OK CAPSULE INC.

PRIVACY POLICY

Effective Date: January 1, 2021.

We at OK Capsule Inc. ("OK Capsule," "Capsule," "we," "us," or "our") provide this privacy policy ("Privacy Policy") to help inform you about how we collect information, how we use the information, and with whom we disclose such information. This Privacy Policy relates to our online services (the "Services"), which are available to you through a variety of platforms, including our website www.okcapsule.com (the "Website"), mobile application, and other interaction by telephone, e-mail, chat or other media (collectively, the "Platform").

1. The Information We Collect

1.1. Information You Provide to Us

We collect information you provide to us. For example, we collect information when you sign up, login, use client portal, email us, call us, or place an order. Such information may include your name, e-mail address, date of birth, mailing address, and phone number and other information. Our tech Platform also allows us to provide a B2B custom, private-labeled supplements to end-use customers. Such information collected may include personally identifiable information, personal data or personal information

Additionally, when you login or utilize our client portal for access to our Platform or for your account management, you may also voluntarily provide us with additional information about yourself such as your nutritional, or supplement interests, health and wellness, including but not limited to, short-term and long-term health goals, lifestyle, views about health/wellness, gender, and other demographic information. You may also voluntarily provide us with information about your health and diet, and vitamin supplements ordered, herbal and nutraceutical needs, or product, service and delivery preferences.

1.2. Information We Collect Automatically

We automatically collect information about you when you access or use the Platform or place an order. Such information may include your IP address, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Website you visit, order information, device identifier, and other similar information concerning your use of the Services and Platform.

We may use cookies or similar technologies to help us collect information and to enhance your experience using the Services. Cookies are small packets of data that a website stores on your browser so that your computer will "remember" information about your visit. We use both session and persistent tracking technologies. For example, we collect information on our Platform through session cookies, which disappear when you close your Internet browser, and through persistent cookies, which remain on your computer until they are deleted. If you do not want the Platform to place a cookie on your hard drive or mobile device, you may be able to turn that feature off on your computer or mobile device. However, the Services may not function properly and your experience with the Platform and Services may be impacted. Additionally, we use data analytics tools like <u>Google Analytics</u> and other third-party technologies to understand how users interact with our advertisements and Services. For more information, you can visit www.google.com/policies/privacy/partners/ ("How Google Uses Information From Sites Or Apps That Use Our Services").

For more information about cookies and how to disable them or to opt out of receiving certain advertising tailored to you from third parties, please visit:

- http://www.aboutads.info/choices/
- https://policies.google.com/technologies/ads
- http://optout.networkadvertising.org/?c=1#!%2F
- http://www.networkadvertising.org/choices/
- www.allaboutcookies.org/manage-cookies/

Options you select are browser and device specific.

1.3. Information from Other Sources

We may receive information from third parties that provide us with information about you from online and offline sources. These third parties may use cookies or other similar technologies. For example, we may use third party web analytics tools to help us provide you with a better experience, determine your interest in our products, and improve the quality of our offerings. Additionally, such third parties may collect and combine your email address with other information they have access to solely so that we may serve relevant marketing offers to you via direct email. OK Capsule does not share any of your personal information with third parties.

1.3.1. Digital Advertising

We may partner with third party companies that collect data from our Services, as well as from other non-affiliated websites and mobile apps over time in order to infer what interests you to deliver more relevant advertising to your browser or device, as well as browsers and devices associated with it. These partners, however, do not collect or receive information about your responses to assessment questions answered on the Platform for advertising or marketing purposes. This type of advertising for your browser, and your choices about it for companies that participate in the Digital Advertising Alliance's ("DAA") WebChoices tool, you can visit <u>www.aboutads.info/choices</u>. To learn about your choices about this activity on your mobile device for companies that participate in the DAA's AppChoices you can download the appropriate version of the app from <u>www.youradchoices.com/appchoices</u>.

We adhere to the DAA's Self-Regulatory Principles. When you exercise choice through these tools, data will no longer be collected from that browser or device for interest-based advertising, and data collected from associated browsers or devices will not be used on the browser or device for interest-based advertising on the browser or device where choice was exercised. Note that you will still see advertising, but that advertising may be less relevant to your interests. If you use multiple browsers or devices, clear your cookies, or reset your device identifier, you may need to exercise choice again.

