

PRIVACY POLICY

This privacy policy applies to www.wine.com owned and operated by Wine.com, LLC (collectively, “We”, “Us”, “Our” or “Wine.com”). This Privacy Policy describes how Wine.com collects, uses, shares and secures the personal information you provide. It also describes your choices regarding use, access and correction of your personal information.

Wine.com has agreed to notify users of:

1. What personally identifiable information Wine.com collects.
2. What personally identifiable information third parties collect through the Web site.
3. What organization collects the information.
4. How Wine.com uses the information.
5. With whom Wine.com may share user information.
6. What choices are available to users regarding collection, use and distribution of the information.
7. What measures Wine.com takes to protect the information under its control.
8. How users can correct any inaccuracies in the information.

If you feel that our company is not abiding by its posted privacy policy, please contact the Wine.com Compliance Officer by email at privacy@wine.com or by mail at Wine.com, LLC, 222 Sutter Street, Suite 450, San Francisco, CA 94108. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

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INFORMATION COLLECTION AND USE

Wine.com is the sole owner of the information collected on this site. We will not sell, share, or rent this information to others in any way that varies from what is disclosed in this statement. Wine.com collects information from our users at several different areas on our site.

You may receive information regarding new features, services and special offers we think you'll find valuable. We may also share information with carefully selected business partners. These businesses may use the information we share to provide valuable opportunities and offers. If you'd like

to opt out of future mailings from Wine.com, LLC, follow the procedure outlined in the Choice/Opt-out section below. When we present you with the opportunity to receive marketing opportunities from our business partners we will not automatically subscribe you for these promotions, rather we will provide you with the opportunity to opt-in to these third party marketing programs.

Upon request, Wine.com will provide you with information about whether we hold any of your personal information. You may also access the personally identifiable information you have submitted to Wine.com by selecting "Your Account" and editing the information as it exists in our system currently. You are also able to access your information in order to update or delete it by sending us an email at privacy@wine.com. We will respond to your request within a reasonable time frame. For users of the Community section of Wine.com, please see "Writing Reviews/Community" section below. We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

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REGISTRATION

No registration is required in order to use this website, though a user must create an account prior to completing any purchase. Users are required to provide their name, date of birth, email address, zip code, and a password of 6-16 characters in length. This information is necessary in order for us to contact users about services on our site for which they have expressed interest. It is optional for the user to provide a phone number, but we encourage you to do so in order to have an alternate means of contact regarding an order.

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TELL A FRIEND

If you choose to use our referral service to tell a friend about our site, we will ask you for your friend's name and email address. We will automatically send your friend a one-time email inviting him or her to visit the site. Wine.com does not store this information. Your friend may contact us at privacy@wine.com to request that we remove this information from our database.

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WRITING REVIEWS/COMMUNITY

If you choose to Write a Review or post a profile on this Web site, you should be aware that any personally identifiable information you submit there can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We are not responsible for the personally identifiable information you choose to submit in these forums. To request removal of your personally identifiable information from our blog or community forum, contact us at privacy@wine.com. In some cases, we may not be able to remove your personally identifiable information, in which case we will let you know if we are unable to do so and why. Alternatively, if you used a third party application to post such information, you can remove it, by either logging into the said application and removing the information or by contacting the appropriate third party application. Members may create a Community profile which allows you to create, publish and share your wine reviews in a social setting. Here, members can post their photo and bios along with their reviews. Members may access their Community account to update or delete their personally identifiable and change their privacy settings. To do this simply log into the Community section and editing your profile.

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SHARING YOUR CONTENT AND INFORMATION FROM THE WINE.COM MOBILE APP

You own all of the content and information you post on the Wine.com Mobile App. For content that is covered by intellectual property rights, like photos (IP content), you specifically give Wine.com a non-exclusive, transferable, sub-licensable, royalty-free, worldwide license to use any IP content that you post on or in connection with the Wine.com App (IP License).

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ORDERING

Wine.com order forms request data from users including: Contact information such as name and shipping address; financial information such as credit card number, expiration date, billing address, and billing phone number. This information is used for billing purposes to verify that the customer is of legal age, and to fill customers' orders. If we encounter difficulty when processing an order, this contact information is used to contact the user. This information is harvested from a secure area and encrypted for our customers' protection. It is not sold or shared with anyone else under any circumstances.

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GIFT RECIPIENTS

We collect contact information, such as name, shipping address and phone number, for gift recipients to ensure correct gift delivery. We do not sell, share or rent any contact information for gift recipients with third parties. We do not sell or rent any personally identifiable information that you provide to us regarding gift recipients, but they may receive offers from us highlighting new features, new products and services and special offers we think they will find of interest. Also we may send marketing offers to gift recipients on behalf of ourselves and our business partners. In connection with such offers, we allow gift recipients to opt out of receiving future marketing-related mailings from us. Gift recipients may contact us at privacy@wine.com to request that we remove their email from our database.

