



Guidance on Handling Payment Card Information For Independent **OPTAVIA** Coaches

PURPOSE

Payment card information (which we sometimes call “Card Information”), including credit or debit card numbers, expiration dates, security codes, cardholder names, and other information collected when a person uses their credit or debit card, is sensitive information, and **OPTAVIA** is committed to protecting the information of all members of the **OPTAVIA** Community, including our Coaches and Clients.

We want to make sure you have the guidance you need to continue to appropriately protect sensitive information, so we have put together some guidance on how you as our independent **OPTAVIA** Coaches can help take the lead in safeguarding the Card Information of your Clients.

YOUR RESPONSIBILITIES AS COACHES

You can help us by:

- Limiting your access to and storage of Card Information;
- Following the guidance on Card Information below; and
- Letting us know immediately if you know or suspect that someone has seen Card Information when they shouldn't have. You can contact us here:
 - For U.S. Coaches: compliance@OPTAVIA.com
 - For Hong Kong Coaches: hkcompliance@OPTAVIA.com
 - For Singapore Coaches: sgcompliance@OPTAVIA.com

HOW TO HANDLE CARD INFORMATION

Assisting Clients with Account Creation and Order Placement

A Client may, at times, seek your help in creating an account or placing an order. During this process, the Client may trust you with their Card Information.

- Don't feel like you have to process orders on behalf of your Clients – if they decide they want to place orders themselves that is perfectly okay!
- If a Client gives you their payment card information to complete an order, you should only use it to place the exact order they requested – no more and no less!
 - Do not opt the Client in to our autoship program (**OPTAVIA Premier**) without asking them if that is what they want and letting them know the recurring charge amount.
 - The Client may be presented with exclusive offers - products at a discounted price that are related to the items that they are purchasing - but do not assume that the Client would like to take advantage of these offers. These products should only be added to the Client's order if they understand what they are ordering and the additional cost.



- Confirm with the Client what they would like to order before assisting them with any phone orders. As a reminder, telephone orders are placed by calling:
 - For U.S. Coaches and Clients: 1.888.678.2842
 - For Hong Kong and Singapore Coaches and Clients: (852) 800 931 717
- Never use a Client's payment card for any purpose besides helping Clients who request your assistance to create an account or place an **OPTAVIA** order.

KEEPING CARD INFORMATION CONFIDENTIAL

- Never share a Client's Card Information with anyone other than the Client or an **OPTAVIA** Client or Coach Support representative while assisting a Client in placing an order. If a Client's friend or family member asks you to place an order using the Client's Card Information, always check with the Client first.
- To the extent you are temporarily recording or storing it, always keep Card Information confidential—you can make sure other people can't access your Clients' Card Information by doing things like not leaving it laying around face-up on a notepad or reading out card numbers over the phone in public.
- If you've written down Card Information, don't bring it anywhere where you might accidentally lose it (like forgetting it on the bus or in a coffee shop).
- Keep your Clients' account user names and passwords confidential. Just like you would do with your own passwords, make sure you don't share their login information with anyone else.
- Always log out of a Client's account when you're finished using it for the purpose requested by the Client (including when you are away from your computer or phone).

KEEPING CARD INFORMATION SAFE

- If a Client gives you their Card Information to complete an order, place the order as soon as possible. It is best not to write down or store their Card Information on your phone or computer, even temporarily.
- If you need to contact a Client about their Card Information, make sure you speak to them directly either in person or over the phone. Don't text, email, or leave a voicemail.
- Coaches have a responsibility to their Clients to keep their information safe, which means they should never email, fax, mail, or text the information to a third party or discuss it over the phone with anyone besides an **OPTAVIA** Client or Coach Support representative.
- Be mindful of who's around you—if there are other people in the room, you should wait before repeating Card Information out loud over the phone. If you're placing an order online, make sure nobody else can see your screen.
- Never use speakerphone or another loud or widely audible form of communication when you're placing an order.
- Your Client's Card Information belongs to them. That's why it's important to communicate only with them, and not their friends or family, if you're discussing it.



WHEN YOU NO LONGER NEED A CLIENT'S CARD INFORMATION

- If you do happen to have a Client's Card Information in written form, please dispose of it as soon as you can.
- Make sure you dispose of any Card Information in your possession appropriately – throwing it in the trash or recycling bin it is not enough. You need to shred or destroy the information so that it's totally unreadable. If you're not sure how to dispose of Card Information, you can contact us here:
 - For U.S. Coaches: compliance@OPTAVIA.com
 - For Hong Kong Coaches: hkcompliance@OPTAVIA.com
 - For Singapore Coaches: sgcompliance@OPTAVIA.com
- Coaches should also never collect or keep Card Information in electronic form (like on a laptop, phone, or tablet.) However, if you somehow do have any Card Information in electronic form, you should make sure to delete it as soon as possible. Make sure it's completely deleted (for example, by emptying your "trash" on your computer). In addition, do not invite Clients to provide Card Information in electronic form (such as email or text message). If you're not sure how to dispose of Card Information that's stored electronically, you can contact us here:
 - For U.S. Coaches: compliance@OPTAVIA.com
 - For Hong Kong Coaches: hkcompliance@OPTAVIA.com
 - For Singapore Coaches: sgcompliance@OPTAVIA.com
- If you do have to destroy or delete your Clients' Card Information, consider keeping a record of the fact that you did that. For example, write down the date, time, how you disposed of the information, and what the information was. Remember not to write the Card Information in the log! Here's an example:
 - December 20, 2019, 4pm: Shredded Jane Smith's credit card number.
 - December 21, 2019, 11:15am: Deleted John Smith's debit card number off of the notes app on my phone.

BUILDING TRUST

Ultimately, you hold the responsibility for keeping any Clients' Card Information safe that you receive or hold temporarily at their request. If Card Information gets into the wrong hands, someone else might make fraudulent charges on their card or steal their identity. Trust is a huge part of how we build confidence in **OPTAVIA** and our Coaches, and you are on the front lines.

We might check in from time to time to make sure you're following this guidance or investigate if we get a complaint about your collection of Card Information. Keep in mind that it could harm the Company and your independent **OPTAVIA** Coach business if you fail to follow these Guidelines. If something happens because you did not follow these guidelines, and your Client's Card Information is compromised, you may be responsible for some of the consequences, fall out of good standing with the Company, or face disciplinary action with respect to your Coaching business.

LET'S BE IN TOUCH!

Our goal is to help our Coaches help their Clients. If there's anything in this guidance that you want more information about or if you have any questions about how to handle your Clients' Card Information, reach out! You can contact us here:

- For U.S. Coaches: compliance@OPTAVIA.com
- For Hong Kong Coaches: hkcompliance@OPTAVIA.com
- For Singapore Coaches: sgcompliance@OPTAVIA.com