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# Privacy Policy VHL

**LAST UPDATED: Feb 8, 2023**

This privacy policy ("**Privacy Policy**") describes how Vibrant Healed Life/True Blue Exteriors Inc. ("**Company**," "**we**," "**us**," and "**our**") collects, uses and shares personal information when using each of the following websites

<https://www.vibranthealedlife.com> and

<https://www.vibranthealedlife.com/kiss-fatigue-goodbye> (the "**Site**") or our products and services (together, the "**Services**"). Please also read the Terms of Use which sets out the terms governing the Services along with any other additional agreements, terms, guidelines or policies provided to or entered into by you that are applicable to your use of our Services.

Your privacy is very important to us. Our Privacy Policy explains the information we collect, how we use and share it, how to manage your privacy settings, and your rights in connection with the Services.

## **SECURITY AND CONFIDENTIALITY OF YOUR PERSONAL INFORMATION**

We operate a range of technical, non-technical and procedural controls to safeguard your Personal Information (including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage). In particular:

We use: (a) firewalls and encryption; and (b) physical and technical controls on, and monitoring of, access to our premises and systems.

We only engage reputable suppliers and undertake appropriate information security and regulatory compliance due diligence on them.

We will periodically review and update the adequacy of our methods above as the sensitivity and geographical scope of our services expand.

The transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Information transmitted to our website – and any such transmission is at your own risk. Our website may also, from time to time, contain links to third party websites – which are outside of our control and are not covered by this Notice. If you access other

websites using the links provided, please check their privacy policy before submitting any Personal Information to them.

## **DATA BREACHES**

If a data breach (leading to the destruction, loss, alteration, unauthorized disclosure of, or access to, your Personal Information) occurs which is likely to result in a high risk of adversely affecting your rights and freedoms, we will inform you of this without undue delay.

Where legally permitted, any such notifications will be made either via email, mail, or telephone.

We are based in Canada and our Services are provided to you by us. If you are a resident of the European Economic Area (“**EEA**”), the Company is the controller of your personal information for the purposes of EEA data protection law.

We will post any modifications or changes to the Privacy Policy on our Site. We reserve the right to modify the PRIVACY Policy at any time, so we encourage you to review it frequently. The “Last Updated” date indicates when this Policy was last changed. If we make any material changes to the Policy, we will post a notice on our Site.

This Privacy Policy was written in English. To the extent a translated version conflicts with the English version, the English version controls. Unless indicated otherwise, this Privacy Policy does not apply to third party products or services or the practices of companies that we do not own or control, including other companies you might interact with on or through the Services.

Questions or comments about this Privacy Policy may be submitted by mail to the address below or to [support@vibranthealedlife.com](mailto:support@vibranthealedlife.com)

**Vibrant Healed Life**  
**Division of True Blue Exteriors Inc**

RR 2

Tara, ON NOH 2NO Canada

Attn: Support

### **What is personal information?**

We collect information about you in a range of forms, including any information which, either alone or in combination with other information we hold about you, identifies you as an individual, including, for example, your name, postal address, location, browser usage, email address, telephone number, user name, password, demographic information and billing and payment information.

### **Why we need your personal information**

We need certain personal information in order to provide you with access to our Service. In order to access some of our Services, such as purchase or participation in one of our products or services, you will need to agree to provide us this information. By providing us this information you are consenting to our use of your information and this consent provides us with the legal basis we require under applicable law to process your data. You maintain the right to withdraw such consent at any time. If you do not agree to our use of your personal information pursuant to this Privacy Policy, please do not use our Services.

