

Privacy Policy

Effective Date: 15 April 2024

This Privacy Policy (the “Policy”) describes how Barebells Functional Foods Canada Ltd., including its subsidiaries and affiliates (“Company”), collect and use personal information about you when you visit our site www.barebells.ca (“Site”); make purchases; contact or correspond with us; sign up for news, invites and offers; speak with us by telephone or otherwise interact with us as a customer or prospective customer. By engaging in any of these activities, you agree to our collection, use and disclosure of your personal information in accordance with this Policy.

The Site, and this Policy are intended for Canadian customers only. You cannot order products through this Site if you do not have a Canadian delivery address.

Except as otherwise provided by law, by “personal information”, Company means information that directly identifies you (such as your name, address, or email address), or information that, alone or together with other available information, can be used to identify you (such as, in some cases, an IP address or persistent device identifier). Personal information does not include aggregated information, or any personal information that has been de-identified through the removal of potentially identifying details, such that it is reasonably foreseeable in the circumstances that the data may no longer be identified with a particular individual.

In this Policy, “you” means any person who visits our Site, makes purchases, contacts or corresponds with us, sign ups for news, invites, competitions and offers or speaks with us by telephone.

This Policy contains important information about our commitment to the protection of your personal information, including:

- [The sources from which we may collect your personal information](#)
- [The types of personal information that we collect, use and disclose, and the purposes for which we do so](#)
- [The parties with whom we may share, or to whom we may disclose your personal information, and the purposes for doing so](#)
- [The extent to which we may process sensitive personal information](#)
- [Your rights with respect to your personal information, including rights of access, correction and deletion](#)
- [Our use of cookies and other tracking technologies, and your choices with respect to these technologies](#)
- [Our retention of your personal information](#)
- [The measures that we take to safeguard your personal information](#)
- [The privacy terms that govern third party websites to which we may link](#)
- [The circumstances in which your personal information may be stored or processed outside of Canada](#)
- [The ways in which this Policy may be revised, and how that may affect your personal information](#)
- [How you can contact us with any questions about our processing of your personal information and your rights and choices with respect to such processing](#)

Company does not process personal information for purposes other than those set out in the Policy, unless further consent is obtained, or where otherwise required or permitted by law.

1. SOURCES FROM WHICH WE COLLECT PERSONAL INFORMATION

As noted above, personal information is something that relates to an identified or identifiable natural person, i.e. any type of data that can be associated with a person. Examples include names, email addresses or phone numbers if they can be associated to a certain living physical person, but also e.g., a photo in which the person can be recognized. This Policy sets forth the practices that Company intends to follow with respect to such personal information, as well as other information that can be used to identify a visitor's computer or device.

Company collects personal information from the following sources:

- Directly from you. For example, when you contact or request information from us including via the Site, make an online purchase, or create an account.
- Third Parties, including through service providers providing services to the Company or otherwise acting on the Company's behalf. For example, service providers that Company uses, analytics companies, advertising networks, email marketing platforms and cooperatives, and other third parties that Company chooses to collaborate or work with.
- Social media platforms and networks. For example, companies that you use in connection with the Site, or that share or allow you to share information with Company, such as Meta. For more information on network privacy practices, please review the privacy policies and settings of the social media platforms and networks that you use.
- Using cookies and automatic collection methods. Company and its service providers may collect information from the computer, tablet, phone, or other device that you use to access our Site, or that you use to open an email or click on an advertisement from Company. Methods Company uses include: cookies (which may be session-based or persistent, and are typically small data files that are stored on your hard drive or in connection with your Internet browser); web beacons or tags; flash cookies or Local Stored Objects; any other technologies. For more information, see [Cookies and Other Tracking Technologies](#), below.

