# Patco Brands Privacy Notice

# **Information for All Users**

MPL Brands NV, Inc. d/b.a Patco Brands and its affiliates ("**Patco Brands**," "we", "us") value the privacy of individuals who use our websites and related services (collectively, our "**Services**"). This Privacy Notice explains how we collect, use, and share the information of users of our Services, including business-to-business information ("**Users**" or "**you**"). By using our Services, you agree to the collection, use, disclosure, and processing of your information as described by this Privacy Notice. This Privacy Notice does not apply to how third parties define personal data or how they use it. We encourage you to read their privacy policies and know your privacy rights before interacting with them.

If you are a resident of the United States, you can view our United States-specific privacy notice at <u>https://www.patcobrands.com/US-privacy-policy</u>

If you are a resident of the United Kingdom, the European Union and/or the European Economic Area, you can view our EU-specific privacy notice at <a href="https://www.patcobrands.com/GDPR">https://www.patcobrands.com/GDPR</a>

#### Persons Under Legal Purchase Age Are Not Allowed

Patco Brands maintains the Services for the use of individuals who are twenty one (21) years of age or older, or otherwise of legal purchase age of alcoholic beverages under applicable law, and you must be of legal purchase age where you reside to access the Services or provide any information to us.

We do not solicit or knowingly collect any information from any individuals under such legal purchase age, and we do not knowingly market our products or services to persons under such legal purchase age.

Prior to the collection of any information, you will be required to affirm that you are of legal purchase age. Please do not provide us with your information if you are not of legal age to purchase alcohol in the jurisdiction in which you reside and (if different) in the jurisdiction in which you are interacting with us. If we receive notice or believe that someone under the legal purchase age has provided us with information we will use reasonable efforts to remove such information from our files, or to flag such information and (to the extent permitted by law) retain it for the sole purpose of ensuring that it is no longer used.

## **Information We Collect**

We may collect a variety of information about you or your devices from various sources, as described below.

#### Information You Provide to Us

**Registration Information.** If you sign up for an account, register to use our Services, or sign up for emails or other updates, we may ask you for basic contact information, such as name, email, phone number, or mailing address. We may also collect certain demographic information when you register for our Services, including age.

**Communications.** If you contact us directly, we may collect additional information from you. For example, when you reach out to our customer support team or otherwise contact us via email, we may collect your name, email address, mailing address, phone number, or other contact information so that we can verify your identity and communicate with you. We may also store the contents of any message or attachments that you send to us, as well as any information you submit through any of our forms or questionnaires.

**Events.** If you register for an event that we host, whether in-person or online, we may collect relevant information such as your name, address, title, company, phone number, or email address, as well as specific information relevant to the event for which you are registering.

**Payment Information.** If you make a purchase through the Services, your payment-related information, such as credit card or other financial information, may be collected by our third-party payment processor on our behalf.

**Job Applications.** If you apply for a job with us, we may collect relevant information such as your name, phone number, email address, position, job history, education history, references, a cover letter, or similar information.

#### Information We Collect Automatically When You Use Our Services

**Device Information.** We may collect information about the devices and software you use to access our Services, such as your IP address, web browser type, operating system version, device identifiers, or similar information.

**Usage Information.** To help us understand how you use our Services and to help us improve them, we may collect data about your interactions with our Services. This includes information such as crash reports, session lengths and times, the pages or other content you view, and any searches you conduct on our site.

**Cookies and Similar Technologies.** We and our third-party partners may collect information using cookies, pixel tags, or similar technologies. Cookies are small text files containing a string

of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services. We ask for user consent before placing non-essential cookies on your device.

#### Information We Receive from Other Sources

We may receive information about you from other sources, including third parties that help us update, expand, and analyze our records, identify new customers, or detect or prevent fraud. We may also receive information about you from social media platforms, for example when you interact with us on those platforms or access our social media content. What information we receive from third parties is governed by the privacy settings, policies, and/or procedures of the relevant organizations, and we encourage you to review them.

