

STEMTECH INTERNATIONAL, INC. PRIVACY STATEMENT

INTRODUCTION

Stemtech International, Inc. ("Stemtech," "us," or "we") has created this Privacy Statement to inform you about how we collect, use and disclose information.

This Privacy Statement applies to information collected through this website and any mobile sites and applications that link to this Privacy Statement (the "Site"). Except as specifically provided below, this Privacy Statement does not apply to information collected by Stemtech by or through any other means, such as information collected offline.

Stemtech grants independent business partners selling rights to its products (hereinafter referred to as Independent Business Partners or Stemtech Partners). Independent Business Partners are not employed by Stemtech. Therefore, Stemtech does not control, and is not responsible or liable for the collection, use or disclosure of Personal Information by Independent Business Partners, including for their marketing purposes. If you provide information to an Independent Sales Representative through the Site, Stemtech will have access to it and shall treat it in accordance with this Privacy Statement. Independent Business Partners may provide Stemtech with information regarding their customers, in which case Stemtech will treat such information, once in its possession, in accordance with this Statement.

If you are the customer of an Independent Sales Representative, you should check with your Representative directly to learn about her data privacy practices.

If you apply to become or are an Independent Sales Representative, in addition to the generally applicable provisions of this Privacy Statement, please review the Independent Sales Representative section at the bottom of this Privacy Statement to see important information about additional privacy practices that apply to you.

SAFE HARBOR

Stemtech International, Inc. has certified to the Safe Harbor framework agreed to by the U.S. Department of Commerce and the EU with respect to the Personal Information of Independent Business Partners collected by certain entities located in the European Economic Area and transferred to Stemtech International, Inc. in the United States. Please see our Safe Harbor Statement at Stemtech.com/safeharbour. For additional information regarding the Safe Harbor Program, see the U.S. Dept. of Commerce web site at <http://www.export.gov/safeharbor>.

PERSONAL INFORMATION

Collection of Personal Information. "Personal Information" is information that can identify you such as name, postal address (including billing and shipping addresses), telephone number, e-mail address, credit card number, and user name. We collect Personal Information from you when you choose to participate in our offers and programs or otherwise provide information directly to us, including when you register with us, purchase products, participate in our interactive features or otherwise interact with us on the Site.

Use of Personal Information. We may use Personal Information:

- for the purposes for which you specifically provided it including, without limitation, to enable us to respond to your inquiries and process and fulfill your requests;
- to send you information about your relationship or transactions with us;
- to tell you about products, services, programs, and offers that we believe may be of interest to you via e-mail, SMS, telephone or postal mail;
- to personalize your experience with us including by presenting products or offers tailored to you;

- to allow you to use, communicate and interact with others on our Site;
- to help you find an Independent Sales Representative including suggesting a new Stemtech Representative if your Stemtech Representative has discontinued selling Stemtech products, and to facilitate the business activities of an Independent Sales Representative;
- for our internal business purposes, such as data analysis, audits, developing new products, enhancing our website, improving our services, identifying usage trends, and determining the effectiveness of our promotional campaigns;
- to allow you to participate in contests and similar promotions and to administer these activities (Some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Information, so we suggest that you read these rules carefully);
- to complete and fulfill your order, or otherwise provide you with products or services, for example, to process your payments, have your order delivered to you, communicate with you regarding your purchase and provide you with related customer service; and
- to allow you to send an e-mail to other people through our "send to a friend" type functionality. (By using this functionality, you are telling us that you are entitled to use and provide us with your friend's name and e-mail address for that purpose. Your friend's information will only be used to send the forwarding e-mail and is not saved in our databases.);

Sharing Personal Information. We may disclose your Personal Information:

- to companies that are affiliated with us, that is, are part of the Stemtech family of companies, but not for their direct marketing purposes;
- to third-party service providers who provide services to Stemtech, such as website hosting, data analysis, payment processing, order fulfillment, infrastructure provision, information technology services, customer service, e-mail delivery services, credit card processing, auditing, training, and other similar services. (These third parties will be supplied with, or have access to, your Personal Information for the purpose of providing these services to us or on our behalf);
- to Independent Business Partners, to the extent necessary for them to contact you, fulfill your orders or provide a service to you;
- to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings); and
- as we believe necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

From time to time, we may give you the opportunity to opt in to participate in special third party offers that require us to share certain Personal Information with such third parties. We will disclose this anticipated sharing of Personal Information at the time we make such opportunities available to you. If you opt in to participate in such an offer, we may disclose your Personal Information to such third parties for their direct marketing purposes. We recommend that you consult such third parties' privacy policies in advance if you wish to participate in these offers.

