

## Knobel Spirits Privacy Policy

Last Updated: January 11, 2022

Knobel Spirits (“we” or “us”) seeks to protect the privacy rights of all individuals who visit the Knobel Spirits’ website located at <https://www.knobelspirits.com/> and any other web pages that reference this Policy (collectively, the “Site”). We have prepared this Policy to help you understand what information we gather about you through the Site, how we use that information after we’ve gathered it, and when and how we disclose that information. By visiting the Site, you are deemed to agree to the terms of this Policy, so please read the Policy carefully before using the Site.

We may update this Policy at any time. Any changes to the Policy will become effective upon the date of our posting of the revised Policy on the Site. If you visit the Site following the effective date of the revised Policy, you will be deemed to have accepted the Policy’s updated terms.

### **1. What Information Does Knobel Spirits Collect from You as a User?**

The information we collect about you when you visit the Site includes any information you actively provide, such as when you sign up to receive emails from us or register for an event. We also collect information from your computer or device used to connect to the Site, which you provide passively simply by visiting the Site.

#### ***a. Information You Actively Provide***

The information you may actively provide through the Site includes certain personally identifiable information (“**PII**”), including your name, age, and email address. If you wish to make a purchase through the Site, you will need to provide purchase-related information, such as credit card and shipping address information, but that information will be collected by the third-party vendor that currently hosts our online e-commerce platform, Speakeasy Company (<https://www.speakeasyco.com/>). Speakeasy may share with us a record of your order, but that will not include any credit card or other similar payment-related information. Speakeasy handles your PII as described in its own privacy policy, [Privacy policy \(speakeasyco.com\)](https://www.speakeasyco.com/privacy-policy).

#### ***b. Information Collected From Your Computer or Device***

Like many companies and their websites, our Site uses web browser cookies as a form of tracking user behavior on the Site. A cookie is a data file placed on a computer when it is used to visit the Site. Cookies generally contain information that is associated with your web browser, information such as website preferences, login information, or a user ID. This information enables online services to recognize you as you interact with or revisit the service.

“First party cookies” are cookies that are set by the domain that you are visiting. When you visit the Site, we serve cookies set in the domains of the Site.

“Third party cookies” are cookies served by our third party providers when you interact with the Site and our services.

“Session cookies” are stored for the duration of your visit.

“Persistent cookies” continue to be stored after you leave the Site, and may be kept for weeks, or even years.

Most web browsers automatically accept cookies but, if you prefer, you can usually modify your browser setting to disable or reject cookies. If you delete your cookies or if you set your browser to decline cookies, some features of our Site may not work or may not work as designed.

To learn more about cookies, please visit <http://www.allaboutcookies.org>.

*By visiting the Site, you are deemed to unambiguously agree to its use of any cookies that you do not disable.*

We also use tools such as Google Analytics (which in turn uses cookies) to learn more about Site visitor preferences and activities when using the Sites. Google Analytics uses cookies to collect information about Site visitors in order to provide analytics services based on a user’s visits to sites across the Internet and across other mobile applications. For further information about the collection and use of data through Google Analytics, see <http://www.google.com/policies/privacy/partners/>. Google offers the ability to opt out from tracking through Google Analytics cookies; to learn about this, visit: <http://tools.google.com/dlpage/gaoptout>

In addition, we use the Facebook pixel, which is a tiny tracking tool directly integrated into our Site by Facebook that can store a cookie on your device. If you log in to Facebook or visit Facebook when you are logged in to our Site, that will be noted in your Facebook profile. We cannot identify you personally from the data collected through the Facebook pixel, but the data is stored and processed by Facebook so that it can be linked to your Facebook user profile and used by Facebook for its own market research and advertising purposes. We use the Facebook pixel to display our Facebook ads only to Facebook users who have shown an interest in our Site or who have indicated interests in certain topics or products by visiting other websites. Using the Facebook pixel, we also can also track the effectiveness of Facebook ads for statistical and market research purposes by seeing whether users have been redirected to our Site after clicking on a Facebook ad (so-called "conversion tracking").

Facebook's processing of the data is governed by Facebook's Data Usage Policy. <https://www.facebook.com/policy.php>. For specific information and details about the

Facebook pixel and how it works, please visit the Facebook Help Center: [About Facebook Pixel | Facebook Business Help Center](#).

You may object to the collection and use of your data through the Facebook pixel to display Facebook ads. To set what kind of ads you see on Facebook, you can go to the page set up by Facebook and follow the instructions on how to set up use-based advertising: <https://www.facebook.com/settings?tab=ads>. The settings are platform-independent, *i.e.*, they are applied to all devices, such as desktop computers or mobile devices.

