



PRIVACY POLICY

Last Updated: October 2018

1. Our Commitment to Privacy

This Privacy Policy is designed to advise you how we collect, use, and protect your personal information. We understand the sensitivity of giving out personal information, and we do not share this information with other organizations.

Please take a moment to familiarize yourself with our privacy practices and [contact us](#) if you have any questions.

2. Information We Collect

The following categories of information are collected:

- a) Information You Provide to Us: We collect any information you enter on our website, or information that you give us in any other way, such as your name, mailing address, phone number, email address, date of birth, and credit card information. This is considered Personally Identifiable Information. You can choose not to provide certain Personally Identifiable Information, but you may not be able to take advantage of our services and features.
- b) Automatic Information: When you visit a website, you disclose certain information, such as your Internet Protocol (IP) address and the time of your visit. This is considered Non-Personally Identifiable Information. This website, like many other sites, records this basic information about visits to our website.
- c) “Cookies” and “Web Beacons”: Cookies are pieces of information that are transferred to your computer from a web server. Most browsers are set up to accept cookies, but you can change your settings to have your browser notify you when you receive a new cookie or to refuse to accept cookies. A Web Beacon is an often-transparent graphic image, usually no larger than 1 pixel x 1 pixel, that is placed on a website or in an email that is used to monitor the behavior of the user visiting the website or sending the email. It is often used in combination with cookies.
- d) Data from Google Analytics: We use Google Analytics to analyze visitor trends and enhance our communications with you. Google Analytics is an analytic tool that transmits website traffic data to Google servers for analysis. Information sent to Google includes the URL of the page you’re visiting and your IP address. Our use of

Google Analytics may involve transmission of Personally Identifiable Information (“PII”), for example through the recording of a cookie identifier called the GA Client ID. For more information on how Google uses your data, please visit www.google.com/policies/privacy/partners/.

3. How, When and Why Your Information is Used

We do not collect any Personally Identifiable Information about you unless you voluntarily provide it to us, such as when you register for our services and register your e-mail address with us, or submit your credit card or other payment information when ordering and purchasing products or services on our site.

The information we collect is used for administering our business activities. Occasionally we may use the information to notify you about changes to our website, new services, or special offers. We may use the information to process your requests and wine orders; communicate with you about our products, services, offers, events and promotions, and offer you products and services we believe may be of interest to you.

We may also use Non-Personally Identifiable Information to analyze trends and enhance our communications strategies with you; to improve the quality of our online guest services; and to show our ads on other websites and services based on information collected about your use of our website.

We may also use this information for system administration to diagnose problems with our servers and software or to administer our site.

If you specifically consent to additional uses of your personal data, we may use your personal data in a manner consistent with that consent.

4. Who Has Access to the Information

Information about our users is important to us. We do not sell, trade, or rent Personally Identifiable Information to others. We may contract with third party marketing companies to serve advertisements on our behalf across the Internet. They may collect non-personal information about your visits to our website, and your interaction with our products and services. They may also use non-personal information about your visits to this and other websites to target advertisements for goods and services. These targeted advertisements may appear on other websites that you visit. The anonymous information is collected through the use of technology such as Cookies and Web Beacons. No Personally Identifiable Information is collected in this process.

5. How We Protect Your Information

The privacy and protection of your information is important to us. We do not make any personal information available to third parties without your permission. Except as provided herein, The Fringe Collective will not share your Personally Identifiable Information with third parties for marketing purposes. In accordance with our third party policies, however, a third party advertising management service (such as Google) may monitor your activity on our website. In addition, The Fringe Collective may contract with service providers to maintain and manage our customer information and website, to distribute wine club and event information to you, to fulfill promotions, to fulfill orders, and to communicate with our customers.

We do not authorize any of these service providers to make any other use of your information. The Fringe Collective reserves the right to disclose information about you as required by law, in response to legal process and law enforcement requests, and as necessary to protect the property, interests and rights of The Fringe Collective.

In Addition, we take appropriate organizational, technical and administrative measures to protect personal information under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure or is ever completely secure or error-free. Please note that you are responsible for maintaining the confidentiality of any user name or password you use.

6. Retention of Personal Information

We retain any personal data provided by you for as long as your inquiry is active (as determined by us) and for a reasonable time thereafter, or if applicable, for as long as you remain on our marketing list. Even if we delete some or all of your personal data, we may continue to retain and use aggregate, anonymous data previously collected and/or anonymize and aggregate your personal information.