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TRACKING TECHNOLOGIES

We Wine.com and our partners use cookies or similar technologies to analyze trends, administer the site, track users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use cookies for our shopping cart, to remember users' settings (e.g. language preference) and for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

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BEHAVIORAL ADVERTISING

We partner with a third party to either display advertising on our Web site or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

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LOG FILES

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP)

addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

We do not link this automatically collected data to other information we collect about you. Or We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality.

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SHARING

We will not sell, share, or rent this information to others in any way that varies from what is disclosed in this statement.

Wine.com will share aggregated demographic information with its partners and advertisers. This is not linked to any personally identifiable that can identify any individual person.

We may also share your physical address with carefully selected business partners. These businesses may use the information we share to mail you valuable opportunities and offers. You can opt out of future postal mailings from our business partners by sending an email to privacy@wine.com.

We may share your information with third parties who provide services on our behalf to help with our business activities. These companies are authorized to use your personal information only as necessary to provide these services to us. We use an outside shipping company to ship orders, and a credit card processing company to bill users for goods and services. These companies do not retain, share, store or use personally identifiable information for any secondary purposes.

We value your privacy at Wine.com, and will never release any account information to anyone outside of the necessary core groups that help our business function unless our customers give us the authority to do so.

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LEGAL DISCLAIMER

We reserve the right to disclose your personally identifiable information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial or bankruptcy proceeding, court order, or legal process served on our Web site. When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond

to a government request and to any other third party with your prior consent to do so.

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LINKS

This web site contains links to other sites. Please be aware that Wine.com is not responsible for the privacy practices of other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each site that collects personally identifiable information. This privacy statement applies solely to information collected by this Web site.

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SOCIAL MEDIA WIDGETS

Our Web site includes Social Media Features, such as the Facebook Like button [and Widgets, such as the Share this button or interactive mini-programs that run on our site]. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

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SINGLE SIGN ON

You can log in to our site using sign-in services such as Facebook Connect or an Open ID provider. These services will authenticate your identity and provide you the option to share certain personally identifiable information with us such as your name and email address to pre-populate our sign up form. Services like Facebook Connect give you the option to post information about your activities on this Web site to your profile page to share with others within your network.

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PUBLIC PROFILE

The profile you create on our site will be publicly accessible unless otherwise indicated. You may change the privacy settings of your profile through your account portal.

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EMAILS

If a user wishes to subscribe to our emails we ask for contact information such as name and email address. We may use your personally identifiable for purposes other than sending you promotional materials. For example, we may use your information to complete transactions requested by you, or to send you administrative communications about any account you may have with us or about future changes to this Privacy Policy. You may also unsubscribe from promotional Emails by emailing us at privacy@wine.com.

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SURVEYS & CONTESTS

Our site requests information from users via surveys and contests. Participation in surveys and contests is voluntary and the user can choose to disclose information or not. Information requested may include contact information (such as name and shipping address), and demographic information (such as zip code and age level). Contact information will be used to notify the winners and award prizes. This information may be used for marketing opportunities by Wine.com if authorized by the registrant, and will also be used for purposes of monitoring or improving the use and satisfaction of this site.

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SECURITY

When our order form asks users to enter sensitive information (such as credit card number and/or social security number), that information is encrypted with the best encryption software in the industry - SSL (Secure Socket Layers) provided by VeriSign, the premier encryption Software Company available today. On a secure page such as our order form, the lock icon on the bottom of Web browsers' switches to locked, as opposed to unlocked mode, and back to open mode when you are just browsing.

We also do everything in our power to protect user data offline. All sensitive information is restricted in our offices. Only employees who need the information to perform a specific job (for example, a Customer Care representative) are granted access to personally identifiable information, and are required to lock their station when they leave their station.

All employees are kept up to date on our security and privacy practices. Every quarter and whenever new policies are implemented, our employees are reminded about the importance of keeping customer data secure and safe at all times. The servers with personally identifiable information are stored in a locked and secure environment.

If you have any questions about the security at our website, you can send an email to: privacy@wine.com.

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SALE OF OUR COMPANY

As a natural consequence of the development of our company, we could be sold to another company. In the event that another company acquires us or a significant portion of our assets is sold to another company, all customer data including financial records and consumer information collected on Wine.com may be transferred to the new company. You will be notified via of any such change in ownership or control of your personally identifiable information.

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CHANGES IN THIS PRIVACY STATEMENT

If we decide to change our privacy policy, we will post those changes to this privacy statement, the home page, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email, or by means of a notice on our home page.

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YOUR CALIFORNIA PRIVACY RIGHTS

Beginning on January 1, 2020, California Civil Code Section 1798.100 permits customers of Wine.com (“you”) who are California residents: 1) The right to know what personal information is being collected about them; 2) The right to know whether their personal information is sold or disclosed and to whom; 3) The right to Opt-Out of the sale of personal information; 4) The right to access their personal information; 5) The right to equal service and price, even if they exercise their privacy rights.

