

Data Protection information policy for work relations

Version 2.3, valid from 7 January 2025

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1. Who processes your personal data?

The following entity/entities is/are 'joint controller(s)' for the processing of your personal data:

Joint Controller 1: NSE Products Europe BVBA, with registered office at 9 Da Vincilaan, The Corporate Village, Building Elsinore, 1930 Zaventem, Belgium, company number 0642 635 688.

Joint Controller 2: Collectively, Nu Skin International Inc., Nu Skin Enterprises, Inc., Nu Skin Enterprises United States, Inc. and NSE Products, Inc., all with registered office at 75 West Center Street Provo, UT 84601, United States of America, entity number 880564-0142.

The joint controllers referred to above as "**Company**".

2. What is this policy about?

This policy applies to the personal data that the Company processes about you in your work relationship with

the Company regardless of the contractual basis upon which you work for the Company, including but not limited to employee, freelancer, intern, interim, job student, etc.

3. Which personal data does the Company process?

The personal data that the Company processes, are:

- Normal personal data
- Personal contact and identification data
- Employment and education history
- Leisure activities and interests
- Salary and benefits information
- Family composition
- Job performance information
- Information on position, absence and leave
- Information about your use of Company resources
- Administrative information such as your bank account number
- Travel reimbursement information
- Pictures, images and video (including photos and video from company events and for promotional activities specifically including in particular of Sales and Marketing employees as part of their work assignment)
- National identification number or identifier of general application, such as rijksregisternummer/numéro de registre national

The data described above is either provided directly by you to the Company, or indirectly via:

- Recruitment agencies
- Interim companies

You ensure that all necessary personal data are fully and accurately communicated to the Company, and you will always immediately inform the human resources department in writing whenever your personal data changes. The Company is not liable for wrongly applying social and fiscal legislation due to your negligence in providing accurate and up to date personal data. Please see Section 9 for more information on how to ensure that your data is accurate and up-to-date.

4. Why does the Company process your personal data?

The Company processes your personal data for the following purposes and based upon the following processing grounds:

Purpose	Examples of processing operations	Processing ground*	Controllers	Comment
Administration of workforce	Employee payroll, administration of freelancers, organisation of social elections	C, D, H, N	1	
Management of workforce	Evaluation and appraisal, group-wide contact database, group-wide management of workforce, monitoring of electronic communications, video surveillance	G	1, 2	G: Legitimate interests of the Company and its stakeholders (employees, customers, suppliers, shareholders, associated companies etc.): the management of workforce and the exercise of authority as employer contribute to safeguarding and promoting the economic, commercial, social and financial interests of the Company.
Unlawful activities and dispute management	Detection, prevention and sanctioning of unlawful activities including fraud, handling of traffic infringements, establishment/exercise/defense of legal claims, monitoring of electronic communications,	D, G, L	1, 2	G: Legitimate interests of the Company and its stakeholders (employees, customers, suppliers, shareholders, associated companies etc.): the detection, prevention and

	video surveillance			sanctioning of unlawful activities and the management of disputes contribute to safeguarding and promoting the economic, commercial, social and financial interests of the Company.
PR and marketing	External and internal communication	A, G	1, 2	<p>G: For marketing and Sales Employees: Legitimate interests of the Company and its stakeholders (employees, customers, suppliers, shareholders, associated companies etc.): appropriate external and internal communication contributes to safeguarding and promoting the economic, commercial, social and financial interests of the Company.</p> <p>A: For other employees: where we have your consent to process your photos, images, videos and/or records.</p>
Scientific research	Statistics about the workforce	G	1, 2	G: Legitimate interests of the Company and its stakeholders

				(employees, customers, suppliers, shareholders, associated companies etc.): research and development can lead to enhance employee well-being and customer experience, and to product improvement and innovation, which is beneficial for the Company and all its stakeholders.
M&A	Processing of personal data in the framework of sale of the shares or assets of the Company	G	1, 2	G: Legitimate interests of the Company and its stakeholders (employees, customers, suppliers, shareholders, associated companies etc.): M&A can contribute to the development and continuity of the Company, which is beneficial for the Company and all its stakeholders.