7. Joining Our Mailing List

When you sign up to be on our mailing list, we will send you an e-mail confirming your wish to be added to the list. If, at any time, you wish to be removed from our mailing list, send an e-mail with “Unsubscribe” in the subject line. We will see that you are removed from the list and receive no further communications.

If you supply us with your postal address online you may receive periodic mailings from us with information on new vintages, products or upcoming events. If you supply us with your telephone number online you may receive telephone contact from us with information regarding orders placed online or information on new vintages, products or upcoming events.

8. How to Opt-Out

To opt out of receiving electronic marketing communications from us, you may (1) follow the “unsubscribe” instructions contained in any emails you receive, (2) send a blank email with

“unsubscribe” in the subject line, to info@fringecollectivewines.com from the email address you would like removed, or (3) send us a request at the address in the Contact Us section below. We will endeavor to comply with all requests as soon as reasonably practicable.

The Fringe Collective does not sell your personal information to third parties.

You may opt-out of or restrict the placement of cookies on your device or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on many mobile devices. **If you delete your Cookies, use a different browser, or buy a new computer, you will need to renew your opt-out choice.**

9. Access Your Information

You can request access to all of your Personally Identifiable Information by sending an email to info@fringecollectivewines.com. You can request that we correct the data if it is inaccurate or delete the data if The Fringe Collective is not required to retain it by law or for legitimate business purposes. We may decline to process requests that are frivolous/vexatious, are extremely impractical, or for which access is not otherwise required by local law.

10. Requests to Update, Correct or Delete Your Personal Information

You can request to have The Fringe Collective update, correct or delete your personal information by sending an email to info@fringecollectivewines.com. The Fringe Collective may decline a request to delete personal information if maintaining the personal information is necessary for the business to:

- (1) Complete the transaction for which the personal information was collected, provide a good or service requested by the consumer, or otherwise perform a contract between The Fringe Collective and the consumer.
- (2) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- (3) Debug to identify and repair errors that impair existing intended functionality.
- (4) Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
- (5) Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
- (6) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when The Fringe Collective’ deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.

(7) To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with The Fringe Collective.

(8) Comply with a legal obligation.

(9) Otherwise use the consumer's personal information, internally, in a lawful manner that is compatible with the context in which the consumer provided the information.

11. California Do Not Track Disclosures

Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, The Fringe Collective does not respond to Do Not Track signals.

12. Your Privacy Rights

California Civil Code sections 1798.83-1798.84 give California residents the right to request a notice describing the categories of personal information The Fringe Collective shares with third parties for their direct marketing purposes. Upon request, we will identify the categories of information shared and will include a list of the names and addresses of third parties with which it has been shared. If you are a California resident and would like a copy of this notice, please submit a written request using the contact information set forth below. Please allow 45 days for a response. If your request is received by a different method, please allow 150 days for a response. We are only required to respond to one request per customer each year.

13. Equal Service

The Fringe Collective provides equal service and pricing to customers regardless of whether you have exercised any privacy rights under this Privacy Policy or the California Consumer Privacy Act of 2018.

14. Consent

You acknowledge that this Privacy Policy is part of our Site Terms of Use, and by submitting information to us and/or using our website and/or mobile site, you agree to be bound by all of the terms and conditions of this Privacy Policy. **IF YOU DO NOT AGREE TO THIS PRIVACY POLICY YOU MAY NOT ACCESS OR OTHERWISE USE THE SITE.**

15. Updates to this Policy

We reserve the right to change this Privacy Policy at any time. We will notify you of any material changes to this Privacy Policy by posting a notice on the homepage for a reasonable period of time after such changes are made that this Privacy Policy has been updated, and by changing the "Last Updated" date at the top of this Privacy Policy. We encourage you to check

this page periodically for any changes. Your continued use of this website following the posting of changes to this Privacy Policy will mean you accept those changes.

16. Not Directed to Individuals Under the Legal Drinking Age

Our website is not intended for people under the legal drinking age of 21. We do not seek or knowingly collect any personal information from or about individuals under the age of 21. If we become aware that we have unknowingly collected personal information from an individual under the legal drinking age, we will make commercially reasonable efforts to locate and delete such information from our database.

17. Contact Us

Any questions or complaints you may have regarding our Privacy Policy should be directed via email to info@fringecollectivewines.com or by telephone call to (707) 744-1250. You can also write us at: The Fringe Collective, 12901 Old River Rd., Hopland CA 95449. Specific information about the personal information we collect and use is available upon request.