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Privacy Policy

Effective Date: 17 September 2019

1. Our Commitment to Privacy

At Fetzer Vineyards we value your 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. By using this website you agree to the collection of and use of your information as stated in this Privacy Policy.

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

2. Personal Information We Collect

By visiting or using our website, we may collect the following categories of personal information you provide us:

- a) Information You Provide to Us:
- Birthdate:
- Name:
- Demographic information (such as your gender);
- Email address;
- Telephone number;
- Mailing address;
- Credit card number and payment information;
- Username and password;
- Details of transactions that you carry out through our Services and the fulfillment of your orders;
- Your geo-location;
- Loyalty account information; and
- Any other Personal Information you volunteer, including in the order notes, in relation to a promotion (including contests, sweepstakes, offers, and rebates) or survey, or on any of our community forums, social media offerings or blogs.
- b) Social Media and Third-Party Sources/Applications: We may from time to time request you post comments and images from your social media account(s) (including, but not limited to, Instagram, Twitter and Facebook) with certain hashtags. In certain instances, if you add those hashtags to your image, depending upon your social media privacy settings, the image may be redisplayed on our websites. While you retain ownership of the image, using the hashtags we request gives us permission to display and re-display the image. The image may contain information about you, and we may collect and use that information for marketing and research purposes. If you do not want your image posted on our websites, please do not use our requested hashtags.

In addition, we may receive certain categories of Personal Information listed above from sources other than you, such as from third-party applications (including, but not limited to,

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Instagram, Twitter and Facebook) that you use in conjunction with this website (e.g., for age-gating purposes), as well as from our other brands, affiliates, subsidiaries, business partners, and third-party data providers, which we may combine with the information you have provided for the purposes described in this Privacy Policy.

- c) Automatic Information: This website, like many other websites, records basic information about visits to our website. When you visit our website, you disclose certain personal information, such as your Internet Protocol (IP) address, the date and time of your visit, the pages you view, and the search terms you enter, etc. ("Device Information").
- IP address;
- Device identifier:
- The website you visited before using our Service;
- Browser type;
- Any search terms entered on or through our Service;
- General location data based on your Device Information, such as country, state or province;
- Computer operating system;
- Access times:
- Usage patterns and page views within our Service;
- Log files;
- Cookies;
- Clear gifs; and
- Flash LSOs.
- d) Cookies: Cookies are data files that are placed on a computer when it is used to visit a website. These cookies may be used for many purposes, including, without limitation, tracking user preferences or web pages visited while using our Service. Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Service. For example, cookies allow us to store items in your cart between visits. In addition, please be aware that if you choose to block cookies, some advertising preferences that are dependent on cookies may not be able to be respected.
- e) Web Beacons: We may include small graphic images called web beacons, also known as "Internet tags" or "clear gifs," in our web pages and e-mail messages. We may use web beacons or similar technologies for a number of purposes, including, without limitation, to count the number of visitors to our Service, to monitor how users navigate the Service, and to count how many e-mails that we sent were actually opened or how many particular articles or links were actually viewed.
- f) 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 are 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 Google Analytics 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

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 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 precise geolocation, where you have provided your consent for us to collect such information, to provide location-based services and content, as well as to understand traffic patterns in and around our retail locations.

We also use your birthdate to verify that you are of legal drinking age, as we are in the business of selling alcoholic beverage products.

In addition, we use your information for compliance with our company policies and procedures, for accounting and financial purposes, and as otherwise consented to by you and as required or permitted by law. If you do not provide us with information as described above, we may not be able to fulfill the applicable purpose of collection, such as to respond to your queries or provide our Services to you.

4. Who Has Access to the Information

From time to time, we may share your information with our other brands, affiliates, subsidiaries, business partners, third party service providers and authorities in the following circumstances:

- Our Affiliates, Subsidiaries and Business Partners. We may share your information with our affiliates, subsidiaries and business partners in the US and worldwide for the purposes described above and for other general business administration purposes. By visiting or using our Services or otherwise providing us with your information, you consent to this transfer of your information throughout our network of entities.
- Service Providers. We may share your information with third parties who perform functions on our behalf (e.g., hosting or operating our Services, processing credit card payments, sending email marketing communications, carrying out contests, special offers, or promotions, processing job applications, data analysis and other business support services). We do not authorize these third parties to use your information for purposes other than for which it was provided, and do not authorize these third parties to disclose that information to unauthorized parties. We require these third parties to maintain appropriate security to protect your information from unauthorized access or processing.
- As Required or Appropriate by Law. We may disclose your information to regulatory authorities, courts, government agencies and other third parties where we believe that doing so would be in accordance with or permitted or required by any applicable law,

regulation or legal process, to defend the interests, rights, and/or property of us or others, or to respond to emergencies.

• Business Transfers. We may transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets.

In addition to the above circumstances, we may share your information with other parties as directed by you or subject to your consent. We may also share and otherwise process aggregated information or de-identified information that does not identify you individually with other parties. For example, we may share aggregated statistics about pages viewed on our websites or Services, demographic information and sales, and other shopping information with third parties to enrich your visitor experience.