2. WHAT PERSONAL INFORMATION DO WE PROCESS AND FOR WHICH PURPOSES?

We generally collect, use and disclose personal information to serve our customers, manage and operate our business and design and market our products and services. Company collects different types or categories of personal information from you depending on the way you interact with us. For example:

- **Purchase of products or services.** If you purchase products or services from us, we will process your personal information in order to complete your order and to fulfil our contractual obligations to you.

o Relevant personal information is first and last name, delivery address/billing address, telephone number, e-mail address, order information, payment details, credit card information and payment reference number. IP address in relation to order data.

- **Participation in events.** If you have agreed to our terms and conditions for participation in an event organised by us, e.g. a training session, a trip or a seminar, you will have provided us with personal information such as:

o Contact details (e.g. name, address, email address and phone number).

We need this information to organise and host the event in a safe manner. If you provide us with health or other information we will also ask for your explicit, specific and informed consent for such processing. Because we take photos and films during our events for future marketing purposes, as agreed in the terms and conditions we may also collect, edit and distribute photos and films on social media in which you are visible and identifiable subject to your acceptance to exploit your image unless you showed yourself in a conspicuously public position on the occasion of those events.

- **Participation in prize draws.** If you choose to participate in a prize draw or competition that we arrange, you will have provided us with personal information such as:

o Your name, delivery address, phone number, email address, social media handle, age and possibly a contribution (e.g., a photo or film) in which you can be identified. We use this information to complete the prize draw/competition (e.g., for identification and age checks or to select a winner and for distribution of the relevant benefit or prize) and in some cases, also as the basis for further prize draw/competitions.

With your consent, further compatible use of such information may also be stated in the terms and conditions and the information we provide before the competition. If the prize is a trip, we may also process information such as:

o Citizenship and health information (e.g., allergies) that we need to know for safety reasons (when applicable).

If you do not want us to process data for the above purposes, we may not be able to organise your participation in a draw or competition.

- **Sponsorship, etc.** If you have entered into an agreement with us regarding sponsoring an event, manufacturing of products or other professional collaboration, you will have provided us with personal information such as your contact details (e.g., name, address, telephone number, title and employer). We use such data in order to be able to fulfil our agreement with you. If you do not want us to process data for the above purposes, we may not be able to fulfil the agreement.

- **News, invitations, etc.** If you sign up for news, invitations and offers (direct marketing), we will process your personal information in order to provide the services you request. We may also send you such communications where otherwise permitted by law.
 - Our direct marketing may be based on profiling, which means that based on certain factors, we can personalise the information you receive from us. We use the following types of personal information to compile a profile:
 - Your gender, your approximate location, your previous purchases, your behaviour on our Site and/or your previous behaviour when you receive direct marketing from us (if we have such information).

Categories of personal information are all data that is collected in association with a purchase (see above) including:

- Email address, location (based on the Company Site at which you register for our marketing communications), all communication that has been sent to you, order history and the emails that you have clicked on, and your interactions with our Site if you have followed a link in any of the emails sent to you.

- **Cookies and similar technologies.** If you visit the Site and accept our cookies, we may collect personal information for example:

- In the form of information about IP address, user-generated data from cookies (e.g. clicks, displayed page, page visits, time spent on the page, products displayed and clicked, orders, average order value, how you access and exit the Site etc.), approximate geographical location, technical data (e.g. type of device, browser settings, time zone, operating system, platform), which is further described in our cookie settings, available through the footer of each page of the Site, and in the [Cookies and Tracking Technologies](#) section of this Policy.

We analyse this information at an aggregate and pseudonymised level for statistical purposes, and for optimisation of our Site to market our products and brands by analysing which parts of our Site is visited most often, and similar.

If you visit the Site and consent to our cookies for personalised advertising, we will use the data collected (IP address, user-generated data from cookies, for example: clicks, displayed page, page visits, products displayed and clicked on, orders, average order value, approximate geographical location), for targeted advertising on third-party social media and search engine platforms such as Meta, Google, YouTube, TikTok, etc. The purpose is to present you with advertising targeted at you based on your behaviour and browsing patterns, based on your interaction with our Site and the data collected about you by the operators of those platforms, at specific points in time and locations for these platforms to increase the effectiveness of our advertising campaigns. Your personal information is shared with such third parties to target advertising on their platforms. They will try to match your profile in their database to determine the optimal time and location (the page on which you are browsing) to display an advertisement

from us, or to identify other users of those platforms to whom we may want to target ads on those platforms. Third party platforms use tracking technologies to identify when a user of their platform has visited our Site after being presented with one of our advertisements on that platform, and provide us with reports to that effect. This allows to assess the effectiveness of our advertising on those platforms. If you do not accept that we track your data for this purpose you can still see our advertisements on other platforms randomly.

