

## REXAIR PLATFORMS PRIVACY POLICY

Rexair LLC (hereinafter “**Rexair**” or “**us**” or “**we**” or “**our**”) publishes platforms, including RBO, rainbow.net, and any apps provided by Rexair (hereinafter the “**Platforms**”) for use by independent authorized Rainbow distributors and other individual users expressly authorized by such distributors (collectively, “**you**” or “**your**”).

This Privacy Policy describes how Rexair collects, uses, and discloses personal data about you only when you access, browse, navigate, or otherwise use the Platforms and the services they provide.

Please **read this Privacy Policy carefully** as it explains how **Rexair uses your personal data**. This Privacy Policy supplements any documents or notices that may refer to this Privacy Policy.

### 1. WHAT KIND OF PERSONAL DATA COLLECTED ARE PROCESSED BY REXAIR?

All of your personal data provided by you through the Platforms or when you communicate with us are processed by Rexair. These personal data are strictly limited to those necessary to provide you with the Platforms’ services, process your request or manage our services, or as further described in Section 2 of this Privacy Policy:

Type of data	Examples of data
<b>Identification data</b>	Title, first name, last name, identity documents (ID card, driver's license), login and password on the Platforms
<b>Contact details</b>	Email address, postal address, phone number
<b>Professional information</b>	Position, name of your company, address of your company, contact details of your company
<b>Banking and financial data</b>	Bank details, invoicing information, financial reports
<b>Data related to your demonstrations</b>	Date, place, number, identity of prospects
<b>Information on your sales / performance</b>	Information on sales (number, date, place, products sold, identity of the customers, etc.), sales reports, key performance indicators
<b>Business relationship management data</b>	Requests for information / complaints (date, subject, action taken), exchanges with Rexair services

Also, the Platforms automatically collect the following data:

Type of data	Examples of data	Purposes
<b>Internet or other electronic network activity information</b>	Date and time of connection, IP address, browser type, browser language, event logs	These data are necessary for the proper functioning of the Platforms and the services provided on the Platforms, as well as internal business analytics purposes such as audience measurement.

For more information about how we collect your personal data through cookies and other tracking technologies and how you can limit what such tracking technologies collect, **please review our Cookie Policy**. Please note that our Platforms are not currently configured to respond to “do not track” signals from web browsers or mobile devices. As such, we do not recognize or respond to “do not track” requests.

**The provision of certain types of personal data may be necessary or optional**, depending on the services provided on the Platforms. Mandatory data will be marked as such at the moment of collection of your personal data. **If you refuse to provide mandatory data, Rexair may not be able to provide you with the service you requested** or respond to your other requests.

## 2. FOR WHAT PURPOSES DOES REXAIR USE YOUR PERSONAL DATA?

Rexair processes your personal data to coordinate our business relationship with you, and more specifically, for the following purposes:

Purposes	Examples of use of your personal data	Legal bases
<b>Creating and managing your account on the Platforms</b>	<ul style="list-style-type: none"> <li>to create your account</li> <li>to enable you to sign in on the Platforms</li> <li>to provide you with all the Platforms' services</li> <li>to enable you to update your account</li> </ul>	<b>Performance of the contract entered into between Distributor and Rexair</b>
<b>Monitoring your activity and performance</b>	<ul style="list-style-type: none"> <li>to conduct statistical analyses on your sales</li> <li>to establish rankings between the distributors</li> </ul>	<b>Legitimate interest</b> of Rexair to improve Distributor's performance and profitability.
<b>Improving the Platforms and the services they provide, and improving your user experience of the Platforms</b>	<ul style="list-style-type: none"> <li>to evaluate the Platforms and the services they provide</li> <li>to facilitate your navigation of the Platforms</li> <li>to guarantee the security of the Platforms</li> </ul>	<b>Legitimate interest</b> of Rexair to improve the Platforms and their services, as well as user experience on the Platforms
<b>Pre-litigation or litigation management</b>	<ul style="list-style-type: none"> <li>to take action against any violation identified</li> <li>to manage any dispute or litigation</li> </ul>	<b>Legitimate interest</b> of Rexair in defending its rights and interests
<b>Compliance with legal and regulatory obligations</b>	<ul style="list-style-type: none"> <li>to comply with legal and regulatory obligations, including for accounting/ invoicing purposes</li> <li>to process your requests to exercise your rights</li> </ul>	<b>Legal and regulatory obligations</b> to which Rexair is subject

