and visitors</li> </ul>  | To <b>comply with legal obligation</b> : to meet health and safety requirements.  |

### **Job Application**

#### In which context is your personal data collected?

Personal Data collected as part of your application for a job at Nu Skin

#### What personal data may we hold about you?\*

- Contact information: your name, title, address, email address or telephone number
- **Biographical information**: your gender, birthdate, nationality, photograph, preferences, hobbies, interests, family situation, civil status
- Educational background information: your academic titles, diplomas, schools, or universities attended, skills or merits related
- **Professional records information**: your professional experience, duration of previous job contracts, previous position titles, practice areas, assessments established by your previous employers
- Any additional information contained in your application or in your self-recorded videos (e.g., sound or images)

| How and why we may use it?  | What is our legal basis for processing your personal data?*<br>*in those markets in which a "legitimate interest" is not a valid legal basis, we will rely on your consent to process your personal information as described herein |
|---|---|
| <ul> <li>To:</li> <li>complete, fulfil and process your application, including any subsequent stages of the recruitment process</li> <li>communicate with you and to provide you with any service related to your application</li> <li>fulfil identity verifications</li> <li>respond to your inquiries and support needs and to fulfil or comply with any other request you may have allow you to manage your application</li> </ul> | The <b>performance of a contract</b> : to respond and process your application to one of our job offers   |
| <ul> <li>conduct background checks, in accordance with local laws</li> <li>consider and contact you should a relevant position arise in the near future</li> </ul>  | Our <b>legitimate interests</b> : find the best candidates for our job offers   |

### **Vera Skin Consultation**

#### In which context is your personal data collected?

Personal Data collected as part of your use of our virtual Vera Skin Consultation service.

#### What personal data may we hold about you?\*

- Contact information: your name or email address
- Biographical information: your gender, age range, location or photograph

- Lifestyle information: your skin routine, sleeping habits, or water intake
- Health-related information: your skin sensitivity, skin type or skin concerns
- Ethnicity-related information: your Ethnic origin
- Tracking metrics: the stage of your consultation, or whether you have added a product to your cart or purchased it
- Customer insights: the results of your product recommendations or what features of the app are being used

| How and why we may use it?  | What is our legal basis for processing your personal data?*<br>*in those markets in which a "legitimate interest" is not a valid legal basis, we will rely on your consent to process your personal information as described herein          |
|---|--|
| <ul> <li>To:</li> <li>provide you with a tailored skin care routine, and product recommendations, that meet your needs, through the use of algorithms and artificial intelligence</li> <li>enable you to keep track of your recommendations over time</li> <li>improve our products and services</li> <li>facilitate sharing product information, product recommendations, or user experience to your social networks if you choose to</li> </ul> | The <b>performance of a contract</b> : to provide you with the service<br>you have requested, for example, so you can receive the product<br>recommendation;   |
| • facilitate sharing your results and product recommendations with your sponsor (if you are a customer) or other Brand Affiliates   | Your <b>explicit consent</b> : to the extent that we process special category data or share your data with your sponsor/Brand Affiliates   |
| <ul> <li>do research and development based on aggregate data, including but not limited to statistics about sales, market analysis, development of products and services</li> <li>improve our products and services, including training AI models and improving machine learning for Nu Skin products and services</li> </ul>   | Our <b>legitimate interests</b> : (i) to improve our products and<br>services; (ii) better engage with you; (iii) prevent fraud or criminal<br>activity; and (iv) secure our tools;<br>or your <b>explicit consent</b> where required by law |

### Vera Shade Finder

#### In which context is your personal data collected?

Personal Data collected as part of your use of our virtual Vera Shade Finder service.

#### What personal data may we hold about you?\*

#### exhaustive in nature

- Biographical information: your gender, age range, location or photograph;
- Ethnicity-related information: your Ethnic origin

| How and why we may use it?   | What is our legal basis for processing your personal data?*<br>*in those markets in which a "legitimate interest" is not a valid legal basis, we will rely on your consent to process your personal information as described herein |
|--|---|
| То:  |   |
| <ul> <li>provide you with product recommendations that meet your needs, through the use of algorithms and artificial intelligence</li> <li>enable you to keep track of your recommendations over time</li> </ul> | The <b>performance of a contract</b> : to provide you with the service<br>you have requested, for example, so you can receive the product<br>recommendation;  |
| <ul> <li>facilitate sharing product information, custom<br/>recommendations, or user experience to your social<br/>networks if you choose to</li> </ul>  | Your <b>consent</b> : so you can share your photos or product information on your social networks   |
| <ul> <li>improve our products and services, including training<br/>Al models and improving machine learning for Nu Skin<br/>products and services</li> </ul>   | Our <b>legitimate interests</b> : (i) to improve our products and services; (ii) better engage with you; (iii) prevent fraud or criminal activity; and (iv) secure our tools  |

### Vera Selfie Timeline

#### In which context is your personal data collected?

Personal Data collected as part of your use of our virtual Vera Selfie Timeline service.