NON-PERSONAL INFORMATION

Collection of Non-Personal Information. "Non-Personal Information" is any information that does not reveal your specific identity, such as:

- Browser information
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you or our Independent Business Partners
- Aggregated information

We and our third-party service providers may collect Non-Personal Information in a variety of ways. For example, we

- collect information such as your computer type (Windows or Macintosh), screen resolution, operating system version and Internet browser type and version.
- collect demographic information, such as your location, education, profession, age, gender, as well as other information, such as your hobbies and special interests when you voluntarily provide this information to us. Unless combined with Personal Information, this information does not personally identify you or anyone else.

Aggregating information. We may aggregate Personal Information so that the aggregated information does not personally identify you or anyone else, such as by using Personal Information to calculate the percentage of our customers who live in a particular area. In some instances, we may combine Non-Personal Information with Personal Information (such as combining your name with your geographical location). If we combine any Non-Personal Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is combined.

Use and Sharing of Non-Personal Information. Because Non-Personal Information does not personally identify you, we may collect, use and disclose Non-Personal Information for any purpose.

COOKIES AND OTHER TECHNOLOGIES

Cookies: We and our third-party service providers may use "cookies" on the Site. Cookies allow a web server to transfer data to a computer for recordkeeping and other purposes. We use cookies and other technologies to, among other things, better serve you with more tailored information and facilitate your ongoing access to and use of the Site. We also allow vendors to use cookies on our website. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. To learn more about cookies, please visit the following site, which is not affiliated with Stemtech: <http://www.allaboutcookies.org/>.

Site Analytics: Stemtech may work with third-party service providers who use the technologies described in this section to conduct website analytics to help us track and understand how visitors use our Site.

Widgets, Applications and similar technologies. If you choose to utilize technology provided by us (such as a widget), any Personal Information or other information you make available through such technology may become available publicly, for example, through social media and other websites and platforms on which you may make the applicable technology available. In addition, some technology may have the capability to be distributed "virally" in other locations (for example, a friend or a customer of yours may post the widget that contains your information to his or her blog). Stemtech is not responsible or liable for the collection, use or disclosure of Personal Information and/or other information that is made publicly available.

IP ADDRESSES

How We Collect IP Addresses

Your "IP Address" is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP).

An IP Address may be identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many websites.

How We Use and Disclose IP Addresses

We may use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, detecting fraud, and administering the Site. We may also use and disclose IP Addresses for all the purposes for which we use and disclose Personal Information. Please note that we treat IP Addresses, server log files and related information as Non-Personal Information, except where we are required to do otherwise under applicable law.

SOCIAL NETWORK AND INTERACTIVE TOOLS

Certain features on our Site may give you an opportunity to interact with us and others. These may include blogs, message boards, messaging functionality, chat functionality, and creating community profiles. When you use these features you should be aware that any information you submit, including your name, location and e-mail address, may be publicly available to others. We are not responsible for any information you choose to submit through these interactive features and we strongly discourage you from disclosing any sensitive Personal Information (such as health or credit card information) through these features. If you use these features, your Personal Information may remain on the Site even after you cease use of the Site.

THIRD-PARTY WEBSITES

Our Site may link to websites operated by other third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to or integrated with our Site, or for the privacy practices of third party Internet advertising companies. The inclusion of a link on the Site does not imply endorsement of the linked site by us. Stemtech's Independent Business Partners are solely responsible for their own websites and for any information collected on those websites. If an Independent Sales Representative uses a Stemtech Site to collect information from you, Stemtech may have access to that information and shall treat it in accordance with this Privacy Statement.