1.4. Payment Information

When you sign up to become a client or place an order through our Platform, you provide certain payment information. Such information may include a debit card number, credit card number, and similar information (collectively, the "Billing Information") in order to complete your transaction. Billing Information is collected and processed through third-party vendors pursuant to the terms and conditions of their privacy policies and terms of use.

2. How We Use the Information

We use the information we collect to process transactions; provide you with the Services; solicit your feedback; provide information about our products, including individualized, premium-grade supplement packets, Services, or otherwise market to you; track fulfillment processes, such as logistics, warehousing, packaging, and delivery; inform you about upcoming events, supplements, herbal and nutraceutical remedies and special promotions; analyze use of the Services; improve our Services; regulatory event reporting; or otherwise as may be disclosed at the time of collection.

3. How We Share the Information

We may share your information in the following situations:

- With service providers to provide services such as custom branded supplement or wellness services, delivery services, marketing assistance, information technology support, and customer service. These service providers will have access to the information only as necessary to perform their functions and to the extent permitted by law. We do not allow these service providers to share your information with others without our authorization or to use it for their own purposes;
- With our affiliates and subsidiaries;
- Third Party Marketing Vendor for Commercial Purposes
- In the event of a business transaction or sale of all or part of our assets, including at bankruptcy;
- In response to a court order, subpoena, warrant, or as otherwise required to by law;
- To other parties with your consent or as disclosed at the time of collection; and
- To protect our rights and the rights of third parties.

We may also aggregate information together in order to operate, maintain, manage, and improve the Services. We may share this aggregated data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics in order to describe our products and Services to current and prospective business partners and to other third parties for other lawful purposes.

You may submit a request to opt out of the sale(s) of your OK Capsule personally identifiable information through the "Do Not Sell My Info" form.

4. Accessing and Modifying Personal Information and Communication Preferences

If you have registered for the Services, you may access, review, and make changes to your OK Capsule Information and Billing Information by following the instructions found on the Platform. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any OK Capsule marketing email.

5. Data Security

We take commercially reasonable and appropriate measures to help protect information we collect and maintain from loss and unauthorized access. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the Internet.

6. Retention of Data

In broad terms, we retain your OK Capsule data for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of the data and the reason that we have or collect the data, but in no event for less than 24 months.

We have procedures in place regarding our retention periods which we keep under review taking into account our reasons for processing your OK Capsule data and the legal basis for doing so.

7. Your GDPR Rights

This section applies to those who live in the European Economic Area, Switzerland, and the United Kingdom that use the Services and Platform.

OK Capsule, located in Vermont, United States, is the controller of any data it may collect, process and hold about you. We process personal information with your consent (e.g. when we process personal information to provide vitamin supplement or nutrition recommendations), to fulfill a contract, provide you with customer service, or as required by law.

The Platform and the Services are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred within the United States. By using the Services and/or providing us with any information, you consent to this transfer. The Platform, Services, and their servers are operated in the United States. Please be aware that your information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the Platform and/or the Services, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States and elsewhere.

You have the right to the following:

• To request access to your personal information

- To data portability
- To rectify your personal information
- To object to the processing of your personal information
- To request the erasure of your personal information
- To restrict the processing of your personal information
- To withdraw consent to the processing of your personal information

You can exercise your rights by sending an email to privacy@okcapsule.com. You also have the right to lodge a complaint with your national Data Protection Authority.

8. Children

Our Services and Platform are not directed to, or intended for, individuals under the age of 18 and we do not knowingly collect personal information from individuals under the age of 18. If you are under 18, please do not give us any information. If you believe that we have any such information, please notify us immediately and we will delete the information as quickly as possible.

9. External Websites

The Platform may contain links to third-party websites. OK Capsule has no control over the privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

10. Notice to California Residents - Your California Privacy Rights

For our California consumers, please see our <u>California Privacy Notice</u> for your specific privacy rights.

11. Changes to This Privacy Policy

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and will post any changes on the Platform as soon as they go into effect. By accessing the Platform or using the Services after we make any such changes to this Privacy Policy, you are deemed to have acknowledged such changes. Please refer back to this Privacy Policy on a regular basis.

12. Contact Us

If you have questions or concerns about this Privacy Policy, you can send an e-mail to <u>privacy@okcapsule.com</u>.