- **Customer Service.** If you request customer service from us via our support channels, we will process your personal information in order to assist you with the relevant matter (i.e., your name, email address and other contact details, order details, purchase amount, purchase history, invoice, payment method, our correspondence with you, technical information about devices and operating systems used).
- **Questions and complaints.** If you have contacted us with questions or complaints about our products (not based on an agreement with you), you may have provided us with personal information such as your name, address, email address and phone number. We use this data to answer your questions, investigate product issues, track or report health risks, compensate you when required and prevent fraudulent behaviour, for example through unfounded complaints and claims for compensation.
- **Contacting us.** If you choose to contact us following our general invitation or on your own initiative via one of our general email addresses, with ideas about new flavours, products or promotions or other comments, you provide us with personal information that we use to answer and evaluate the content of your email.
- **Protect our rights.** If it is necessary to protect our rights, as we have a legitimate interest in establishing, exercising and defending legal claims.

Legal requirements and claims, defence of interests

We may process personal information in order to comply with applicable legislation and regulatory requirements, for investigation and law enforcement purposes, and as may be otherwise required or permitted by law. For example, we may need to process your personal information in order to meet statutory requirements (e.g. requirements to keep records or in our reply to a request of yours to exercise your individual rights) and by order of the courts or public authorities (e.g., for tax reasons). We may also be required by law or forced by public interest to process personal information relating to product problems in order to facilitate tracking and monitoring of potential health risks. We may also process personal information to protect our interests and those of our users and customers. See also [With Whom Do We Share or Disclose Personal Information?](#), below.

3. WITH WHOM DO WE SHARE OR DISCLOSE PERSONAL INFORMATION?

From time to time, we may share personal information with affiliated companies or with third party service providers that we have engaged to perform services on our behalf, based on our instructions, such as advertising agencies, marketing agents, legal advisors, logistics and delivery providers, data processing and storage companies or organizations which provide administrative and support services to Company. We will limit our disclosure of your personal information to such third parties to that which is reasonably necessary for the purpose or service for which the third-party service provider is engaged. We will use contractual and other means to provide a comparable level of protection while the information is being processed by such third parties, including limiting such providers to using your personal Information solely to provide us with the specific service for which those providers were engaged, and for no other purpose. You can obtain more information about our policies and practices with respect to the use of personal information by third party service providers by contacting us via the [Contact Details](#).

Note that Company does not collect, process or retain full credit card details. Rather, customers of our eCommerce store process credit card payments directly through a third-party payment processor, Stripe. Inc., which we have selected. A Canadian based company, Stripe processes such payments on behalf of our customers and not as our service provider, and is responsible for the collection and handling of your personal information that it processes when providing its products and services to you. For more information see <https://stripe.com/en-ca/legal/privacy-center>.

Even internally, when and to the extent necessary, your personal information is only accessible by Company employees having a real business need to access the data in order to perform their job function and to the sole extent required by the same. For example, our e-commerce team will have access to only the personal information related to your purchases and our product managers will primarily have access only to personal information contained within incoming questions and complaints about our products.

Personal information may be shared with employees, affiliates and service providers located locate in or outside of Canada or your home province, where it may be subject to the laws of the jurisdiction in which it is stored.