### **How we use your personal information**

We may use your personal information as follows:

- to operate, maintain, and improve our Services and develop future products, and services;
- to manage your account, including to communicate with you regarding your account, if you have a Services account;
- to operate and administer and allow you to participate in sweepstakes, contests or other promotions;
- to respond to your comments and questions and to provide to you support services;
- to send information including technical notices, updates, security alerts, support and administrative messages and legal information and disclosure;
- to send you marketing emails and other communications about upcoming promotions, and other news, including information about products and services offered by us and our affiliates. You may opt-out of receiving such email and sms communications at any time by connecting us or logging to

your account profile. Please note, even if you opt out of receiving marketing communications, we may still send you non-marketing communications, including emails about the status of your Service and our business dealings with you;

- to provide you with coaching and support to help you complete your training and achieve goals relevant to our training and programs;
- to process payments you make in connection to our Services and collect payments owed to us;
- to link or combine user information with other personal data;
- recognize you and analyze how you, and other users, navigate our Services;
- analyze comments and feedback you have given us including comments, feedback and reviews you have posted on or through our Services;
- fulfill orders for products or services placed through our Services.
- verify or obtain payments due to us when you purchase a product or service from a third party after clicking on an “affiliate” link in or through our Services or communications we provide you, measure the performance of affiliate links, analyze and develop this part of our business
- ask you to take part in or conduct a survey or undertake research about our Service or products and services in development;
- administration and protection of our business including troubleshooting, data analysis, testing, system maintenance, user support, reporting and hosting data, administration and IT services, network security, fraud prevention, customer services and business reorganization, including exchanging information with third parties for fraud protection and spam/malware prevention;
- serve content and other materials and analyze their performance and effectiveness;
- to improve and develop our data analytics, products and services and inform our marketing strategy;
- as we believe necessary or appropriate (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities; (c) to enforce our Privacy Policy, Terms of Use and other Company policies and guidelines; and (d) to protect our rights, privacy, safety or property, and that of you or others; and
- as described in the “Sharing of your personal information” section below.

## **Sharing of your personal information**

We may share your personal information as follows:

- **Third Parties Designated by You.** We may share your personal information with third parties where you have provided your consent to do so.
- **Our Third-Party Service Providers.** We may share your personal information with our third-party service providers who provide services such as data analysis, payment processing, information technology and related infrastructure provision, customer service, email and other communication delivery, auditing and other similar services.
- **Third Party Advertisers.** We may share personal information with advertisers and advertising networks that require the data to select and serve relevant advertisements to you and others.
- **Affiliates.** We may share some or all of your personal information with our affiliates, in which case we will require our affiliates to comply with this Privacy Policy.
- **Corporate Transactions** If we become involved in a business combination, securities offering, bankruptcy, reorganization, dissolution or other similar transaction, we may share or transfer your personal information in connection with such transaction.

**Other Disclosures.** We may share personal information as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet law enforcement requirements; (c) to enforce our Privacy Policy, Terms of Use and other Company policies, terms, agreements and guidelines; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

### **How we collect your personal information**

We collect information about you in the following ways:

**Information you give us.** This includes:

- the personal information you provide when you use, sign up, apply or enroll for our Services, including on our Site or over the phone or, to receive information about our Services;

- the personal information that may be contained in any video, comment or other submission you upload or post in connection to your use of the Service;
- the personal information you provide us in connection with your use of our Services, including application, registration and enrollment information;
- the personal information you provide us in connection with the promotions we offer as part of the Services;
- the personal information you provide when you report a problem with our Services or when we provide you with customer support;
- the personal information you provide when you make a purchase of our product or services or through our Services, including payment and billing information; and
- the personal information you provide when you correspond with us by phone, email or otherwise.

**Information We Get from Others.** We may also get information about you from other sources, marketers, partners, researchers, and others. We may combine information that we collect from you with information obtained from other third parties and information derived from any other product or service we provide.

**Information Automatically Collected.** We may automatically log information about you and your computer or mobile device when you access our Services. For example, when visiting using our Services, we log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Services, pages you viewed, how long you spent on a page, access times and information about your use of and actions on our Services. We collect this information about you using cookies. Please refer to the sections on cookies and Pixel Tags below.

### **What information we collect with “cookies”**

#### **What are cookies?**

We may collect information using “cookies.” Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to

provide you with a more personal and interactive experience on our Site. We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which are used only by us to recognize your computer or mobile device when it revisits our Site; and (2) third party cookies, which are served by service providers on our Site, and can be used by such service providers to recognize your computer or mobile device when it visits other websites.

