



## IDLife Privacy Notice

**Effective Date: July 1, 2026**

This Privacy Notice explains how IDLife, LLC and its U.S. affiliates (“IDLife,” “we,” “our,” or “us”) collect, use, disclose, retain, and protect personal information through [www.idlife.com](http://www.idlife.com), IDLife-provided Independent Associate web pages, our e-commerce platform, account portal, product recommendation tools, Product Subscription services, and any other IDLife digital service where this Privacy Notice is posted (collectively, the “Services”).

This Privacy Notice applies to users in the United States, including all 50 states, the District of Columbia, Puerto Rico, Guam, the U.S. Virgin Islands, American Samoa, the Northern Mariana Islands, and any other U.S. territory where IDLife makes the Services available. The Services are intended for use in the United States and U.S. territories. If you access the Services from outside those locations, you understand that your information may be processed in the United States and may be subject to U.S. law.

For questions or privacy requests, contact us at:

IDLife, LLC  
Attn: Compliance Department  
10825 John W. Elliott Dr., Suite 100  
Frisco, Texas 75033  
Email: [compliance@idlife.com](mailto:compliance@idlife.com)  
Phone: 972.987.4430

### 1. Plain-English Summary

Here is the practical version.

- We collect information you give us, information created when you use our Services, information from IDLife Associates, and information from service providers and business partners.
- We use that information to operate our business, process orders and payments, provide product recommendations, administer Product Subscriptions, support Associates, prevent fraud, comply with law, communicate with you, and improve our products and Services.
- Some information may be sensitive, including health and wellness information, genetic or test-related information, government identifiers, payment-related information, precise geolocation if enabled, account credentials, and similar information.
- IDLife is not a healthcare provider, health plan, healthcare clearinghouse, or medical laboratory. Unless IDLife is acting under a written HIPAA business associate agreement, information you provide to IDLife generally is not Protected Health Information under HIPAA. Even when HIPAA does not apply, we treat health, wellness, genetic, test-related, and similar sensitive information with heightened safeguards.
- IDLife does not store full payment card numbers, CVV/security codes, or full magnetic-stripe or chip data in IDLife-controlled company systems. Payment information is processed and tokenized by payment processors and third-party payment service providers.
- We do not sell personal information for money. We may use cookies, pixels, analytics, advertising technologies, and similar tools in ways that may be considered a "sale," "sharing," or "targeted advertising" under certain state privacy laws. You may opt out as described below.
- We do not sell consumer health data, genetic information, biometric identifiers, government identifiers, payment



information, or information about children. We may use health, wellness, assessment, personalization, and product-interest information you choose to provide to recommend and market IDLife products and wellness content to you through IDLife-controlled channels, subject to your choices and applicable law. We do not disclose detailed assessment responses, genetic information, or consumer health data to third-party ad networks for cross-context behavioral advertising unless separately disclosed and authorized where required.

## **2. Information We Collect**

We may collect the following categories of personal information, depending on how you interact with IDLife.

### **2.1 Identifiers and Contact Information**

Examples include name, mailing address, billing address, shipping address, email address, telephone number, account username, account ID, Associate ID, IP address, online identifiers, and similar identifiers.

### **2.2 Account and Credential Information**

Examples include username, password, password hints, authentication information, account preferences, Product Subscription settings, communication preferences, account history, login history, and security settings.

### **2.3 Commercial and Transaction Information**

Examples include products viewed or purchased, order history, Product Subscription history, VIP Customer status, discount eligibility, returns, exchanges, refund history, customer service interactions, product preferences, promotion eligibility, and Associate relationship, lineage, volume, or business information where applicable.

### **2.4 Payment and Financial Information**

Payment card, debit card, ACH, digital wallet, financing, and similar payment information may be collected and processed by IDLife payment processors, digital wallet providers, financing providers, fraud-prevention providers, and other third-party payment service providers available at checkout. IDLife does not store full payment card numbers, CVV/security codes, or full magnetic-stripe or chip data in IDLife-controlled company systems. Payment card

information is tokenized or otherwise processed by IDLife payment processors and third-party service providers.

IDLife may receive and retain limited payment-related information, such as payment tokens, transaction identifiers, authorization status, card brand, last four digits, expiration month and year, billing information, payment confirmations, chargeback information, fraud-screening results, refund information, and records needed to process orders, recurring charges, refunds, chargebacks, accounting, tax reporting, fraud prevention, and legal compliance.

### **2.5 Government Identifiers and Fraud-Verification Information**

Examples include Social Security number, tax identification number, date of birth, driver license information, passport information, sanctions-screening information, or other verification information when needed for Associate onboarding, payment, tax reporting, identity verification, fraud prevention, legal compliance, or security review.