#### How We Use the Information We Collect

We may use the information we collect:

- To provide, maintain, improve, and enhance our Services
- To understand and analyze how you use our Services and develop new products, services, features, and functionality
- To facilitate purchases of products or services that you order
- To host events
- To evaluate and process applications for jobs with us
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide User support
- For marketing and advertising purposes, including developing and providing promotional and advertising materials that may be relevant, valuable or otherwise of interest to you
- To detect and prevent fraud, and respond to trust and safety issues that may arise
- For compliance purposes, including enforcing our Terms of Service or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency
- For other purposes for which we provide specific notice at the time the information is collected

## When Do We Share the Information We Collect

<u>Service Providers.</u> We engage service providers to perform functions and provide core services to us (such as marketing, public relations, hosting, data management and analysis, storage security, marketing, delivery of products and services, customer service, email delivery, and reporting services) related to the operation and provision of the Services and promotions offered. This includes third party sponsors and administrators of sweepstakes, contents and similar promotions. We may share any information we collect with service providers retained in connection with the provision of our Services. These companies are only permitted to use this information to help us provide our Services, not for their own purposes.

<u>*Our Affiliates.*</u> We may share your information with our affiliates, subsidiaries, and representatives as needed to provide our Services.

<u>*Our Partners.*</u> We use analytics services to collect and process certain analytics data. We also work with third-party advertising partners. These services may also collect information about your use of other websites, apps, and online resources. These partners include:

Partner	Description	More Information
Google	We use Google's services to collect and process analytics data and to place ads that we think may interest our users and potential users.	<u>Google Privacy and Terms</u>
Meta/Facebook	We use Facebook's services to place ads that we think may interest our users and potential users.	Meta [Facebook] Data Policy Facebook Advertising
LinkedIn	We may use LinkedIn's services to place ads that we think may interest our users and potential users, as well as to advertise openings to potential employees.	<u>LinkedIn Privacy Policy</u> LinkedIn Cookie Policy

Please note that this table may be updated from time to time to provide you with the latest information. For more information about your choices regarding how these partners use your information, see the <u>Your Choices</u> section below.

As Required by Law and Similar Disclosures. We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; (c) protect your, our, or others' rights, property, or safety; or (d) to address fraud, security or technical issues, or to protect Patco Brands' rights or property. However, nothing in this Privacy Notice is intended to limit any legal defenses or objections that you may have to a third party's, including a government's, request to disclose your information. Additionally, we may disclose information in situations that we believe to be emergencies involving potential threats to the physical safety of any person or property if we believe that your information in any way relates to that threat.

*Events.* We may share your information with event partners or co-sponsors to facilitate the events for which you register.

*Merger, Sale, or Other Asset Transfers.* We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or in which we sell, liquidate, or transfer all or a portion of our assets. The use of your information following any of these events will be governed by the same general provisions of this Privacy Notice.

*Consent.* We may also disclose your information at your direction or with your permission.

<u>Public Postings</u>. Please note that your information may be shared by you when you post on social media profile pages and other services to which you are able to post information and materials visible to others and/or the general public via the Services. Also please note that all information you post or disclose on these public areas will become public information, and you will be subject to the privacy policy of such third party website or application. Your Personal Information may be shared with your friends associated with your social media account, to other users of the Services and to your social media account provider, in connection with your social sharing activity. If you do not want your information shared with other users or with your social media account provider, please do not participate in social sharing on the Services.

## Your Choices

<u>Our Communications.</u> From time to time, you may receive marketing or other informational email messages from us. You can unsubscribe from our promotional and informational emails via the link provided in the emails. Users may continue to receive administrative messages from us necessary to service User accounts after opting out of receiving promotional messages from us.

<u>Cookies</u>. Cookies are small text files containing a string of alphanumeric characters that are placed on your device when you use our Services. We (or our third-party partners) may use cookies to collect information as described below. We may use both session cookies and

persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to our Services. We may use the following types of cookies:

- *Functional Cookies*: Functional Cookies, also referred to as "Essential" or "Strictly Necessary" Cookies, are cookies that we have to use in order for our Services to function. We cannot provide you with the Services without this type of cookie.
- <u>Analytical Cookies</u>: Analytical Cookies, also referred to as "Performance Cookies," capture statistical data that shows us how our Users navigate and interact with our Services. We then use that information to maintain and improve upon the Services.
- <u>Advertising Cookies</u>: Advertising Cookies are cookies that show you ads we think may interest you. For example, we may use Advertising Cookies to show you ads for our products and services on other websites, or to show you ads for third party products or services on our website. Advertising Cookies may collect personal data over time and across different websites.