You may also reject the use of cookies for advertising via the Network Advertising Initiative's deactivation page (<http://optout.networkadvertising.org/>) and at the Digital Advertising Alliance's website (<http://www.aboutads.info/choices>).

Currently, our Site does not respond to a browser "Do Not Track" signal.

## **2. How Does Knobel Spirits Use the Information It Collects from You?**

- a. PII.** We may use the PII that we collect about you for any or all of the following purposes:
  - i. To provide you with our services.** We use the PII you provide to provide you with our products and services, such as facilitating your ordering our products through Speakeasy, or to register you for an event.
  - ii. To respond to your inquiries.** If you pose questions to us or request information from us, whether by email or otherwise, we will use your PII to respond to you.
  - iii. To offer you additional information.** Once you have engaged with us, we want to provide you with information regarding our resources that may be of interest to you, and we may use your PII to do that, such as, for example, by using your email address to email to you notices of additional products or services. Our commercial email messages to you will provide you with the opportunity to opt out of receiving additional commercial emails.
  - iv. To detect fraud and for legal compliance purposes.** We use your PII as needed to detect and prevent fraud against you or others, and for our legal compliance purposes more generally.
  - v. For our general business purposes.** We use PII about you for our legitimate business purposes, such as to help us expand, refine and improve the Site and to tailor our business more to your

interests and needs, including by requesting feedback from you, and for related internal purposes such as data analysis, data security, and internal audits.

**b. Information Collected Through Cookies.** We and third parties may use cookies and tracking technologies when you interact with our Site for a variety of reasons, as described below.

- i. Generally.** We use cookies to record your age and preferences; track the use of our Site and your exposure to our online advertisements; monitor traffic; improve the Site; make the Site easier to use, including remembering your preferences and settings; and make the Site more relevant to you.
- ii. Analytics.** We use tracking technologies to count visitors to the Site; monitor how users navigate the Site; count how many e-mails that were sent were actually opened or count how many articles or links were actually viewed; and for other analytic purposes.
- iii. Advertising.** We, or third parties working on our behalf, may use cookies and other tracking technologies to collect information about your interactions with the Site; provide interest-based advertisements on the Site and our services; and measure the effectiveness of advertisements.

### **3. With Whom Might Knobel Spirits Share Information About You?**

- a. PII.** Knobel Spirits shares the PII that we collect with a limited group of recipients for specific legitimate purposes, such as:
  - i. Service Providers.** We share PII with third parties who provide us with services, such as Speakeasy and vendors who assist us with accounting, auditing, data analysis, or similar services.
  - ii. Affiliates.** We may share PII with our affiliates and parent companies, under the condition that they will not share the PII with any non-affiliates.
  - iii. Acquirers or Assignees.** In the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Knobel Spirits or its assets, we may transfer any and all information that we collect from Site users to the proposed or actual acquiring party or assignee.
  - iv. Entities Entitled Under Law.** We may disclose PII as we believe to be appropriate in the following circumstances: (i) when required

by applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities; (iv) to enforce the terms and conditions for use of the Site, including this Policy; (v) to protect and defend our rights and property; (vi) to protect the interests of Knobel Spirits or others; and (vii) to permit us to pursue available remedies or limit the damages that we may sustain. We have no obligation to notify you of such disclosures, except as required by applicable law.

We do not share PII with unaffiliated third parties for their own marketing purposes.

- b. **Other Information.** We may share non-PII that we collect from or about you for any legitimate purpose.

#### 4. **How Do We Protect the PII We Collect?**

We use reasonable organizational, technical and administrative measures to help protect against the loss, misuse and alteration of the information under our control, including two-factor authentication and flow blockchains. However, no data transmission over the Internet or data storage system can be guaranteed to be 100 percent secure. Please do not send us information you consider confidential via e-mail.

#### 5. **Other Websites.**

The Site may contain links to websites operated by parties not affiliated with Knobel Spirits, including Speakeasy. These linked websites are not under our control and we are not responsible for the privacy practices or the contents of any such unaffiliated parties or their websites. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties.

- 6. **Site Restriction to Adults.** Our Site is for adults only. It is not intended for use by minors, and we do not knowingly collect PII from any minors.
- 7. **International Transfers of Information.** By using the Site, you are deemed to understand and unambiguously consent to the collection and processing of your PII in the United States, with the awareness that the laws of the United States may not provide as much protection for PII as the laws of certain other countries or territories.
- 8. **Contacting Us.** If you have any questions or concerns related to this Policy or Knobel Spirits' information practices, please reach out to us through the "Contact Us" page on the Site or send us an email at [privacy@knobelspirits.com](mailto:privacy@knobelspirits.com).