## 3. WHO CAN ACCESS YOUR PERSONAL DATA?

Your personal data may be shared, disclosed, or otherwise transmitted to the following recipients when you access, browse, navigate and use the Platforms and the services they provide:

Recipients	Purposes
<b>Rexair and its duly authorized employees</b>	Provision of services on the Platforms, management of the Platforms, and management of the business relationship with the distributors
<b>Other distributors</b>	Distributor and his authorized sub distributors.
<b>Rexair subcontractors</b> (hosting provider, IT service providers, etc.)	Exclusively for operational, technical or logistical purposes
<b>Administrative, judiciary, or other governmental authorities</b>	In the case of an express and justified request in relation to a proven violation of legal or regulatory provisions or <ul style="list-style-type: none"> <li>when we, in good faith, believe you or others are acting unlawfully</li> <li>when we believe it is necessary or appropriate to satisfy any law, regulation or other governmental request</li> </ul>

	<ul style="list-style-type: none"> <li>➤ to protect or defend our rights or the rights or well-being of our users and/or customers</li> <li>➤ when we believe disclosure is necessary to protect the health and safety of our personnel, customers, business partners and the general public</li> </ul>
<b>Attorneys and all interested parties</b>	Exclusively in the case of pre-litigation or litigation
<b>Other third parties</b>	Following or during a restructuring, reconstitution, acquisition, debt financing, merger, sale of assets of Rexair or a similar transaction, as well as in case of insolvency, bankruptcy or receivership where personal data are transferred to one or more third parties as assets of Rexair

#### 4. WILL YOUR PERSONAL DATA BE TRANSFERRED OUTSIDE OF THE EUROPEAN UNION (EU) / EUROPEAN ECONOMIC AREA (EEA) / UNITED KINGDOM (UK)?

Rexair, the Platforms' publisher, is established in Michigan (2600 W. Big Beaver, Suite 555, Troy, MI 48084, USA). As a result, your personal data are systematically transferred to the United States for all purposes listed in Section 2 of this Privacy Policy.

When your personal data are transferred outside the EU/EEA/UK, Rexair will, in the absence of an adequacy decision and after having carried out an assessment of the level of protection of your rights on the territory of the third country where the recipient of your personal data is established, implement all necessary measures through the adoption of appropriate safeguards such as standard contractual clauses with our EU/EEA/UK-based independent distributors. A copy of such safeguards can be obtained by sending an email directly to Rexair at [privacy@rexairllc.com](mailto:privacy@rexairllc.com).

#### 5. HOW DOES REXAIR PROTECT YOUR PERSONAL DATA?

Rexair has implemented technical and organizational measures designed to protect your personal data, in particular against potential data breaches likely to cause, either by accident or unlawfully, the destruction, loss, modification, unauthorized access or divulgation of your personal data. These measures are designed to a level of security adapted to the data and will take into account the state of the art and the cost of implementation in relation to the risks and nature of the data to be protected.

Rexair requires that all members of its personnel and any other person processing your personal data will respect the internal rules and procedures related to the processing of personal data, including the technical and organizational security measures put in place to protect your personal data.

Although we use reasonable efforts to safeguard your personal data, please be aware that no method of transmission or storage of data over the Internet and through other methods can be 100% secure. Therefore, we cannot guarantee the absolute security of your personal data.

#### 6. FOR HOW LONG ARE YOUR PERSONAL DATA STORED?

As a general rule, your personal data will only be retained for the period necessary for the accomplishment of the purposes for which said data was collected, or as necessary to fulfill legal or regulatory obligations.

In the absence of applicable exceptions, Rexair will keep:

- **the personal data related to your distributor activity until termination of your business relation with Rexair;**
- **your internet and other electronic network activity information during thirteen (13) months from the connection date;**
- **your activity logs on the Platforms during six (6) months from the connection date.**

In addition to this, Rexair will keep your personal data for:

- **three (3) years** for personal data processed for marketing purposes;
- **five (5) years** for evidence purposes relating to legal claims;
- **ten (10) years** from the end of the relevant fiscal year for personal data retained for accounting purposes as well as for commercial documents.

## 7. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA?

If you have any questions or wish to exercise your rights, you may:

in relation to your personal data (i.e. identification data, contact details and professional information, Internet or other electronic network activity information) processed by Rexair for the purposes of enabling your access to the Platforms, directly contact Rexair by sending an email to [privacy@rexairllc.com](mailto:privacy@rexairllc.com); or,

- in relation to any other personal data, these rights shall be exercised by sending a request directly to your distributor.