#### What personal data may we hold about you?\*

*\*the following lists of data elements are intended to provide key examples and not necessarily be exhaustive in nature* 

• Biographical information: your gender, age range, location or photograph;

What is our legal basis for processing your personal data?\*

| How and why we may use it?   | <i>*in those markets in which a "legitimate interest" is<br/>not a valid legal basis, we will rely on your consent to<br/>process your personal information as described<br/>herein</i>   |
|--|---|
| To:<br>• enable you to keep track of your evolution or progress<br>over time   | The <b>performance of a contract</b> : to accede to your request to use the Vera Selfie Timeline  |
| <ul> <li>facilitate sharing before and after photos if you choose to</li> <li>facilitate sharing product information, custom recommendations, or user experience to your social networks if you choose to</li> </ul> | Your <b>consent</b> : so you can share your photos on your social networks  |
| <ul> <li>improve our products and services, including training<br/>Al models and improving machine learning for Nu Skin<br/>products and services.</li> </ul>  | Our <b>legitimate interests</b> : (i) to improve our products and services; (ii) better engage with you; (iii) prevent fraud or criminal activity; and (iv) secure our tools; or your <b>explicit consent</b> where required by law |

### Vera Device Management

#### In which context is your personal data collected?

Personal Data collected as part of your use of our virtual device management services (for example Vera LumiSpa iO service).

#### What personal data may we hold about you?\*

*\*the following lists of data elements are intended to provide key examples and not necessarily be exhaustive in nature* 

- Tracking metrics: your usage of our services, routine logs, and routine history
- Customer insights: the results of your routines and interactions with our services
- Device information: paired usage logs, device management, events (e.g. device drop), warranty details

|                            | What is our legal basis for processing your personal data?*   |
|----------------------------|---|
| How and why we may use it? | <i>*in those markets in which a "legitimate interest" is<br/>not a valid legal basis, we will rely on your consent to<br/>process your personal information as described<br/>herein</i> |
| To:                        |   |

• provide you with customized routines and insights that meet your needs, through the use of algorithms and

| <ul> <li>artificial intelligence</li> <li>enable you to keep track of your usage over time</li> <li>improve our products and services</li> <li>facilitate sharing before and after photos if you choose to</li> <li>facilitate sharing product information, custom routines, or user experience to your social networks if you choose to</li> </ul> | The <b>performance of a contract</b> : to provide you with the service<br>you have requested, for example, so you can receive the product<br>recommendations, track usage, and customized routines   |
|---|--|
| <ul> <li>facilitate sharing your results and product<br/>recommendations with your sponsor (if you are a<br/>customer) or other Brand Affiliates</li> </ul>   | Your <b>explicit consent</b> : to the extent that we process special category data or share your data with your sponsor/Brand Affiliates   |
| <ul> <li>do research and development based on aggregate data, including but not limited to statistics about sales, market analysis, development of products and services</li> <li>improve our products and services, including training AI models and improving machine learning for Nu Skin products and services</li> </ul>                       | Our <b>legitimate interests</b> : (i) to improve our products and<br>services; (ii) better engage with you; (iii) prevent fraud or criminal<br>activity; and (iv) secure our tools; or your <b>explicit consent</b> where<br>required by law |

### **Nu Skin Connect**

#### In which context is your personal data collected?

Personal Data collected as part of your use of the Nu Skin Connect customer resource management tool.

#### What personal data may we hold about you?\*

- Contact information: your name, title, address, email address or telephone number;
- **Biographical information**: your gender, birthdate, photograph or videos containing your image, preferences, hobbies, interests;
- Social media profile: where you use your social media login or share this personal data with us;
- Usage Information: your activity or transaction history (device used to log in, the time of day, the time spent on the app, location, actions completed or IP address);
- **Product information**: your purchase history, details of products that we have sold to you, product returns, preferred products;
- Location Information: your location Information, that includes GPS data from devices or a rough estimate of location from IP Addresses.