Information about our users is important to us. We do not sell, trade, or rent Personally Identifiable Information to others.

5. How We Protect Your Information

We use standard security measures. 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, Fetzer Vineyards 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, Fetzer Vineyards 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 keep personal information as long as it is necessary or relevant for the practices described in this Privacy Policy. We also keep information as otherwise required by law.

In Addition, we take appropriate organizational, technical and administrative measures to protect personal information under our control, this includes not sharing your passwords. 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

Your personal data is retained for a period appropriate to the purposes for which it was collected. 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. You may object to the further processing of such data, as well as object to receiving marketing e-mails. You may exercise the right at any time by writing to privacy@fetzer.com.

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.

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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

If, at any time, you wish to be removed from our mailing list, send an e-mail with "Unsubscribe" in the subject line to privacy@fetzer.com or write to us at Fetzer Vineyards, Attn: Fetzer Vineyards Privacy Policy, PO Box 611, 12901 Old River Road, Hopland, CA 95449.

To opt out of receiving electronic marketing communications from us, you may (1) follow the "unsubscribe" instructions contained in any emails you receive, or (2) 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.

We will make good faith efforts to make requested changes as soon as reasonably practicable (but we may retain prior information as business records). Please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons.

9. Access Your Information

If you have created an online account with us and would like to update the information you have provided to us, you can access your account to view and make changes or corrections to your information. Depending on applicable law, you may have the right, and we also provide you with the opportunity to be informed of whether we are processing your information and to access, correct, update, oppose, delete, block, limit or object, upon request and free of charge, to our use of your information to the extent required by applicable law. For such inquiries, please contact us as detailed under the "Contact US" section below. We will try to comply with your request as soon as reasonably practicable as required by applicable law. Please note that we may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by applicable law.

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

You can request to have Fetzer Vineyards update, correct or delete your personal information by sending an email to privacy@fetzer.com. Fetzer Vineyards may decline a request to delete personal information if maintaining the personal information is necessary for the business to:

- 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 Fetzer Vineyards and the consumer.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- 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.

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- 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.
- 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 Fetzer Vineyards' deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with Fetzer Vineyards.
- Comply with a legal obligation.
- 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. Do Not Track Policy

Do Not Track is a privacy preference that users can set in their web browsers. Some browsers have "do not track" features that allow you to tell a website not to track you. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. You can set your device or browser to accept or reject most cookies, or to notify you in most situations that a cookie is offered so that you can decide whether to accept it. If you block cookies, certain features on our websites may not work. If you block or reject cookies, not all of the tracking described here will stop.

Fetzer Vineyards may place or recognize technology on your browser or device when you visit or use our website for purposes of serving you targeted advertising (also referred to as "online behavioral advertising"). Fetzer Vineyards also work with third party advertising companies who place their own cookies or similar technology on your browser or device when you visit or use our Services and other websites to serve customized advertisements to you as you browse the Internet. As noted above, you can set your device or browser to accept or reject most cookies, or at least notify you in most situations that the technology is offered. As an additional step, these advertising companies may participate in one of the following self-regulatory programs for online behavioral advertising, with corresponding user opt-outs:

- Networking Advertising Initiative (http://www.networkadvertising.org/choices/) (US Only)
- Digital Advertising Alliance (http://www.aboutads.info/choices/) (US Only)
- European Interactive Digital Advertising Alliance (http://www.youronlinechoices.eu/) (EU Only)
- Digital Advertising Alliance Canada (http://youradchoices.ca/choices) (Canada Only)
- DAA App Choices Mobile App (**Mobile Devices Only**) For mobile devices (e.g., smartphone, tablets), you may consider downloading the DAA AppChoices Mobile App to manage such technology.

Please note that even if you reject such technology, you may continue to receive advertisements, but the advertisements will not be tailored to your browsing activities and interests.

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12. Your Privacy Rights

Under California's "Shine the Light" law, if you are a California resident who provides personal information in obtaining products or services for personal, family, or household use, you may request to opt-out of such sharing by a brand at no-cost by contacting us as detailed in the "Contact Us" section below. Please be aware that your opt-out will apply only to the sharing by that particular brand.

13. Consent

You acknowledge that this Privacy Policy is part of our website 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 WEBSITE.

14. Updates to this Policy

Except to the extent limited by applicable law, we reserve the right to update this Privacy Policy to reflect changes to our information practices by prominently posting notice of the update on our website. Any updates will become effective immediately after posting the updates to the Privacy Policy and apply to all information collected about you. If we make any changes to this Privacy Policy that materially impact previously collected information about you, we will, to the extent that we have your email address, notify you by email.

15. Not Directed to Individuals Under the Legal Drinking Age

Our website is intended only for those of legal drinking age. 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.

16. Contact Us

If you have any questions about this Privacy Policy or information we have collected about you, or would like to make a complaint about our handling of your personal information, please contact us by email at privacy@fetzer.com. You can also write to us at the address below.

Fetzer Vineyards Attn: Fetzer Vineyards Privacy PO Box 611 12901 Old River Rd Hopland CA 95449.