Under certain circumstances, you must explain to Rexair why you are exercising one of these rights and, if necessary, justify your identity.

### 7. 1 IF YOU ARE LOCATED IN EU/EEA/UK:

Rexair, **as data controller**, provides you rights regarding your personal data. In accordance with the European regulations regarding the protection of personal data, you have the following rights over your personal data:

- you can request **information on the processing of your personal data** and **obtain a copy** of the personal data undergoing processing, including in electronic format, where:
  - your request is only related on your personal data (excluding anonymous or third party data);
  - your request does not adversely affect the rights or freedoms of others, including trade secrets or intellectual property.
- you can request the **rectification of your personal data** ;
- you can request the **deletion of your personal data**, where one of the following legal grounds applies:
  - your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
  - you wish to withdraw the consent on which the processing is based, and there is no other legal ground for the processing;
  - you object to the processing and there are no overriding legitimate grounds for the processing (such as obligation for Rexair to keep personal data);
  - your personal data have been unlawfully processed;
  - your personal data have to be erased for compliance with a legal obligation in Union or Member State law to which Rexair is subject;
  - your personal data have been collected in relation to the offer of information society services.
- you can request the **restriction of the processing during a limited period of time**, where one of the following applies:
  - you contest the accuracy of your personal data, the processing of which is thus restricted for the period necessary for Rexair to verify the accuracy of such personal data;
  - you object to the erasure of your personal data on the ground of the processing being unlawful and you request the restriction of their use;
  - Rexair no longer needs your personal data for the purposes of the processing, but you need them for the establishment, exercise or defense of legal claims;
  - you have objected to the processing, which is thus restricted pending the verification of whether the compelling legitimate grounds of Rexair may override your interests, rights and freedoms.
- you can **object**, on grounds relating to your particular situation, **to the processing of your personal data** when the processing is based on Rexair's legitimate interest. Rexair will no longer process your personal data unless it demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- you can ask to **receive your personal data in a structured, commonly used and machine-readable format** and also can request **their transmission to another controller** where technically feasible, where:
  - your request is only related to your personal data (excluding anonymous or third party data);
  - your request does not adversely affect the rights or freedoms of others, including trade secrets or intellectual property;
  - the processing is based on consent or on a contract ;
  - the processing is carried out by automated means.

- you can **withdraw your consent** when it has been obtained, without this withdrawal affecting the lawfulness of the processing operations previously carried out.

If needed, you may also **lodge a complaint with your national data protection authority**. This right may be exercised at any time and free of charge, at the exclusion of potential postal fees or expenses related to legal representation or assistance should you choose to engage third party assistance for the procedure.

## 8. CHILDREN'S PRIVACY

Our Services are not intended for children under the age of 16 and we do not knowingly collect any personal data from children under 16. If Rexair learns that a child under the age of 16 has submitted personal data to us, we will take all reasonable measures to delete the data as soon as possible and do not use such data for any purpose, except where necessary to protect the safety of the child or others as required or allowed by law. If you believe a child under 16 has provided us with personal data, please contact us at [privacy@rexairllc.com](mailto:privacy@rexairllc.com).

## 9. LINKS TO THIRD PARTY WEBSITES

Our Websites may contain references or links to third-party websites and services. When you click on a link to a third-party website, you leave our Website and no longer will be subject to our Privacy Policy. Rexair does not control and is not responsible for the privacy policies or practices or the content of any third-party websites, and such links are not intended to be an endorsement. We encourage you to review the privacy policies of any third-party website prior to providing them with your personal data.

## 10. CHANGES TO THIS POLICY

This Privacy Policy may be amended from time to time, in particular to reflect the changes in the services provided by the Platforms or applicable regulations. When we post modifications to this Privacy Policy, we will revise the "Last Updated" date at the top of this web page. If the changes are material, we will endeavor to notify you of such changes. We encourage you to review this Privacy Policy each time you access the Platforms.

## 11. CONTACT US

In case you have questions about this Privacy Policy or our related practices, please contact us via the contact points specified below:

By Mail:                      Privacy Compliance Team  
Rexair LLC  
2600 W. Big Beaver Rd.  
Suite 555  
Troy, MI 48084

By Email:                    [privacy@rexairllc.com](mailto:privacy@rexairllc.com).