THIRD-PARTY ADVERTISERS

We may use third-party advertising companies to serve ads when you visit our Site. These companies may use information about your visit to the Site in order to provide advertisements about goods and services that may be of interest to you. In the course of serving advertisements to this Site, these companies may place or recognize a unique cookie on your browser. If you would like more information about this practice and to know your choices about not having this information used by these companies, please visit http://networkadvertising.org/optout_nonppii.asp.

SECURITY

We use reasonable organizational, technical and administrative measures to protect Personal Information under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the [Contacting Us](#) section below.

CHOICE

To opt out of receiving marketing and/or promotional offers from Stemtech you may (1) follow the "unsubscribe" instructions contained in any such emails you have received, (2) if you have registered with an Stemtech Site, you may use that Site's "modify account information" or similar functionality to opt out from receiving such messages, or (3) send us a request at the address in

the Contacting Us section below. We will endeavor to comply with all requests as soon as reasonably practicable.

ACCESS

We provide you with several options through the Sites for reviewing, correcting, updating or otherwise modifying Personal Information that you have previously provided through the Sites. If you registered with a Site, you may view, change, modify or remove certain information contained in your personal profile by using the tools found in the profile section of the applicable Site.

We will endeavor to comply with your request as soon as reasonably practicable. However, we may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed or changed. We also reserve the right, from time to time, to re-contact former Site visitors and users, including Independent Business Partners. Finally, we are not responsible for removing information or causing information to be removed from the databases or other records of third parties (including vendors, service providers, and Independent Business Partners) with whom we have already shared your Personal Information.

RETENTION

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or allowed by law.

USE OF SITE BY CHILDREN

The Site is not directed to individuals under the age of fourteen (14), and we request that these individuals not provide Personal Information through the Site.

CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in any country where we have operations, and by interacting with us and providing us with any Personal Information, you consent to the transfer of information to countries outside of your country of residence, including the United States, which may provide for different data protection rules than in your country.

UPDATES TO THIS PRIVACY STATEMENT

From time to time we may change this Privacy Statement. Please take a look at the "*LAST UPDATED*" legend at the top of this page to see when this Privacy Statement was last revised. Any changes to this Privacy Statement will become effective when we post the revised Privacy Statement on the Site. Your interaction with us following these changes means that you accept the revised Privacy Statement.

CONTACTING US

If you have any questions about this Privacy Statement, please contact us by e-mail at safeharbor@stemtech.com or by regular mail at Stemtech International, Inc., Attn: SVP Global Business. Because e-mail communications are not always secure, please do not include sensitive information in your e-mails to us.

INDEPENDENT BUSINESS PARTNERS

The following provisions are applicable only to Stemtech's Independent Business Partners:

This Privacy Statement applies to the Personal Information of Independent Business Partners collected by Stemtech, whether collected online or offline. This information would be collected in addition to any Personal Information we may collect from you as an Stemtech customer, as described above.

If you seek to become a Stemtech Representative we may collect and use your Personal Information including credit-related information to determine your eligibility.

In order to be appointed an Stemtech Representative, you may be required to enter into a separate agreement with Stemtech ("Representative Agreement"). If you have entered into a

Representative Agreement, we may collect, use and disclose your Personal Information in accordance with this Privacy Statement and the terms of your "Representative Agreement." We also may collect, use and disclose your Personal Information as necessary to fulfill our obligations under the Representative Agreement. In the event of a conflict between this Privacy Statement and the Representative Agreement, the terms of the Representative Agreement shall apply.

Once you are an Stemtech Representative (including a sales leader), we may disclose your Personal Information:

- to district managers, area sales managers or their equivalent, who may be independent contractors to Stemtech;
- as part of our sales leadership program, to Stemtech Partners who are sales leaders;
- to current and potential customers who are seeking the assistance of an Stemtech Representative; and
- as necessary to comply with legal requirements such as tax and record keeping obligations.

We may also combine the Non-Personal Information that we and our third-party service providers collect about your use of our Site (as described above) with your unique Representative account number. We may use the combined information for purposes such as to analyze Stemtech Partners' use of our Sites, in order to evaluate and make improvements to our business model, and for other internal analytics purposes