

# NIKKEN PRIVACY POLICY

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# 1. What is our Privacy Policy?

Nikken is committed to protecting the privacy of its Consultants and Customers and has taken strong measures to ensure that the information gathered from you will be secure and confidential. According to the principles relating to the processing of personal information your data will be:

- Fairly and lawfully processed
- · Processed for a limited time
- Adequate, relevant and not excessive
- Accurate
- Not kept longer than necessary
- Processed in accordance with your rights
- Secure
- Encrypted when required (credit card information)

By visiting our website you are accepting and consenting to the practices described in this Privacy Policy.

# 2. Collection and use of your personal information

The information we receive from you helps us personalise and continually improve your experience with Nikken. We use the information to handle orders, deliver products and services, process payments, communicate with you about orders, products, incentives and promotional offers, update our records and generally maintain your accounts with us, display content such as wish lists and customer reviews and recommend Nikken products and services that might be of interest to you. We also use this information to improve our online store and platform, prevent or detect fraud or abuses of our website and enable third parties to carry out technical, logistical or other functions on our behalf. The accuracy of your personal data is dependent on the information that you provide to us.





## 3. What information do we gather?

If you are registering as a Consultant or Customer we will collect the following personal data from you:

- Contact information (e.g. name, postal and e-mail address, and phone number)
- Date of birth
- Password
- Tax information to the extent required by applicable law
- Payment information (e.g. bank account and/or credit card numbers)
- · Communication preferences

NOTE: You will have the option to opt in during the registration process in order to receive communication regarding product promotions, special offers, incentives and news from Nikken. You will also be able to choose if you want to be contacted by your Consultant/upline for support and information.

We may collect other personal data in exceptional circumstances only. If we need to process such personal data about you, we will make sure that there is a valid legal basis for doing so (e.g. your explicit consent).

### 4. How do we use the data?

# We will use the information we obtain about you to:

- Manage your registration as a Consultant or Customer
- Create and manage your online account and our back end systems containing your information
- Respond to your enquiries
- · Process your orders of products or services
- Communicate with you
- Facilitate your use of the Website through the use of cookies (e.g. to offer the shopping basket functionality, to remember log in details and language preferences, etc.)
- Improve the Website, including by tracking and monitoring your use of the Website through the use of cookies, and to diagnose problems with the software or hardware we use
- Perform accounting, auditing, billing and collection activities
- · Comply with applicable legal requirements, industry standards and our policies.

#### **Data Security is Important to us**

Ensuring security online is important to us and we respect your privacy. We use a secured server for the information that you provide to us. To protect your credit card information when placing orders, we use SSL (secure sockets layer) to encrypt all order information, such as your name and credit card number, so that it can't be read in transit. The personal data we store for your distributorship or customer account will be kept in a secure server or servers, protected by passwords and firewalls. We will take care in order to avoid loss, misuse and alteration of your personal data. We collect, use and store certain types of personal data, according to the principles set by EU law and transposed into different national legislations. The data is not kept for longer than is necessary for the purposes set out in this Notice.





#### 5. Information that we share

We do not sell Consultant or Customer names or other private profile information to third parties. We will not share your data with third parties for the purpose of their direct marketing.

While we may provide statistics to outside companies about our Consultants (including sales and related site information), Nikken will not include any personally identifying information.

At present, Nikken centralises its records of personal information for all European Nikken operations in Europe for the purposes of Nikken business. However, we may share your personally identifiable information, either for processing or storage, with other companies in the Nikken Group, their employees and agents to administer any accounts, products and services provided to you by the Nikken Group now or in the future. Data sent to other companies in the Nikken Group are sent through a Virtual Private Network that uses 3DES encryption. They are either subject to this Privacy Policy or follow practices at least as protective as those described in this Privacy Policy.

We employ other companies and individuals located inside and outside of the European Economic Area, to perform functions on our behalf. Examples include fulfilling orders, delivering packages, analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit card payments - processing of such credit card payments and transactions are done in compliance with current PCI-DSS standards and practices as described by the PCI Standards Council, and providing customer service. They have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with this Privacy Notice and as permitted by the General Data Protection Regulation (GDPR).

We may be required to disclose your information to the government or third parties under a valid legal request. For example, a criminal investigation or a lawful subpoena may force disclosure. This is required of every business.

## 6. Other websites

Our Policy does not apply to other websites. Third party internet sites and services accessible through www.nikken.com/eu/ have separate privacy and data collection practices that are beyond our control and cannot assume responsibility or liability for their independent practices or actions. We recommend that you carefully read the privacy policy of third party websites before agreeing to leave any personal information.

# 7. How do we protect your information?

We make sure that each online communication with our Consultants and Customers meets our high standards of privacy and security. We do this by using a secure server with software that encrypts all of our confidential information before you send it to us. This allows us to encrypt the traffic between the web server and the user's web browser. In addition, we take strong measures to protect all data against unauthorised access.

Please note that we do not have control over the computers/devices you use to transmit your personal information. It is your responsibility to make sure that the computer/device you use is properly secured and maintained.





#### 8. Cookies

When you view the site for the first time on a new device you will be asked to accept cookies. "Cookies" are very small text files your web browser stores on your computer when you visit some websites. It is your identification card, and cannot be executed as code or deliver viruses. It is uniquely yours and can only be read by the site that gave it to you.

Our cookies help make it easier for you to use our websites and to help us customize your experience so that we can provide you with the information you need - when and where you need it. A cookie generated by <a href="https://www.nikken.com/eu/">www.nikken.com/eu/</a>, for example, allows you to retrieve your Shopping Cart and address information on a return visit. Cookies do not collect this information, nor is your name, address or product information contained within the cookie itself. The cookie simply holds the "key" that, once read by our websites, unlocks this information.

Because we rely on cookies to make the shopping experience easier and more tailored to your needs, your browser must be set to accept cookies before you can place an order. You can delete existing cookies by using your browser's configuration interface. All our cookies are secured by 128-bit encryption.

# 9. Your rights

We take the security of your data very seriously. When using this website you consent to the collection and use of your information by Nikken. As a Consultant or Customer, you will be able to access and change your preferences for contact at any time by logging onto your account with your personal login details.

Your rights under applicable law may include access to the personal data we process about you, the right to have such personal data corrected, erased or blocked, and the right to object to certain data processing activities. To exercise these rights, you should make a written request using our contact details set out below.

If you feel there is a problem in the way your personal data is being handled by Nikken, you may file a complaint to the Information Commissioner's Office.

#### 10. How to contact us

This website belongs to Nikken UK Limited, Gloucester House, 399 Silbury Boulevard, Central Milton Keynes, MK9 2AH, United Kingdom. This Policy is under the supervision of our IT Manager and Data Privacy Officer. We are registered as a data controller with the UK Information Commissioner's Office. Our data protection registration number is Z7666354.

If you have any concerns regarding this Policy, feel free to contact Nikken's Customer Services team. You may contact them at any time at the address above or via email at <a href="mailto:uksupport@nikken.co.uk">uksupport@nikken.co.uk</a> to consult, request a change or deletion of personal information we have collected from you. You will receive a written confirmation from our Customer Services team when your requests have been actioned.

## 11. Amendments to our Privacy Policy

This Policy was updated on May 2018. If we alter our Privacy Policy in any way, we will post these changes here so you can be aware of anything that may affect you in the way we disclose information. Please check this page from time to time to ensure that you are aware of those changes.