As [noted above](#), we may also use services provided by third-party search and social media platforms to serve relevant Company advertisements on such platforms to you and others. To do this, we may provide to the platform provider a “hashed version” of your email address, IP address or other potentially connecting information, which the provider will attempt to match to a profile you may have with that platform. Hashing is a mathematical operation that applies an equation to information so as to produce an encrypted value that cannot be reversed to reveal the original data. Both Company and the platform run the same one-way hash function on the same data element, for an example, an email address. As a result, when Company provides the platform with the hashed email addresses of a selected group of customers, the platform is able to match the hashed value against the corresponding hashed value for users of the platform, allowing the platform to target Company customers that are users of that platform with relevant advertising, based on demographic factors selected by us, or to assist the platform in identifying platform users displaying similar demographic factors, to which we may direct advertising on that platform. If you do not have a profile with that platform, the hashed identifier is meaningless to the platform. For further information about this process, the platform’s use of your personal information, and your options for managing those uses, please consult the privacy policy and related documentation of the platforms to

which you are registered. To opt-out of the use by Company of the personal information we hold about you for such purposes, you may manage your preferences through our Cookie Settings.

Company may transfer your personal information where reasonably required in the context of a sale, merger, reorganization or amalgamation of all or part of our business or the insurance or securitization of our assets. In any such case, the recipient parties will be contractually required to keep the information confidential and use it only for the purposes of the transaction, or proposed transaction, in question. In the event a business transaction is completed, assignees or successors of our business or assets may use and disclose personal information obtained from Company only for the purposes set out this Policy, unless further consent is obtained.

We may also disclose your personal information to other third parties as required or permitted by law, such as:

- to government bodies and law enforcement agencies, pursuant to warrant, order or statutory requirement;
- in connection with any legal proceedings or prospective legal proceedings involving Company;
- to otherwise establish, exercise or defend our legal rights (including providing information to third parties for the purposes of fraud prevention and reducing credit risk, as permitted by law).

We do not otherwise share, give, rent or sell personal information to any third parties, unless additional consent is obtained.

4. DOES THE COMPANY PROCESS SENSITIVE PERSONAL INFORMATION?

In some cases we collect and process for a limited period of time certain health-related data for safety reasons, such as information about allergies or other health conditions. We may need this information when, for example, we are investigating a product complaint, organising travel, training events and similar.

Such data will only be processed after we have received your informed consent and will always be deleted as soon as the specific individual purpose for which it was collected is no longer applicable.

When contacting us on your own initiative, such as to make an inquiry or complaint, please share only personal information that is absolutely necessary for us to handle your request.

5. WHAT ARE YOUR RIGHTS?

Subject to the applicable law in your province of residence, you have the following rights:

- **Right of access:** At any time, you may request access to your personal information. Upon request, we will provide information about what personal information we store about you in a commonly used electronic format.
- **Right to correction:** You have the right to have incorrect personal information corrected and to have incomplete personal information completed.
- **Right to deletion:** You can request that we delete your personal information. Please note that this is not an unconditional right, and our obligation to delete personal information is subject to legal and

contractual restrictions. Therefore, an attempt to exercise the right may not lead to a measure from us.

- **Right to withdraw consent:** At any time, subject to conditions in this policy and applicable laws, you may withdraw your consent to any processing (including continued retention) by us of your personal information. As with the right to deletion, please note that this is not an unconditional right, and our obligation to delete personal information is subject to legal and contractual restrictions. Therefore, an attempt to exercise the right may not lead to a measure from us. If you want to exercise this right contact us by using the contact details set out below. If you want to withdraw your consent as regards direct marketing and profiling, you can do this by following the instructions in one of our news communications or by contacting us using the contact details set out below.
- **Right to data portability:** If you live in the Province of Quebec, you have the right to have the personal information that you have provided to us transferred directly to another person or body authorized by laws to collect such information, in a structured, generally used and machine-readable format, unless doing so raises serious practical difficulties.
- **Right to opt-out of direct marketing and profiling;** You always have the right to object to your personal information being used for direct marketing, including profiling. Such an objection can be made at any time by following the instructions in one of our news communications or by contacting us using the contact details set out below.
- **Right to opt-out of interest-based advertising:** To provide you with more interesting and customized information, promotions, and advertising, we disclose, through cookies and other tracking technologies ([see below for more details on these technologies](#)) personal information to third-party providers of advertising services who may use such personal information for their own purposes or to serve other customers, including to display our advertisements to you on sites and services that we do not operate. Access the [Cookie Setting](#) to adjust your preferences. You may be able to control social media and search engine advertising by the Company through the settings of the social media and search platforms that you use.