* Legend of processing grounds:

Processing ground for all types of personal data	
A	Your consent
Processing grounds for normal personal data	

B	The need to take steps at the request of the data subject prior to entering into a contract
C	The need to perform a contract to which you are party
D	The need to comply with a legal obligation to which the Company is subject
E	The need to protect your vital interests or those of another natural person
F	The need to perform a task carried out in the public interest or in the exercise of official authority vested in the Company
G	The need for the purposes of the legitimate interests pursued by the Company or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data
Processing grounds for special categories of personal data	
H	The need to carry out obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law
I	The need to protect your vital interests of those of another natural person where you are physically or legally incapable of giving consent
J	Legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim
K	Processing relates to personal data which you have made manifestly public
L	The need to establish, exercise or defend legal claims
M	The need of a substantial public interest , on the basis of EU or local law
N	The need of preventive or occupational medicine , of the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services , on the basis of EU or local law
O	The need of public interest in the area of public health , on the basis of EU or local law
P	The need of archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

5. With whom does the Company share your personal data?

The Company can transfer your personal data to the following recipients:

- companies that are a part of the Company's group;
- companies that process personal data in the Company's name and behalf (known as 'processors'), e.g. service providers, financial institutions, payroll processors, etc.;
- companies that process personal data in the Company's name but also act as independent controllers, e.g., professional service providers, insurance companies, travel agencies, hotels and other event organizers, etc.;
- third parties when there is a legal obligation to do so;
- commercial partners;
- the police or judicial authorities at their request if they are entitled to request the personal data.

6. Is your personal data transferred outside the European Union?

The Company transfers your personal data to the United States where it is made available to the members of the HR department, HR SAP Business Analysts and management in your line of reporting. Certain contact information is also available through Workday, Microsoft, Zoom and other communications and reporting tools made generally available to employees. Such transfer is carried out based upon standard data protection clauses and the Data Privacy Framework, as described below.

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.

We also comply with the EU-U.S. Data Privacy Framework as set forth by the U.S. Department of Commerce. The Company is committed to the Data Privacy Framework (DPF) Principles in connection with all personal data received from the European Union.

If there is any conflict between the terms in this notice and the DPF Principles, the DPF Principles shall prevail. To learn more about the Data Privacy Framework (DPF) program and to view Nu Skin's certification, please visit <https://www.dataprivacyframework.gov/>.

With respect to Personal Data received or transferred pursuant to the DPF, the Company 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.

The Company is responsible for both the processing of Personal Data received and the subsequent transfers to a third party acting as an agent on its behalf. The Company complies with the DPF Principles for all onward transfers of Personal Data from the EU, including the onward transfer liability provisions and will 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 Company commits to resolve DPF Principles-related complaints about our collection and use of personal data. EU individuals with inquiries or complaints regarding how we process or handle the personal data received in reliance on the DPF are encouraged to first contact the NSI Privacy Office at privacyoffice@nuskin.com. Individuals are also entitled to contact their local data protection authorities and/or the DPF Program here: Assistance Services (dataprivacyframework.gov) as described in more detail below.

7. For how long is your personal data retained?

Any personal data may be retained by the Company for a period of 10 years after the termination of an employee's employment contract with the Company, so that the Company can comply with its legal obligations (in particular regarding fiscal and social security obligations).

8. Does the Company use your personal data for automated-decision making, including profiling?

The Company does not use your personal data for automated-decision making or profiling. However, the Company may use machine learning and other artificial intelligence (AI) tools to process certain data, in particular for language translations, transcriptions of meetings or conversations and other purposes intended to facilitate better understanding and communication.

9. What are your rights?

To the extent permitted by and according to the modalities of applicable data protection laws, you have the right to ask the Company for access to your personal data, to correct or have deleted your personal data, to have the processing of your data restricted, as well as the right to object to the processing and the right to data portability. To the extent that the processing is based on your consent, you have the right to withdraw your consent at any time.

You can exercise any one of these rights by contacting the human resources director. Alternatively you can contact the Company via

Organization	Data Protection Office
Nu Skin International Inc. 75 West Center Street, Provo, 84601 Utah, USA +1 (801) 345-1505 privacyoffice@nuskin.com	Director, Data Protection or Data Protection Officer 75 West Center Street, Provo, 84601 Utah, USA +1 (801) 345-1505 privacyoffice@nuskin.com
NSE Products Europe BVBA The Corporate Village Building Elsinore Da Vincilaan 9 1930 Zaventem, Belgium +32 2 722 70 00 privacyoffice@nuskin.com	

The employee also has the right to file a complaint with the Commission for the Protection of Privacy, Drukpersstraat 35, 1000 Brussels, commission@privacycommission.be, www.privacycommission.be. In compliance with the EU-U.S. DPF, the Company commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF in the context of the employment relationship.

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>

10. Changes to this policy

We may update this Privacy Notice and its valid from date to reflect changes to our data governance practices. If we propose to make any material changes, we will notify you by means of a notice on this page prior to the change becoming effective.