| How and why we may use it?  | What is our legal basis for processing your personal<br>data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|---|---|
| <ul> <li>To:</li> <li>verify you have the authorization needed for the use of Nu Skin Connect</li> <li>provide Nu Skin Connect to you and allow your use of Nu Skin Connect</li> </ul>  | The <b>performance of a contract</b> : to provide you with the service you have requested   |
| <ul> <li>monitor and analyze your use of Nu Skin Connect, including how you use and share marketing content created by Nu Skin, as well as the messages sent through Nu Skin Connect in order to ensure the conformity of such messages with our Policies and Procedures (Nu Skin does not have access to the content of your messages and only searches for the use of prohibited terms)</li> <li>enable Nu Skin Connect's technical administration, including the improvement of Nu Skin Connect's functionality and user-friendliness</li> <li>do research and development based on aggregate data, including but not limited to statistics about sales, market analysis, development of products and services;</li> </ul> | Our <b>legitimate interests</b> : (i) to improve our products and<br>services; (ii) better engage with you; (iii) prevent fraud or criminal<br>activity; and (iv) secure our tools  |

### **Enjoy Rewards and Other Loyalty Programs**

#### In which context is your personal data collected?

Personal Data collected as part of your participation in the enJoy Rewards Program.

#### What personal data may we hold about you?\*

- Contact information: your name, title, address, email address or telephone number;
- **Product information**: your purchase history, details of products that we have sold to you, product returns, preferred products;
- Customer insights: the results of your participation, point redemption, or involvement in the rewards program;
- Tracking metrics: the tier of your participation, loyalty, or whether you have achieved certain status.

| How and why we may use it?   | What is our legal basis for processing your personal<br>data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|--|---|
| <ul> <li>To:</li> <li>offer and manage our loyalty programs and provide you with enJoy Rewards benefits</li> </ul>                                       | The <b>performance of a contract</b> : to accede to your request to join the enJoy Rewards Program  |
| <ul> <li>run analytics and statistics</li> <li>add your participation to your profile so we can<br/>understand your interests and preferences</li> </ul> | Our <b>legitimate interests</b> : (i) to improve our products and services; (ii) better engage with you; (iii) prevent fraud or criminal activity; and (iv) secure our tools.   |

### **TR90 Challenge**

#### In which context is your personal data collected?

Personal Data collected as part of your participation in our TR90 challenge.

#### What personal data may we hold about you?\*

- Contact information: your name, title, address, email address, telephone number, nuskin ID
- Biographical information: your gender, birthdate, voice and portrait
- Health-related information: your lifestyle, diet, daily exercise, height, weight, body fat percentage

| How and why we may use it?  | What is our legal basis for processing your personal<br>data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein |
|---|---|
| <ul> <li>To:</li> <li>verify you have the authorization needed for your participation to the TR90 challenge</li> <li>allow registration to participate in the TR90 challenge</li> <li>enable you to use the features of the TR90 Challenge app</li> </ul> | The <b>performance of a contract</b> : to accede to your request to participate in the TR90 challenge   |

| <ul> <li>enable you to use the reservation function for<br/>measuring the TR90 challenge</li> <li>allow the TR90 challenge app to provide weight<br/>maintenance related services</li> </ul> | Your <b>consent</b> : to provide you with the service you have requested, for example, so you can upload the content of your choice  |
|--|--|
| • monitor and analyze your use of TR90 challenge   | Our <b>legitimate interests</b> : (i) to improve our products and services; (ii) better engage with you; (iii) prevent fraud or criminal activity; and (iv) secure our tools |

### **IoT Devices**

#### In which context is your personal data collected?

Personal Data collected as part of your usage of our IoT connected devices (for example ageLoc LumiSpa iO device).

#### What personal data may we hold about you?\*

*\*the following lists of data elements are intended to provide key examples and not necessarily be exhaustive in nature* 

• Device information: usage logs, device management, events (e.g. device drop), warranty details

| How and why we may use it?   | What is our legal basis for processing your personal<br>data?*<br>*in those markets in which a "legitimate interest" is<br>not a valid legal basis, we will rely on your consent to<br>process your personal information as described<br>herein   |
|--|---|
| <ul> <li>To:</li> <li>do research and development based on aggregate data, including but not limited to statistics about market analysis, development of products and services;</li> <li>fulfill warranty obligations</li> </ul> | Our <b>legitimate interests</b> : (i) to improve our products and<br>services; (ii) better engage with you; (iii) prevent fraud or criminal<br>activity; and (iv) secure our tools<br>The <b>performance of a contract</b> : to provide you with the service<br>you have requested in line with your purchase |
| • enable user experience within our apps   | Your <b>consent</b> : to provide you with the service you have requested, for example, to pair your device  |