DISCLOSURE REQUESTS OR DELETION REQUESTS

You have the right to request the disclosure and/or deletion of your collected personal information. Such requests will be fulfilled upon the receipt of a verified request. A verified request will ask the customer to log in to their account, and provide information required to verify the identity of the customer, including, but not limited to any two of the following: Name, Address, Identifying Previous Purchase, Email Address, or Payment Method

CVV. Re-authentication is needed before disclosing or deleting personal information by having a confirmation email sent to you. This confirmation email requires you to click the link before a request will be approved.

As California residents, you have the right to request the disclosure of the following:

1. The categories of personal information collected;
2. The sources of the personal information;
3. The business or commercial purpose of collecting;
4. The categories of third parties with whom Wine.com shares personal information;
5. The specific personal information that was collected about you;
6. What categories of personal information that was sold (if any) and the category of third party that it was sold to;
7. What category of personal information was disclosed for a business purpose.

The only personal information that Wine.com possesses is information provided to Wine.com by its customers. Information is gathered when an account is created for the purpose of completing a transaction. This information includes: Name, Address, Email, Phone Number, Credit/Debit card information, Order History, Username, and Password. Wine.com also uses cookies, geolocation, and may use targeted advertising and track IP addresses. Per the CCPA, at no point can we disclose your financial information or account password, even upon a verified disclosure request. If you do not have an account with Wine.com, then we do not have any of your personal information. We do not possess the personal information of minors.

Your request for right to disclosure or deletion will be automatically confirmed via email within ten days. This email will include when you should expect a response, information on the verification process, and why we possess that personal information. If you cannot be verified, we can either treat your request as a request to Opt-out, or we can contact you for more information to verify your identity. You should expect a confirmation email that your information has been deleted or disclosure of information within 45 days. Deletion includes permanent deletion, de-identification, or aggregation of the information. Any information stored on a back-up system or archive can be deleted whenever the system is next used.

Once the verifiable request is received, the consumer's personal information will be deleted from the business records and we will direct our service providers to do the same from their records if applicable. Limitations and exceptions apply:

We may rightfully retain your personal information if it is collected:

1. To complete transactions for goods or services, perform contracts, or for anticipated ongoing relationships;
2. For the detection of protection from illegal activity or to assist prosecution;
3. To identify or repair errors;
4. For free speech or other rights provided by law;
5. For compliance with California Electronics Communications Privacy Act;
6. For the engagement in statistical research in the public interest with consumer informed consent;
7. For internal uses based on consumer's relationship with the business;
8. For legal obligation compliance;
9. For otherwise internal uses in a legal matter in context with the reason that consumer provided the information.

MAKING A DISCLOSURE REQUEST OR DELETION REQUEST

Such requests will be met upon the receipt of a verifiable request. To make such a request, please call our customer service (1-800-592-5870), send an e-mail to privacy@wine.com with "Request for Disclosure" or "Request for Deletion" in the subject line, filling out this [online form](#), or write us at:

Privacy Officer

Wine.com, Inc.

222 Sutter Street Suite 450

San Francisco, CA 94108

Each consumer may make two such requests free of charge per 12-month period starting at first request date, fees may apply if requests exceeds the allowed number.

OPT-OUT REQUESTS

You also have the right to Opt-Out of the selling, sharing, or renting of your personal information. Selling personal information is defined as sharing information for any valuable consideration. Opt-out requests will be completed upon the receipt of your Opt-Out request. There is no verification needed for requests to Opt-out of the sale of personal information. These requests can be made on your behalf by an authorized agent, however, verification of your identity will be needed in these cases. This verification process may include a handwritten statement authorizing your agent to act on your behalf. Requests to Opt-Out will be complied with within 15 days. Third Parties will be notified of your opt-out request within 90 days, and you will be notified when this has

been completed. Any sale of Personal Information to a third party will be disclosed for a one-year period.

To submit an Opt-Out request, you may do so through the hyper link at the bottom of our Homepage entitled “Do Not Sell My Personal Information” or by clicking [here](#). Please note that no account is required in order to Opt-Out or to make a disclosure/deletion request. However, unless you have an account with Wine.com, we do not have any of your personal information. You can also send an e-mail to privacy@wine.com with “Opt-Out Request” in the subject line, call us at 1-800-592-5870, or write us at:

Privacy Officer

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222 Sutter Street Suite 450

San Francisco, CA 94108

RIGHT TO NON-DISCRIMINATION

There will be no price increases, or any other action taken against a customer for exercising one of their above rights as allowed by the CCPA.

Records indicating compliance with the CCPA, and any action taken to requests are kept for two years.

The Privacy Notice posted on this site was updated on February 20, 2020.