We ask for user consent before placing any non-essential cookies on your device.

Most web browsers allow you to manage cookies through the browser settings. To find out more about cookies, you can visit <u>www.aboutcookies.org</u> or <u>www.allaboutcookies.org</u>.

<u>*Our Partners.*</u> You can learn more about Google's privacy practices and your options about how they use your information on Google's <u>website</u>. You can also install the <u>Google Analytics Opt-out</u> <u>Browser Add-on</u>. Meta, the parent company of Facebook, provides information about how it uses the information it collects through our Services in its <u>Data Policy</u>. You can also learn specifically about Facebook's advertising practices on its <u>website</u>. Some of our advertising partners are members of the <u>Network Advertising Initiative</u> or the <u>Digital Advertising Alliance</u>. You can visit those organizations' websites to learn about how you may opt out of receiving web-based personalized ads from their member companies. You can also access any settings offered by your mobile operating system to limit ad tracking. To inquire about your choices regarding our business partners generally, contact us at <u>privacy@patcobrands.com</u>.

We do not currently maintain any procedures for you to review the information that we collect about you; your only option at this time is to request alteration or deletion of all Personal Information about you in our databases.

## **Third-Party Content**

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the content provided by, or the privacy practices of, these third parties. Please be aware that this Privacy Notice does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them. We are not responsible for the content provided by, or the privacy practices of, these third parties.

If you interact with us on social media platforms, such as Instagram, Facebook or Twitter, those interactions are also governed by the terms and privacy policies of the social media platform provider.

# <u>Security</u>

We make reasonable efforts to protect your information by using administrative, technological, and physical safeguards designed to improve the security of the information we maintain and protect it from accidental loss, unauthorized access or use, or any other inappropriate or unlawful processing. However, because no information system can be 100% secure, we cannot guarantee the absolute security of your information.

# **Children's Privacy**

We do not knowingly collect, maintain, or use information from children under 13 years of age, and no part of our Services are directed toward children. If you learn that a child has provided us with information in violation of this Privacy Notice, then you may alert us at privacy@patcobrands.com.

## **International Visitors**

Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By using our Services, you consent to the transfer, storage, and processing of your information as described in this Privacy Notice.

## **Changes to this Privacy Notice**

We will post any adjustments to the Privacy Notice on this page, and the revised version will be effective when it is posted. If we make material changes, we may notify you via a notice posted on our website or another method. The most current version of our Privacy Policy will be posted to this URL. We encourage you to read this Privacy Notice periodically to stay up to date about

our privacy practices. Once posted, the changes to the Privacy Notice will be effective immediately. By continuing to access or use of the Services after changes have become effective, you agree to be bound by the terms of the revised Privacy Notice. If you do not agree with our Privacy Notice, please do not use our Services.

#### **LIMITATION OF LIABILITY**

By providing us with any Personal Information you expressly and unconditionally release and hold harmless Patco Brands, its parents, subsidiaries, affiliates, related companies and their respective shareholders, owners, members, directors, officers, managers, employees and agents (collectively, the "Releasees") from any and all liability for any injuries, loss or damage of any kind arising from or in connection with the use and/or misuse of your collected Personal Information. In addition, we cannot be held liable for any injuries, loss or damage of any kind arising from or in connection with the use and/or misuse of your Personal Information by any third parties who receive your Personal Information. We make no representations or warranty regarding any third-party's use, collection or disclosure of your Personal Information.

#### Contact Us

If you have any questions, comments, or concerns about our processing activities, please email us at privacy@patcobrands.com. Or you may write to us at:

Legal Department

MPL Brands NV, Inc.

71 Liberty Ship Way, Sausalito, CA 94965

Please Drink Responsibly