The rights and options described above are subject to limitations and exceptions under applicable law. We will respond to your requests to exercise your privacy rights in accordance with applicable law. We may request additional information from you to verify your identity and complete your request. If we deny your request, we will explain why.

If you have any questions or wish to exercise any of your rights, please contact our Data Privacy Officer (See [Contact Details](#)) identifying yourself and the precise purpose of your request (proof of identity may be requested).

If your request is submitted electronically, information will also be provided electronically where possible, unless you specifically request otherwise.

In the event that the Company is unable to fulfil your request, you will be informed of the reasons for this. Please be aware that you may have a right to appeal our decisions under applicable laws.

6. COOKIES AND TRACKING TECHNOLOGIES

When you visit our Site, we may use certain automated tools to provide you with a more personalized browsing experience, better understand your needs, provide you with content that is most relevant to you and monitor trends respecting the usage of our site and apps.

One such technology that we use are called cookies. A cookie is a small data file that is sent to your browser from a web server and stored on your device that identifies your browser/device/IP address – but not you as an individual – to our computers each time you visit our Site.

We use cookies on the pages on the Site where you are prompted to log in or that are customizable. If you have previously registered with our Site, these cookies (1) may let us know who you are, and (2) will provide us and our service providers with information that we will use to personalize our website in accordance with your preferences and interests. As outlined below, you may set your Web browser to notify you when you receive a cookie or to not accept certain cookies (these controls are typically found in the privacy settings for your browser). You do not need to enable non-essential cookies to visit our Site; however, if you decide not to accept such cookies from our website, you may not be able to take advantage of all of the features of our website.

Our Site may also use a technology various called "tracer tags", "web beacons" or "tracking pixels". These serve a similar purpose to cookies and allows us to record simple user actions related to our Site and to email communications received from us, to help us determine the usage and effectiveness of our Site and email communications. These are automatically loaded to your browser/device when you visit the Site or open an html format email message from us, thereby letting us know if a certain page was visited or an email message was opened. This technology allows us to understand which pages you visit on our website. This technology is used to help us optimize and tailor our website for you and other future visitors to our website. These may also be used by third party partners, such as social media networks, who use the technology to measure the effectiveness of the ads we place on such networks.

We also work with third-parties such as ad networks, search engines, social media platforms and other advertising companies that use their own tracking technologies (including cookies and pixels) on our Site and other across the Web in order to provide you with tailored advertisements on our behalf on third party platforms and websites across the Internet. These companies may collect information about your activity across your different devices on our Site and third-party platforms and websites (such as web pages you visit and your interaction with our advertising and other communications) and use this information to make predictions about your preferences, develop personalized content and deliver ads that are more relevant to you on third party websites and apps. This information may also be used to evaluate our online advertising campaigns. See [above](#) for further information and your choices with respect to these activities.

See Right to opt out of interest-based advertising above for details on the ways that you can opt out of behavioral advertising and tracking with respect to our Site.

We may also use a third party such as Google Analytics to help us gather and analyze information about the areas visited on our Site (such as the pages most read, time spent, search terms and other engagement data) in

order to evaluate and improve the user experience and the convenience of the websites. For more information or to opt-out, see Google Analytics help page [Safeguarding Your Data](#). Some of these tracking tools are used only for purposes necessary for the operation of the Site such as to ensure access and stable operation of the Site. However, you may control the setting of cookies in several ways.

One way is to exercise your choices through the cookie settings that appear when you first visit our Site, and that are always available through a link in the footer of each page of the Site. Another way is to opt-out of the use of cookies for behavioural advertising and tracking, as set out above.