### **2.6 Health, Wellness, Lifestyle, and Personalization Information**

Examples include information you provide through an IDLife product quiz, wellness assessment, health profile, personalization tool, wearable connection, or customer support interaction, such as age, date of birth, sex or gender, height, weight, wellness goals, nutrition habits, lifestyle, sleep, activity, allergies, sensitivities, medications, supplements, health conditions, symptoms, family-health context, lab-related information you choose to provide, and product recommendation history.

### **2.7 Genetic, DNA, Methylation, and Test-Related Information**

If you purchase, use, register, or interact with DNA Tests, Methylation Tests, or similar testing products or services, we may collect information related to your test order, kit status, consent status, sample status, test registration, results, reports, recommendations, and customer support. Separate test-provider terms, consents, privacy notices, laboratory policies, and sample-retention policies may also apply.

### **2.8 Biometric Information**

IDLife does not currently seek to collect biometric identifiers or biometric information, such as facial geometry, fingerprint,



retina scan, or voiceprint, for identification or authentication through the Services. Photographs, videos, call recordings, event recordings, or voice communications are treated as communications or sensory information unless IDLife uses them to identify a specific person through biometric analysis. If IDLife later offers a feature that collects biometric identifiers or biometric information, IDLife will provide additional notice and obtain consent where required by law.

### 2.9 Device, Internet, and Electronic Activity Information

Examples include IP address, browser type, device type, operating system, referring and exit pages, pages viewed, links clicked, search terms, date and time stamps, clickstream data, taps, swipes, scrolling behavior, interactions with emails, ads, or website features, and similar electronic activity information.

### 2.10 Session Replay and Website Analytics

If IDLife uses session-replay, screen-recording, or similar website analytics tools, those tools are used to understand website functionality, troubleshoot errors, improve checkout, detect fraud, and improve customer experience. IDLife configures these tools, where available, to mask or suppress payment information, passwords, government identifiers, health questionnaire responses, genetic or test-related results, and other sensitive information from replay capture.

### 2.11 Location Information

Examples include general location based on IP address and, if you permit it, precise geolocation from GPS, Wi-Fi, cell tower, Bluetooth, or device settings.

### 2.12 Communications and Customer Service Information

Examples include emails, texts, chat messages, form submissions, call notes, call recordings, voicemails, survey responses, product reviews, testimonials, photographs, videos, social-media interactions, and other communications with IDLife.

### 2.13 Inferences, Recommendations, and Automated Tools

Examples include product recommendations, wellness profiles, preference profiles, predicted interests, marketing segments, fraud-screening outputs, Product Subscription suggestions, and other inferences created from information we collect. IDLife may use automated tools, analytics, recommendations, fraud-screening, and similar technologies

to provide product recommendations, personalize content, detect fraud, secure accounts, and improve the Services. IDLife does not use profiling or automated decision-making to make decisions that produce legal or similarly significant effects concerning consumers, such as decisions about employment, credit, housing, insurance, education, criminal justice, or access to essential services.

### 2.14 Sensitive Personal Information

Certain information listed above may be considered sensitive under applicable law, including government identifiers, account credentials, payment information, precise geolocation, health information, genetic information, biometric information if collected, contents of certain communications, and other information treated as sensitive by applicable law. IDLife does not seek to collect sensitive personal information that is not reasonably necessary for the Services, legal compliance, security, fraud prevention, or another disclosed purpose.

## 3. Sources of Information

We collect information from these sources:

- **You.** When you create an account, check out as a guest, purchase products, enroll in a Product Subscription, complete a quiz, submit health or wellness information, contact customer service, post reviews, register a test kit, apply as an Associate, or otherwise use the Services.
- **Your Devices and Browser.** Through cookies, pixels, SDKs, server logs, analytics tools, security tools, and similar technologies.
- **IDLife Associates.** Including information needed to support customer relationships, product orders, Associate business activity, lineage reporting, commission calculation, and compliance.
- **Service Providers and Business Partners.** Including Exigo, payment processors, digital wallet providers, financing providers, fulfillment vendors, carriers, tax providers, hosting providers, fraud-prevention and identity-verification providers, marketing platforms, analytics providers, communications providers, test providers, laboratories, and customer service tools.
- **Publicly Available and Commercially Available Sources.** Where permitted by law.



- **Third-Party Platforms.** If you choose to interact with IDLife through social media, single sign-on, digital wallet, advertising platforms, or other third-party services.

#### 4. How We Use Information

We may use personal information for the following purposes:

- To provide, operate, maintain, secure, and improve the Services.
- To create and manage accounts.
- To process orders, payments, taxes, shipping, returns, refunds, exchanges, Product Subscriptions, and customer service requests.
- To provide personalized product recommendations and wellness-related content based on information you choose to provide.
- To personalize and market IDLife products, Product Subscriptions, product bundles, wellness content, educational materials, offers, and promotions based on information you choose to provide through assessments, quizzes, wellness profiles, personalization tools, customer support interactions, product interest, and order history.
- To administer DNA Tests, Methylation Tests, or similar products, including registration, consent management, test-provider coordination, report access, and related customer support.
- To provide Product Subscription confirmations, renewal reminders, cancellation confirmations, price-change notices, and other transactional communications.
- To calculate taxes using tax providers and to fulfill orders through carriers and fulfillment providers.
- To process payments and digital wallet transactions through payment processors, digital wallet providers, financing providers, and other payment providers available at checkout.
- To host, secure, and support our systems, including through hosting, cloud, security, and technology providers.
- To detect, prevent, investigate, and respond to fraud, unauthorized activity, identity misuse, chargebacks, policy violations, security incidents, and legal claims.
- To verify identity, Social Security number, tax information, or other information where needed for Associate onboarding, payments, tax reporting, fraud prevention, or compliance.
- To communicate with you by email, phone, postal mail, text message, app notification, Back Office notice, or other channels, subject to your communication choices and applicable law.
- To send marketing, promotions, surveys, offers, and content that may interest you, subject to applicable opt-out rights.
- To measure and improve advertising, website performance, product interest, customer experience, and business operations.
- To support IDLife Associates, Associate-provided website pages, lineage reporting, compensation calculations, customer support, product ordering, compliance, and enforcement of IDLife policies.
- To comply with law, enforce agreements, protect rights and safety, respond to legal process, cooperate with regulators or law enforcement, and defend legal claims.
- To de-identify, aggregate, or anonymize information and use it for analytics, research, product development, business intelligence, compliance, and operational purposes.

#### 5. Health, Genetic, Biometric, and Other Sensitive Information

IDLife may collect sensitive information when you choose to provide it, including through product quizzes, wellness assessments, personalization tools, test-related services, wearable connections, Product recommendations, and customer support. We use this information to provide requested products, test-related services, recommendations,



reports, customer support, safety review, compliance, and related operational purposes.

### **5.1 HIPAA Status**

IDLife is not a healthcare provider, health plan, healthcare clearinghouse, or medical laboratory. Unless IDLife is acting under a written HIPAA business associate agreement, information you provide to IDLife generally is not Protected Health Information under HIPAA. Even when HIPAA does not apply, IDLife treats health, wellness, genetic, biometric, and test-related information as sensitive and applies heightened administrative, technical, and physical safeguards designed to protect it.

### **5.2 No Medical Advice**

IDLife does not provide medical advice, diagnosis, treatment, cure, or disease prevention. Product recommendations, quizzes, wellness information, DNA Test information, Methylation Test information, reports, and other content are for general wellness, educational, and informational purposes only. You should consult a licensed healthcare provider before making decisions about medical conditions, medications, treatment, diet, exercise, pregnancy, allergies, or supplement use.

### **5.3 Genetic, DNA, Methylation, and Test-Related Information**

If you purchase, register, or use DNA Tests, Methylation Tests, or similar testing products, additional test-provider terms, consents, laboratory notices, and privacy notices may apply. Test providers and laboratories may act as IDLife service providers, processors, independent controllers, or separate businesses depending on the product and service. IDLife will use genetic, DNA, methylation, and test-related information only as described in this Privacy Notice, the applicable consent, the applicable test-provider terms, and applicable law.

IDLife does not use genetic information for employment, insurance, credit, housing, or legal-eligibility decisions. IDLife does not disclose genetic test results to Associates unless you direct us to do so, the disclosure is needed to provide a service you requested, or the disclosure is otherwise permitted by law and IDLife policy. Where required by law, you may request access, deletion, consent withdrawal, or destruction of a biological sample held by or for a test

provider, subject to legal and laboratory-retention requirements.

### **5.4 Limits on Sensitive Data Use**

We may use health, wellness, assessment, personalization, genetic, test-related, biometric, and other sensitive information you choose to provide to deliver requested products and services, provide reports, generate product recommendations, personalize customer experience, support customer service, evaluate product safety, comply with law, and market IDLife products and wellness content that may be relevant to your self-identified goals, concerns, and interests. We do not sell consumer health data, genetic information, biometric identifiers, government identifiers, or payment information. We do not disclose detailed health assessment responses, genetic information, or consumer health data to third-party advertising networks for cross-context behavioral advertising unless separately disclosed and authorized where required by law.

## **6. Consumer Health Data Notice**

Some information IDLife collects may be considered "consumer health data" under Washington, Nevada, or similar state laws. Consumer health data may include information that identifies or is reasonably capable of being linked to a person and relates to that person's past, present, or future physical or mental health status, wellness goals, nutrition, supplements, sleep, activity, symptoms, allergies, sensitivities, medications, lab-related information, genetic or test-related information, product recommendations, or information derived from product quizzes, wellness assessments, personalization tools, wearable connections, customer support, or test-related services.

### **6.1 Categories of Consumer Health Data**

Depending on how you interact with IDLife, consumer health data may include wellness profile information, nutrition and supplement information, health goals, lifestyle information, allergy or sensitivity information, medication or supplement information, health-condition information you choose to provide, test-order information, kit status, consent status, sample status, report information, recommendation history, wearable-related information you choose to connect or submit, and related customer-service communications.

### **6.2 Purposes**



IDLife uses consumer health data to provide products and services you request, generate product recommendations, administer test-related services, provide reports, support customer service, evaluate product safety, respond to adverse events or complaints, manage accounts, comply with law, prevent fraud, protect security, and maintain business records.

### **6.3 Sources of Consumer Health Data**

IDLife may collect consumer health data from you directly; from your use of IDLife assessments, quizzes, wellness profiles, personalization tools, Product recommendation tools, test-related services, wearable connections you choose to connect or submit, customer support interactions, and account activity; from IDLife systems and service providers that help provide requested products and services; from test providers, laboratories, technology providers, fulfillment providers, customer support providers, fraud-prevention providers, and communications providers; and from IDLife Associates only where needed to support customer service, product ordering, IDLife business operations, compliance, or services you request.

### **6.4 Specific Affiliates**

IDLife may share consumer health data with the following specific IDLife affiliates, if any, only as described in this Privacy Notice and applicable law: Direct Fulfillment, G8Way Max and Molecular Testing Laboratories. IDLife may also share consumer health data with service providers and processors as described above. IDLife does not sell consumer health data.

### **6.5 Sharing Consumer Health Data**

IDLife may disclose consumer health data to service providers or processors that help provide requested products or services, including technology providers, hosting providers, customer support providers, fulfillment vendors, test providers, laboratories, fraud-prevention providers, professional advisors, and legal or compliance recipients. IDLife does not disclose DNA Test results, Methylation Test results, genetic information, or detailed health questionnaire responses to Associates unless you direct us to do so, the disclosure is needed to provide a service you requested, or the disclosure is otherwise permitted by law and IDLife policy.

### **6.6 Consent, Withdrawal, and Rights**

Where required by law, IDLife will obtain consent before collecting, using, or sharing consumer health data. You may withdraw consent where required by law, but withdrawal may affect IDLife's ability to provide requested products, recommendations, reports, or services. Where applicable law gives you consumer health data rights, you may request access, deletion, withdrawal of consent, a list of categories of consumer health data shared, or other rights required by law by contacting IDLife using the methods in this Privacy Notice.

### **6.7 Use of Consumer Health Data for IDLife Recommendations and Marketing; No Sale; No Health-Facility Geofencing.**

IDLife may use consumer health data and other information you choose to provide through an online assessment, product quiz, wellness profile, personalization tool, customer support interaction, test-related service, or similar feature to identify, recommend, personalize, and market IDLife products, product bundles, Product Subscriptions, wellness content, educational materials, offers, and promotions that may be relevant to your self-identified wellness goals, nutrition habits, lifestyle, supplement use, symptoms, allergies, sensitivities, health concerns, areas of interest, or other information you provide.

IDLife may use this information for first-party personalization and first-party marketing through IDLife-controlled channels, including the IDLife website, account portal, app, email, text message, phone, postal mail, customer service, Associate-supported customer service, and similar IDLife communications, subject to your communication preferences, consent choices, and applicable law.

IDLife does not sell consumer health data. IDLife does not disclose DNA Test results, Methylation Test results, genetic information, detailed health assessment responses, or consumer health data to third-party advertising networks, social media platforms, data brokers, or similar third parties for cross-context behavioral advertising, targeted advertising based on activity across non-IDLife websites or services, or third-party audience building, unless IDLife provides additional notice and obtains consent or authorization where required by law.



IDLife may disclose consumer health data to service providers, processors, vendors, test providers, laboratories, technology providers, customer support providers, fulfillment providers, marketing service providers, communications providers, and professional advisors that help IDLife provide requested products, recommendations, services, marketing communications, customer support, compliance, security, and business operations. Those recipients may use consumer health data only as permitted by their agreements with IDLife, this Privacy Notice, and applicable law.

IDLife does not use geofencing around healthcare facilities to identify or track consumers seeking healthcare services, collect consumer health data from consumers, or send notifications, messages, or advertisements to consumers based on visits to or proximity to healthcare facilities.

Nothing in this Privacy Notice means that IDLife provides medical advice, diagnosis, treatment, cure, mitigation, or prevention of any disease or medical condition. IDLife recommendations and marketing are for general wellness, educational, informational, and product-selection purposes only.

## **7. Cookies, Pixels, Analytics, Session Replay, and Advertising**

We and our service providers may use cookies, pixels, tags, SDKs, local storage, web beacons, session replay, analytics tools, advertising tools, and similar technologies. These technologies help us:

- keep the website and checkout functioning;
- remember preferences and account settings;
- understand website traffic and product interest;
- improve site design, checkout, personalization, and customer support;
- detect fraud, bugs, and security issues;
- measure advertising performance;
- show advertising on other websites or platforms; and
- understand whether emails or ads were opened, viewed, or clicked.

Some of these technologies may be provided by advertising, analytics, social media, email, personalization, or customer-support platforms. Depending on the technology and applicable law, this activity may be considered targeted advertising, cross-context behavioral advertising, sale, or sharing of personal information.

You can manage many cookies through your browser settings. You can also use the cookie banner, privacy preference center, "Your Privacy Choices" link, or "Do Not Sell or Share My Personal Information" link where available. Blocking certain cookies may affect website functionality, account access, checkout, personalization, or Product Subscription management.

### **7.1 Do Not Track and Opt-Out Preference Signals**

Some browsers offer "Do Not Track" signals. Because traditional Do Not Track signals are not a uniform legal or technical standard, IDLife does not respond to traditional Do Not Track signals. However, where required by applicable law, IDLife will recognize legally required opt-out preference signals, such as Global Privacy Control or other legally recognized universal opt-out mechanisms, as requests to opt out of sale, sharing, or targeted advertising for the browser or device sending the signal. You may also use the cookie banner, privacy preference center, "Your Privacy Choices" link, or "Do Not Sell or Share My Personal Information" link where available.

## **8. How We Disclose Information**

We may disclose personal information to the following categories of recipients:

### **8.1 Service Providers and Processors**

We disclose information to vendors that help us operate our business, including Exigo, payment processors, digital wallet providers, financing providers, fulfillment providers, carriers, tax providers, hosting and security providers, fraud-prevention and Social Security verification providers, analytics providers, advertising providers, email and SMS providers, customer service providers, test providers, laboratories, data storage providers, auditors, consultants, and professional advisors.

### **8.2 IDLife Associates**

If you purchase through, are referred by, are assigned to, or interact with an IDLife Associate, IDLife may disclose limited



information to that Associate or related upline or support Associates as reasonably necessary to support ordering, customer service, product education, relationship management, commission calculation, compliance, and operation of IDLife's Associate program and Compensation Plan. This may include name, contact information, account status, order history, Product Subscription status, Customer category, volume or business information where applicable, and related support information.

Associates are independent contractors, not IDLife employees. Associates are required to use personal information only for authorized IDLife business purposes and must comply with the Associate Agreement, Policies and Procedures, privacy obligations, confidentiality obligations, and applicable law. Associates may not change IDLife privacy promises, make unauthorized medical or earnings claims, use customer information for non-IDLife purposes, or collect payment or sensitive information through unauthorized channels.

We do not disclose DNA Test results, Methylation Test results, genetic information, or detailed health questionnaire responses to Associates unless you direct us to do so, the disclosure is needed to provide a service you requested, or the disclosure is otherwise permitted by law and IDLife policy.

### **8.3 Affiliates and Business Partners**

We may disclose information to IDLife affiliates and selected business partners for business operations, promotions, customer service, compliance, product or service delivery, and corporate administration.

### **8.4 Advertising, Analytics, and Marketing Partners**

We may disclose identifiers, device information, internet activity, commercial information, and inferences to advertising, analytics, social media, email, personalization, and marketing partners to measure advertising, improve campaigns, understand product interest, personalize content, and deliver relevant IDLife advertising, subject to applicable law and your privacy choices.

We do not disclose DNA Test results, Methylation Test results, genetic information, detailed health assessment responses, detailed health questionnaire responses, consumer health data, biometric identifiers, government identifiers, full payment information, or payment-card

security codes to third-party advertising networks, social media platforms, data brokers, or similar third parties for cross-context behavioral advertising, targeted advertising based on activity across non-IDLife websites or services, or third-party audience building unless IDLife provides additional notice and obtains consent or authorization where required by law.

Where reasonably available, IDLife configures advertising, analytics, pixels, tags, SDKs, session replay, and similar technologies to avoid transmitting assessment responses, test results, genetic information, detailed health questionnaire responses, payment information, government identifiers, account credentials, or other sensitive information to advertising networks or social media platforms.

### **8.5 Legal, Compliance, Fraud, and Safety Recipients**

We may disclose information to courts, regulators, law enforcement, auditors, attorneys, insurers, investigators, payment networks, fraud-prevention providers, and other parties where we believe disclosure is necessary to comply with law, respond to legal process, enforce agreements, protect rights and safety, investigate fraud, prevent unauthorized activity, or defend claims.

### **8.6 Business Transactions**

We may disclose information in connection with a merger, acquisition, financing, reorganization, bankruptcy, sale of assets, or similar business transaction.

### **8.7 With Your Consent or Direction**

We may disclose information for other purposes disclosed to you at the time of collection or with your consent or direction.

## **9. IDLife Associates and Lineage Reports**

If you are an IDLife Associate, Customer, or VIP Customer, certain information may be included in Associate reports or systems to support IDLife's direct-selling business, Compensation Plan, commission calculations, customer support, product ordering, compliance, and training. This may include name, contact information, account status, sponsor information, rank or recognition level where applicable, volume, sales statistics, order history, Product Subscription status, and related business information.



Associates who receive this information must use it only for authorized IDLife business purposes and must comply with their Associate Agreement, IDLife Policies and Procedures, confidentiality obligations, privacy obligations, and applicable law. Associates may not make medical claims, alter IDLife refund or Product Subscription terms, change IDLife privacy promises, collect payment information through unauthorized channels, or use customer information for unauthorized purposes.

## **10. Sale, Sharing, Targeted Advertising, and Opt-Out Choices**

IDLife does not sell personal information for money. However, some state privacy laws define "sale," "sharing," or "targeted advertising" broadly enough to include certain disclosures to advertising, analytics, social media, or marketing technology providers.

In the past 12 months, we may have disclosed identifiers, device information, internet activity, commercial information, and inferences to advertising, analytics, and marketing partners for targeted advertising, cross-context behavioral advertising, campaign measurement, and similar purposes.

You may opt out of sale, sharing, or targeted advertising by using the cookie banner, the privacy preference center, the "Your Privacy Choices" link in our website footer, the "Do Not Sell or Share My Personal Information" link where available, legally recognized opt-out preference signals where required, or by contacting us at [compliance@idlife.com](mailto:compliance@idlife.com).

Opt-out choices may be browser-specific or device-specific. If you clear cookies, use another browser, use another device, or are not logged into your IDLife account, you may need to renew your choice.

### **10.1 Health and Assessment Data**

IDLife may use information you provide directly to IDLife through assessments, quizzes, wellness profiles, personalization tools, customer support, product interest, and order history to recommend and market IDLife products and wellness content to you through IDLife-controlled channels. IDLife does not sell consumer health data and does not disclose DNA Test results, Methylation Test results, genetic information, detailed health assessment responses, or consumer health data to third-party advertising networks, social media platforms, data brokers, or similar third parties for cross-context behavioral advertising, targeted advertising

based on activity across non-IDLife websites or services, or third-party audience building, unless IDLife provides additional notice and obtains consent or authorization where required by law.

## **11. VIP Programs, Promotions, Discretionary Credits, and Financial Incentives**

IDLife may offer VIP Customer pricing, discounts, limited-time promotions, coupon codes, samples, discretionary IDRewards, Reward Credits, IDLife Cash, birthday credits, goodwill credits, customer-service credits, introductory offers, bundles, or other promotional benefits from time to time. These programs may involve collection and use of personal information such as name, contact information, account information, order history, Product Subscription status, product preferences, promotion eligibility, and communications.

Product Subscriptions are optional convenience orders and do not automatically create additional discounts, rewards, credits, commissions, qualification, or other benefits unless IDLife issues current written promotion terms stating otherwise. Loyalty Points, Free VIP, Give \$10/Get \$10, automatic second-purchase gifts, automatic birthday gifts, automatic referral rewards, automatic shipping benefits, and similar automatic benefits are not active standard benefits unless IDLife separately issues current written promotion terms.

Some privacy laws may treat discounts, promotions, credits, or price differences as financial incentives or price/service differences. The value of personal information involved is reasonably related to the value of the benefits, products, services, discounts, promotions, and program administration provided. You may opt in by signing up for the applicable program or offer, and you may withdraw by cancelling the program, changing account settings, or contacting IDLife, subject to any applicable promotion terms and legal requirements.

## **12. Retention**

We retain personal information for as long as reasonably necessary for the purposes described in this Privacy Notice, including to provide products and services, manage accounts, process transactions, support Product Subscriptions, provide recommendations, comply with law, resolve disputes, enforce agreements, maintain records, prevent fraud, and support legitimate business operations.



Retention periods vary by information type and context. For example:

- account and order records may be retained while your account is active and for a period afterward for tax, accounting, fraud-prevention, chargeback, and legal purposes;
- Associate records may be retained during the Associateship and for a period afterward to support tax reporting, compensation, compliance, legal claims, and operation of IDLife's Associate program;
- Product Subscription consent, renewal, cancellation, and price-change records may be retained for as long as needed to demonstrate compliance and resolve disputes;
- health, wellness, genetic, biometric if collected, consumer health data, and test-related information may be retained as needed to provide requested products, reports, recommendations, support, safety review, compliance, and legal obligations, subject to applicable consents and provider policies;
- customer service communications may be retained to resolve issues, improve service, train personnel, and maintain business records;
- website analytics, cookies, and session-replay data are retained based on the tool, cookie setting, and business purpose; and
- de-identified or aggregated information may be retained without identifying you.

We may retain information longer where required or permitted by law, litigation hold, audit, fraud prevention, security incident investigation, payment network rule, tax requirement, regulatory requirement, or enforcement of agreements.

### **12.1 De-identified and Aggregated Information**

IDLife may de-identify, aggregate, or anonymize information and use it for analytics, research, product development, compliance, business intelligence, and operational purposes. Where IDLife maintains information as de-identified, IDLife will maintain and use it in de-identified form and will not

attempt to re-identify it except as permitted by law, such as to test whether de-identification processes are effective. IDLife requires recipients of de-identified information to comply with applicable legal restrictions.

## **13. Security**

We use administrative, technical, and physical safeguards designed to protect personal information. These safeguards may include encryption, access controls, role-based permissions, network and system monitoring, logging, vendor review, workforce confidentiality obligations, incident-response procedures, and security controls supported by technology providers.

### **13.1 Payment Security**

Payment information must be entered only through IDLife-approved secure payment channels. IDLife does not ask customers or Associates to send full payment-card numbers, CVV codes, bank account information, or similar sensitive payment information by email, text message, direct message, social media, or other unsecured channels. IDLife does not store full payment card numbers, CVV/security codes, or full magnetic-stripe or chip data in IDLife-controlled company systems.

### **13.2 Security Incidents**

If IDLife discovers a security incident involving personal information, IDLife will investigate and provide notices to affected individuals, regulators, payment networks, consumer reporting agencies, or other parties as required by applicable federal, state, local, territorial, or other law. Where applicable, this may include state and territorial breach-notification laws, payment-card rules, and federal health-data breach-notification requirements.

No website, application, network, system, or transmission is completely secure. You are responsible for keeping your account credentials confidential and for notifying us promptly if you believe your account or information has been compromised.

## **14. Your Privacy Choices**

Depending on your location and how you interact with us, you may have choices including:



- accessing or correcting account information through your account settings;
- changing communication preferences;
- unsubscribing from marketing emails using the link in the email;
- opting out of text messages by following the instructions in the message;
- changing browser cookie settings;
- using the cookie banner, privacy preference center, "Your Privacy Choices" link, or "Do Not Sell or Share My Personal Information" link where available;
- cancelling Product Subscriptions through your IDLife account or by contacting us;
- requesting access, correction, deletion, portability, restriction, or withdrawal of consent for personal information where required by law;
- opting out of sale, sharing, targeted advertising, or certain profiling where required by law;
- exercising consumer health data rights where required by law; and
- appealing a privacy-rights decision where required by law.

To make a privacy request, email [compliance@idlife.com](mailto:compliance@idlife.com), contact IDLife at the phone number listed in this Privacy Notice, use any privacy request form IDLife makes available, or use another method IDLife designates. We may need to verify your identity before fulfilling the request. Verification may include matching information you provide with information we maintain. Authorized agents may submit requests where permitted by law, but we may require proof of authorization and may ask you to verify your identity directly.

## 15. U.S. State and Territory Privacy Rights

Depending on where you live and how you interact with IDLife, applicable law may give you rights to confirm whether IDLife processes your personal information, access personal information, correct inaccurate personal information, delete personal information, obtain a portable copy of personal information, opt out of sale, sharing, targeted advertising, or

certain profiling, limit or withdraw consent for certain sensitive personal information uses, appeal a denied privacy request, and not be discriminated against for exercising privacy rights.

IDLife will honor privacy rights required by applicable federal, state, local, territorial, or other law. If your state or territory gives you additional rights, IDLife will provide those rights to the extent required by law. Some rights are subject to exceptions, including where information is needed to complete a transaction, provide a requested product or service, maintain security, prevent fraud, comply with legal obligations, resolve disputes, exercise legal rights, maintain internal records, or comply with tax, accounting, chargeback, regulatory, or direct-selling obligations.

We will respond to verified requests within the time required by applicable law. If we deny a request, we will explain the decision where required. You may appeal by replying to our decision email or by emailing [compliance@idlife.com](mailto:compliance@idlife.com) with the subject line "Privacy Appeal."

## 16. California Notice at Collection

This section applies to California residents and supplements the rest of this Privacy Notice.

In the preceding 12 months, we may have collected the categories of personal information listed in Section 2 above. We collect those categories from the sources listed in Section 3, use them for the purposes listed in Section 4, retain them as described in Section 12, and disclose them to the recipients listed in Section 8.

### 16.1 Categories Collected and Disclosed

- **Identifiers:** disclosed to service providers, Associates, affiliates, business partners, payment and fraud providers, fulfillment providers, advertising and analytics partners, and legal/compliance recipients.
- **California Customer Records Information:** disclosed to service providers, payment processors, fraud providers, tax providers, fulfillment providers, Associates where appropriate, and legal/compliance recipients.
- **Protected Classification Information:** used only as needed for requested services, personalization, compliance, or lawful business purposes and disclosed to service providers as needed.