## **Cookies we use**

Our Site from time time may use the following types of cookies for the purposes set out below:

### **Type & Purpose of Cookie**

#### **Essential Cookie**

These cookies are essential to provide you with services available through our Site and to enable you to use some of its features. For example, they allow you to log in to secure areas of our Site and help the content of the pages you request load quickly. Without these cookies, the services that you have asked for cannot be provided, and we only use these cookies to provide you with those services.

*Functionality Cookies:* These cookies allow our Site to remember choices you make when you use our Site, such as remembering your login details and remembering the changes you make to other parts of our Site which you can customize. The purpose of these cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you visit our Site.

## **Type & Purpose of Cookie**

*Analytics and Performance Cookies*; These cookies are used to collect information about traffic to our Site and how users use our Site. The information gathered does not identify any individual visitor. It includes the number of visitors to our Site, the websites that referred them to our Site, the pages they visited on our Site, what time of day they visited our Site, whether they have visited our Site before, and other similar information. We use this information to help operate our Site more efficiently, to gather broad demographic information and to monitor the level of activity on our Site.

We use Google Analytics for this purpose. Google Analytics uses its own cookies. It is only used to improve how our Services work. You can find out more information about Google Analytics cookies here:

<https://developers.google.com/analytics/resources/concepts/gaConceptsCookies>

You can find out more about how Google protects your data here:

[www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html).

You can prevent the use of Google Analytics relating to your use of our Site by downloading and installing the browser plugin available via this link: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>

*Targeted and advertising cookies*: These cookies track your browsing habits to enable us to show advertising which is more likely to be of interest to you. These cookies use information about your browsing history to group you with other users who have similar interests. Based on that information, and with our permission, third party advertisers can place cookies to enable them to show advertisements which we think will be relevant to your interests while you are on third party websites. You



## **Type & Purpose of Cookie**

can disable cookies which remember your browsing habits and target advertising at you by visiting

<http://www.youronlinechoices.com/uk/your-ad-choices>. If you choose to remove targeted or advertising cookies, you will still see adverts but they may not be relevant to you. Even if you do choose to remove cookies by the companies listed at the above link, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.

*Social Media Cookies:* These cookies are used when you share information using a social media sharing button or “like” button on our Site or you link your account or engage with our content on or through a social networking website such as Facebook, Twitter or Pinterest. The social network will record that you have done this.

## **Disabling cookies**

You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the “settings,” “help” “tools” or “edit” facility). Many browsers are set to accept cookies until you change your settings.

Further information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.com.uk](http://www.youronlinechoices.com.uk).

If you do not accept our cookies, you may experience some inconvenience in your use of our Site. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Site.

### **Pixel Tags**

We may also use pixel tags (which are also known as web beacons and clear GIFs) on our Site to track the actions of users on our Site. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages. Pixel tags measure the success of our marketing campaigns and compile statistics about usage of the Site, so that we can manage our content more effectively. The information we collect using pixel tags is not linked to our users' personal data.

### **Session Replay Tools**

From time to time, we may use session replay tools to track your actions, including but not limited to mouse movements and selections, on our Site. We use these sessions, among other things, to measure the success of our marketing campaigns, compile statistics regarding usage of our Site, assist with website design, evaluate user interface updates, assist in troubleshooting, and create other ways to enhance user experiences.

### **Do Not Track**

Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

### **What is anonymous data?**

When we use the term "anonymous data," we are referring to data and information that does not permit you to be identified or identifiable, either alone or when combined with any other information available to a third party.

We may create anonymous data from the personal information we receive about you and other individuals whose personal information we collect. Anonymous data might include analytics information and information collected by us using cookies.

We make personal information into anonymous data by excluding information (such as your name) that makes the data personally identifiable to you. We use this anonymous data to analyze usage patterns in order to make improvements to our Services.