In addition, you may also manage your cookie preferences through your internet browser. These cookies can be session cookies (in which case the cookie will be automatically deleted when the browser is closed) or persistent cookies (in which case the cookie will remain stored in the terminal until its expiration date).

Follow the links below for instructions on how to change your browser settings from some of the most common browser providers (note that these are links to third-party Sites over which we have no control):

[Microsoft Internet Explorer](#)

[Safari](#)

[Firefox](#)

[Google Chrome](#)

By limiting cookies you may not be able to access all parts of our Site as some features of the Site depend on cookies.

By clicking on Cookie Settings, you will find a detailed list of the cookies we use on our Site. If you have consented to all cookies, you can withdraw your consent (except for the essential cookies) by going to our Cookie Settings.

Except for essential cookies (those necessary to operate the site), blocking the installation of cookies does not prevent you from using the Site. You can also use the Cookie Settings to adjust the use of cookies.

The retention period of the user's choice in setting browser preferences respecting cookies is six (6) months. For information on how to adjust your browser settings to delete or control cookies, please visit <http://www.aboutcookies.org/>.

If you have any further questions, please feel free to contact our Data Protection Officer using the [Contact Details](#) below.

7. RETENTION

Company will only retain personal information to the extent necessary for the purposes identified in this Policy, after which it will be securely destroyed or irreversibly erased or de-identified.

Personal information may be stored “in the cloud” or otherwise outside of Canada, where it may be subject to the legal regime of the jurisdiction in which it is stored.

As noted above, under the Your Rights section, you may cancel your registration, request deletion of your personal information, or otherwise withdraw consent to the use of that information. Should you do so, note that, in some cases, Company may nonetheless retain some of your personal information for a reasonable period for legal, administrative or compliance purposes. For more details on the limitations of such rights, see [What Are Your Rights](#), above.

8. SECURITY AND FRAUD

Company has implemented appropriate technological, physical and contractual security measures designed to help safeguard your personal information against loss or theft, as well as against unauthorized access, disclosure, copying, use or modification. Company do not authorize Company employees or our service providers to access or use this information unless they have a need to know it in connection with performing their employment duties or providing services to Company. Company does not use credit card information for any purpose other than to process payment for sales, and does not provide your credit card information to anyone other than the financial services institutions and payment processors responsible for the confidential processing of your payment.

While Company will continue to exercise diligence and use measures to protect the security of this Site, Company cannot warrant that all internet communications will be secure.

9. LINKS TO THIRD PARTY SITES

Company’s site may provide links to other Internet sites, content or videos (embedded or direct links) maintained by third parties. Company is not responsible for the sites, content, or videos accessed via the links, and Company has not reviewed the privacy practices of those third parties.

10. INTERNATIONAL TRANSFERS

Your Personal Information may be transferred to and stored/processed elsewhere in Canada and any other country or jurisdiction at our sole discretion. The laws that apply to the use and protection of personal information in Canada or other countries or jurisdictions in which we transfer or process personal information may be different than the laws and protections in your country.

11. UPDATES TO THIS POLICY

Company may make changes to this Policy from time to time, and may apply any changes to information previously collected, as permitted by law. When we make changes to the Policy we will revise the “last updated” date at the top of the Policy. You should check back here periodically to find out if any changes have been made. If we make substantial changes we will, as appropriate, prominently post these changes to our Site or notify registered Customers directly. If you disagree with any change to the Policy, you may close your account (if applicable) and refrain from using our services (including refraining from visiting the Site), or in some cases, by opting out. Continuing to use our services, including our Site, after we post or communicate a change signifies that you consent to the revised terms of the Policy.

12. CONTACT DETAILS

If you have any questions or comments about this notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, please do not hesitate to contact us through the office of our Data Protection Officer at:

Postal address: Barebells Functional Foods Canada Ltd. Located at 200-1630 Ness Avenue Winnipeg MB R3J 3X1.

Email: dpo@vitaminwell.com