- **Commercial Information:** disclosed to service providers, Associates, affiliates, payment processors, tax providers, fulfillment providers, advertising and analytics partners, and legal/compliance recipients.
- **Biometric Information:** IDLife does not currently seek to collect biometric identifiers or biometric information for identification or authentication. If collected in the future, it will be disclosed only to service providers or other recipients as needed for the feature or purpose disclosed to you and with consent where required.
- **Internet or Electronic Network Activity:** disclosed to hosting providers, analytics providers, advertising partners, security providers, session-replay providers if used, and other service providers.
- **Geolocation Data:** disclosed to service providers as needed for requested services, personalization, fraud prevention, analytics, or security.
- **Sensory Information:** disclosed to customer service providers, quality assurance providers, event providers, and legal/compliance recipients.
- **Professional or Employment-Related Information:** disclosed as needed for Associate onboarding, payments, tax reporting, compliance, and IDLife business operations.
- **Education Information:** disclosed only if you provide it and as needed for the relevant purpose.
- **Health, Genetic, Wellness, Consumer Health, and Test-Related Information:** disclosed to service providers, test providers, laboratories, technology providers, customer support providers, professional advisors, and legal/compliance recipients as needed to provide requested services and comply with law. We do not knowingly disclose this information for targeted advertising.
- **Inferences:** disclosed to service providers, analytics providers, advertising partners where permitted, Associates where appropriate, and business partners.

- **Sensitive personal information:** disclosed only as needed for the disclosed purposes, with consent where required, and subject to applicable legal restrictions.

## 16.2 California Sale or Sharing

We do not sell personal information for money. In the preceding 12 months, we may have shared identifiers, internet activity, commercial information, and inferences with advertising, analytics, social media, and marketing partners in a manner that may be considered a sale or sharing under California law. You may opt out through the cookie banner, privacy preference center, "Your Privacy Choices" link, legally recognized opt-out preference signals where required, or by emailing [compliance@idlife.com](mailto:compliance@idlife.com).

We do not knowingly sell or share personal information of anyone under 18.

## 16.3 California Sensitive Personal Information

We use sensitive personal information to provide requested products and services, process transactions, maintain accounts, provide recommendations you request, administer tests, ensure security, prevent fraud, verify identity, comply with law, and support other permitted business purposes. Where California law gives you the right to limit certain uses of sensitive personal information, you may submit a request by emailing [compliance@idlife.com](mailto:compliance@idlife.com).

## 16.4 California Shine the Light

California Civil Code Section 1798.83 permits California residents to request information about certain disclosures of personal information to third parties for their direct marketing purposes. To make a request, email [compliance@idlife.com](mailto:compliance@idlife.com) with the subject line "California Shine the Light Request" and include your name, email address, and postal address.

## 17. Texas Privacy Rights

Texas residents may submit requests to access, correct, delete, obtain a copy of personal data, and opt out of targeted advertising, sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects. Texas residents may also appeal a decision by emailing [compliance@idlife.com](mailto:compliance@idlife.com) with the subject line "Texas Privacy Appeal."



## 18. Nevada Privacy Rights

Nevada residents may opt out of future sales of covered information under Nevada law. We do not currently sell covered information for monetary consideration as defined by Nevada law. Nevada residents may submit opt-out requests to [compliance@idlife.com](mailto:compliance@idlife.com).

Nevada residents may also have rights relating to consumer health data where applicable. You may exercise those rights using the request methods in this Privacy Notice.

## 19. Washington and Similar Consumer Health Data Rights

Washington residents and residents of other states with consumer health data laws may have additional rights relating to consumer health data, including rights to confirm collection, access consumer health data, delete consumer health data, withdraw consent, and receive information about categories of consumer health data shared and categories of third parties or affiliates with whom consumer health data is shared. You may exercise those rights using the request methods in this Privacy Notice. IDLife will respond as required by applicable law.

## 20. Children and Minors

The Services are intended for adults 18 and older. We do not knowingly collect personal information from anyone under 18. If you believe a minor has provided personal information to IDLife, contact us at [compliance@idlife.com](mailto:compliance@idlife.com) and we will take reasonable steps to delete the information where required by law.

## 21. Third-Party Websites and Services

The Services may link to third-party websites, platforms, payment services, social media, test providers, laboratories, digital wallet providers, financing providers, or other services. Their privacy practices are governed by their own notices, not this Privacy Notice. Review their terms and privacy notices before providing information to them.

## 22. Changes to This Privacy Notice

We may update this Privacy Notice from time to time. The updated version will be posted on the Services with the updated effective date. Your continued use of the Services after an update means you acknowledge the updated Privacy Notice, subject to any additional consent required by law.

## 23. Contact Us

For privacy questions or requests, contact:

IDLife, LLC  
Attn: Compliance Department  
10825 John W. Elliott Dr., Suite 100  
Frisco, Texas 75033  
Email for privacy requests: [compliance@idlife.com](mailto:compliance@idlife.com)  
General email: [info@idlife.com](mailto:info@idlife.com)  
Phone: 972.987.4430