### **Third party sites.**

Our Service may contain or offer links to third party websites, features and products and services. This Policy does not cover the privacy practices of such third parties. These third parties have their own privacy policies and we do not accept any responsibility or liability for their websites, features or policies. Please read their privacy policies before you submit any data to them.

### **User generated content.**

You may share personal information with us when you submit user generated content to or through our Services, including via forums, message boards and blogs on or through our Services, such as with account profile. Please note that any information you post or publish on or through Services will become public information and will be available to other users of our Services and to the general public. We urge you to be very careful when deciding to disclose your personal data, or any other information, on or through our Service. Such personal information and other information will not be private or confidential once it is published.

If you provide feedback to us, we may use and disclose such feedback on or through our Services, provided we do not associate such feedback with your personal information. If you have provided your consent to do so, we may post your name along with your feedback on or through our Services. We will collect any information contained in such feedback and will treat the personal information in it in accordance with this Policy.

### **EU users: international data transfer**

When we or our affiliates and other third parties process your personal information this may involve processing, transferring and storing your information outside the country in which you reside, including, but not limited to the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world in order to provide the Service and perform the

Terms of Use. By using our Services, you agree to this transfer, storing or processing.

## **Security**

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization. Unfortunately, no transmission or storage system can be guaranteed to be completely secure, and transmission of information via the internet is not completely 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 using the details in Section 19 below.

## **Retention**

We keep your personal information for as long as we need it for the purposes for which it was collected. We may select to retain certain information for longer periods for certain legal, regulatory, contractual or accounting obligations. When we decide how long we will keep your information we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure, why we need it, and any relevant legal requirements. We may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely.

## **Our policy on children**

Our Services are not directed to children under 18. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us using the details in Section 19 below. We will delete such information from our files as soon as reasonably practicable.

## **Sensitive personal information.**

If you send or disclose any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) to us, you consent to our processing and use of such

sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such information to us.

### **EEA Members' Rights**

If you send or disclose any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) to us, you consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such information to us.

### **Sensitive personal information.**

If you are habitually located in the EEA, you have the right to access, rectify, download or erase your information, as well as the right to restrict and object to certain processing of your information. While some of these rights apply generally, certain rights apply only in certain limited circumstances. We describe these rights below:

- **Opt-out.** You may contact us anytime to opt-out of: (i) direct marketing communications; (ii) our collection of sensitive personal data; (iii) any new processing of your personal information that we may carry out beyond the original purpose; or (v) the transfer of your personal information outside the EEA. Please note that your use of some of the Services may be ineffective upon opt-out.
- **Access.** You may access the information we hold about you at any time through your account profile or by contacting us directly.
- **Amend.** You can also contact us to update or correct any inaccuracies in your personal information.
- **Move.** You can contact us for a copy of your personal information and can ask for a copy of personal information you provided in machine readable form.
- **Erase and forget.** In certain situations, for example when the information we hold about you is no longer relevant or is incorrect, you can request that we erase your data.

If you wish to exercise any of these rights, please contact us using the details above. In your request, please make clear: (i) what personal information is concerned; and (ii) which of the above rights you would like to enforce. For your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any event, within thirty (30) days of your request. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion.

### **Notice to California Residents – Your California Privacy Rights**

Individuals who are residents of California and have provided their personal information to us may request information regarding our disclosures, if any, of their personal information to third parties for direct marketing purposes. Such requests must be submitted to us at [support@vibranthealedlife.com](mailto:support@vibranthealedlife.com) or in writing at Vibrant Healed Life % True Blue Exteriors Inc, RR 2, Tara, ON N0H 2N0 You may make one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for your response. Please allow up to thirty (30) days for a response.

### **Questions and Concerns**

Should you wish to raise a concern about our use of your information please contact us at [support@vibranthealedlife.com](mailto:support@vibranthealedlife.com) or in writing at: Vibrant Healed Life RR 2, Tara, ON N0H 2N0 We will reply to your inquiry as soon as we can and in any event, within forty (45) days. We hope to resolve any concern brought to our attention, however if you feel that your concern has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority.