

This Privacy Policy describes the policies and procedures of The Multnomah Whiskey Library, LLC ("MWL" or "we" "our" or "us") on the collection, use and disclosure of your information in connection with your use of our website (<https://mwlpdx.com>), including the services, features, or content we offer (collectively the "Site"). We receive information about you from various sources, including: (i) through your member account (your "Account"); (ii) your use of the Site generally; and (iii) if you choose to sign up to receive our Newsletter. When you use the Site, you are consenting to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy.

### **What Does This Privacy Policy Cover?**

***In Short:*** *This Privacy Policy covers the treatment of your Personal Information gathered when you are using or accessing our Site.*

We are committed to protecting your Personal Information and your right to privacy. Throughout this Privacy Policy, "Personal Information" means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked with an individual or household. These include information such as full name, postal address, e-mail address and/or telephone number, and if applicable also usage data such as your IP address. Such is the data we collect when you visit the Site. However, Personal Information does not include publicly available information from government records, or de-identified or aggregated consumer information.

Here we seek to explain to you in the clearest way possible what Personal Information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of our Site. Otherwise, if you have any questions or concerns about this Privacy Policy, or our practices with regards to your Personal Information, please contact our Data Protection Officer ("DPO") at [dpo@MWlpdx.com](mailto:dpo@MWlpdx.com).

**Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your Personal Information with us.**

This Privacy Policy does not apply to the practices of third parties that we do not own or control, including but not limited to any third party websites, services and applications (each a "Third Party Service") that you elect to access through the Site or to individuals that we do not manage or employ. While we attempt to facilitate access only to those Third Party Services that share our respect for your privacy, we cannot take responsibility for the content or privacy policies of those Third Party Services. We encourage you to carefully review the privacy policies of any Third Party Services you access.

### **What Information Do We Collect Automatically from You?**

***In Short:*** *Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our Site.*

We automatically collect certain information when you visit, use or navigate the Site that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked with you or your household. This information may not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use

our Site and other technical information. This information is primarily needed to maintain the security and operation of our Site, and for our internal analytics and reporting purposes.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** “Cookies” are small text files that are placed on your device by a Web server when you access our Site. We may use both session Cookies and persistent Cookies to tell us how and when you interact with the Site. We may also use Cookies to monitor aggregate usage and web traffic routing on our Site and to customize and improve the Site. Unlike persistent Cookies, session Cookies are deleted when you navigate away from the Site and close your browser. Although most browsers automatically accept Cookies, you can change your browser options to stop automatically accepting Cookies or to prompt you before accepting Cookies. Please note, however, that if you don’t accept Cookies, you may not be able to access all portions or features of the Site. Some Service Providers, who are defined as companies or organizations with whom we have a contractual relationship in connection with fulfilling our services to you (“Service Providers”), that we engage (including advertisers) may also place their own Cookies on your device. Note that this Privacy Policy covers only our use of Cookies and does not include use of Cookies by any Third Party Service or Service Provider you visit directly, both which should have their own privacy policies.
- **Flash Cookies.** Certain features of our Site may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Site. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons.** Pages of our Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related Sites statistics (for example, recording the popularity of certain Sites content and verifying system and server integrity).

### What Other Information Do You Provide to Us?

*In Short:* You provide us information if you sign up for our Newsletter or register for membership on our Site.

#### Account Information:

If you register for membership on our Site, you will provide information that could be Personal Information, such as your date of birth, a user name, your email address, your time zone, a password, and if you were referred to our Site by an existing registered member. You may also choose to provide additional Personal Information by editing your profile. You may choose to include information about yourself, basic demographic information including age and location, a description of your interests, your favorite drinks, and links to your website or social media profiles.

#### The Newsletter:

Through our Newsletter, we send our information about upcoming events and related material. If you choose to be on our mailing list, all we ask for is your name and email address.

### Do We Collect Personal Information of Minors?

*In Short:* We do not knowingly collect data from or market to persons under 18 years of age.

We do not knowingly collect or solicit Personal Information from anyone under the age of 18. If you are under 18, please do not attempt to register for the services or send us any of your Personal Information. If we learn that we have collected Personal Information from a person under age 18, we will delete that information as quickly as possible. If you believe that a person under 18 may have provided us Personal Information, please contact us at [dpo@MWLpdx.com](mailto:dpo@MWLpdx.com).

## How, and with Whom, Is My Personal Information Shared or Transferred?

***In Short:*** We only share information either with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.

We may process or share data (including your Personal Information) based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your Personal Information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your Personal Information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your Personal Information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your Personal Information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

Additionally, we may need to process your data or share your Personal Information in the following situations:

- **Service Providers.** We may share your data with our Service Providers. We may allow Service Providers to use tracking technology on the Site, which will enable them to collect data about how you interact with the Site over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Privacy Policy, we do not share, sell, rent or trade any of your Personal Information with any Third Party Service or Service Provider for their promotional purposes.
- **Business Transfers.** We may share or transfer your Personal Information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

## What Information Is Collected from Other Sources or Shared?

***In Short:*** We may collect limited data from public databases, marketing partners, and other outside sources.

We may obtain Personal Information about you from other sources, such as public databases and other Third Party Services. Such Third Party Services are neither part of our Site nor a Service Provider with whom we have a contractual relationship. All Personal Information that you provide on or to such Third Party Service or that is collected by a Third Party Service is provided directly to the controller, owner or operator of the Third Party Service and is subject to the owner's or operator's privacy policy. We do not monitor or control any data you provide to Third Party Services. To that end, we are not responsible for the content, privacy or security practices of a Third Party Service. To assure the protection of your Personal Information, we recommend that you carefully review the privacy policies of any Third Party Service you access. You assume the risk of providing any information you provide to a Third Party Service.

Other than Third Party Services as noted above, we do share your Personal Information with certain Service Providers. Any Personal Information collected may be shared with our Service Providers.

Below is a list of the Service Providers as of the date of this Privacy Policy. Please check this Privacy Policy regularly for updates on other Service Providers that may be added to our Site or contact us at

[dpo@MWLpdx.com](mailto:dpo@MWLpdx.com) for the most recent list of Service Providers with whom we are legally or contractually obligated to share your information to facilitate your use of the Site.

- **Google Analytics**

We use Google Analytics, a web analysis service of Google Inc. ("Google") on our Site. Google Analytics is a web analysis tool with the help of which we analyze the interaction of the visitors with our website and thus are able to improve our Site for you further. Google Analytics also uses cookies, as they were in principle described in more detail above. The information generated by the cookie regarding your use of our Site are usually transferred to a server belonging to Google in the US and stored there. The Site operator has a legitimate interest in analyzing user behavior to optimize both its Site and its advertising. The information saved by the cookies includes, for instance, the time of the Site visit, the frequency with which the visitor has called up the Site, and from where the visitor has accessed the Site. To determine the latter value, Google initially records the IP address of the user. However, we have activated the IP anonymization on our Site. Based on this, your IP address within Member States of the European Union or in other signatory states of the Treaty on the European Economic Area is shortened by Google before transmission to the US. Only in exceptional cases is the full IP address transferred to a server belonging to Google in the US and shortened there. On our behalf, Google will use the aforementioned information to analyze your usage of the Site, to compile reports on the Site activities and to provide further services associated with the usage of the Site and the Internet towards the Site operator. The IP address communicated under Google Analytics by your browser is not merged with other data of Google. You can prevent the saving of the cookies by Google Analytics by a corresponding setting in your browser software; however, reference should again be made to the fact that in this case you may not be able to use all functions of our Site.

In addition, you can prevent the recording of the data generated by the cookie and relating to your usage of the Site (incl. your IP address) to Google and the processing of these data by Google, by downloading and installing the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de> Further information on data protection with regard to Google Analytics can be found directly on Google's website.

- **Google Web Fonts**

For uniform representation of fonts, this page uses web fonts provided by Google. When you open a page, your browser loads the required web fonts into your browser cache to display texts and fonts correctly. For this purpose your browser has to establish a direct connection to Google servers. Google thus becomes aware that our Site was accessed via your IP address. The use of Google Web fonts is done in the interest of a uniform and attractive presentation of our Site. If your browser does not support web fonts, a standard font is used by your computer.

Further information about handling user data, can be found at <https://developers.google.com/fonts/faq> and in Google's privacy policy at <https://www.google.com/policies/privacy/>.

- **Google Maps**

This Site uses the Google Maps map service via an API. It is operated by Google. To use Google Maps, it is necessary to save your IP address. This information is generally transmitted to a Google server in the US and stored there. The provider of this Site has no influence on this data transfer. The use of Google Maps is in the interest of making our Site appealing and to facilitate the location of places specified by us on the Site.

Further information about handling user data, can be found in the data protection declaration of Google at <https://www.google.de/intl/de/policies/privacy/>.

## **What Public Information About You and Your Activity on the Site Can Others View?**

**In Short:** Information you post about you on our Site may be viewed by others who access the Site.

Information you choose to include in your profile, or any Personal Information you share about yourself on our Site may be viewed by others who access the Site. This includes information you choose to provide openly, including your username, contact name, information about yourself, and links to your website or social media profiles, which may be displayed to other users to facilitate user interaction within the Site. We will not directly reveal user email addresses to other users.

Some of your activity on and through the Site is public by default. This may include, but is not limited to, content you have posted publicly on the Site or otherwise through the Site. Please remember that if you choose to provide Personal Information using certain public features of the Site, then that information is governed by the privacy settings of those particular features and may be publicly available. Individuals reading such information may use or disclose it to other individuals or entities without our control and without your knowledge, and search engines may index that information. We therefore urge you to think carefully about including any specific information you may deem private in content that you create or information that you submit through the Site.

### **What Personal Information Is Disclosed for Our Protection and the Protection of Others?**

***In Short:** We may have to share your Personal Information if legally required to do so.*

We reserve the right to access, read, preserve, and disclose any information (including your Personal Information) as we reasonably believe is necessary to (i) satisfy any applicable law, regulation, legal process or governmental request, (ii) enforce this Privacy Policy, (iii) detect, prevent, or otherwise address fraud, security or technical issues, (iv) respond to user support requests, or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

### **What Choices Do You Have Regarding Your Personal Information?**

***In Short:** If you are a California, Connecticut, Utah or Virginia resident, you have several options to control and manage the amount of Personal Information you share with us.*

- **Privacy Rights:**

If you are a resident of California, Colorado, Connecticut, Utah or Virginia and you have provided us with your Personal Information, you have the right to request that we:

- A) Disclose the categories and specific pieces of Personal Information we have collected;**
- B) Disclose the categories of sources from which the Personal Information is collected;**
- C) Disclose the purpose for collecting or selling your Personal Information;**
- D) Disclose the categories of third parties with whom we share your Personal Information;**
- E) Delete/rectify/restrict Personal Information about you that we have collected from you, subject to certain exceptions (right of rectification not applicable to Utah residents); and**
- F) Not sell your Personal Information or subject certain Personal Information to automated decision-making algorithms (the latter not applicable in Utah).**

Such requests must be submitted to us in writing at [dpo@MWLpdx.com](mailto:dpo@MWLpdx.com).

### **What Choices Do California Residents Have Regarding Their Personal Information?**

***In Short:** If you are a California resident, you have several options to control and manage the amount of Personal Information you share with us.*

In the following paragraphs, we seek to comply with the California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act of 2020 (CPRA). Any terms defined in the CCPA and CPRA have the same meaning when used in this Privacy Policy.

## Personal Information We Collect

We collect the following categories of Personal Information (or “PI”) from consumers:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. PI categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. <i>Some PI included in this category may overlap with other categories.</i>	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES

F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with websites, services, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other PI.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

### Use of Your Personal Information

We do not sell your PI. In addition to the specific uses noted in the Privacy Policy, we may generally use, or disclose the PI we collect for business purposes, including:

- Auditing user interactions and concurrent transactions.
- Detecting security incidents and preventing fraud.
- Debugging.
- Performing our services.
- Advertising and marketing our services.
- Performing analytics and quality control.
- Researching and testing to improve our services.

We will not collect additional categories of PI or use the PI we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## Sharing Your Personal Information for a Business Purpose

In the preceding twelve (12) months, MWL has disclosed the following categories of PI for a business purpose:

- Category A: Identifiers.
- Category B: California Customer Records PI categories.
- Category F: Internet or other similar network activity.

## Your Rights and Choices

The CCPA and CPRA provide consumers (California residents) specific rights regarding their PI. This section describes your rights and explains how to exercise those rights.

### *Access to Specific Information and Data Portability Rights*

You have the right to request that we disclose certain information to you about our collection and use of your PI over the past 12 months, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights below), we will disclose to you:

- The categories of PI we collected about you.
- The categories of sources for the PI we collected about you.
- Our business or commercial purpose for collecting or selling that PI.
- The categories of third parties with whom we share that PI.
- Upon request, the specific pieces of PI we collected about you (also called a data portability request).
- If we disclosed your PI for a business purpose, a list disclosing:
  - disclosures for a business purpose, identifying the PI categories that each category of recipient obtained.

### *Deletion, Rectification and Restriction Request Rights*

Subject to certain exceptions under the law, you have the right to request that we delete, rectify or restrict our use of any of your PI that we collected from you and retained. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, Rectification, Restriction and Deletion Rights below), we will delete (and direct our Service Providers to delete) your PI from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our Service Providers to:

1. Complete the transaction for which we collected the PI, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
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 information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.



7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

#### *Exercising Access, Data Portability, Rectification, Restriction and Deletion Rights*

To exercise the access, data portability, rectification, restriction and deletion rights described above, please submit a verifiable consumer request to us at [dpo@MWLpdx.com](mailto:dpo@MWLpdx.com). Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your PI. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. We will only use PI provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

#### **Non-Discrimination**

We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not do any of the following based on your rights:

- Deny you services.
- Charge you different prices or rates for services.
- Provide you a different level or quality of services.

#### **Other California Privacy Rights**

We do not track users over time and across our services; therefore, we do not respond to Do Not Track signals. California Civil Code Section § 1798.83 permits website users that are California residents to request certain information regarding the disclosure of personal data to third parties for direct marketing purposes. To make such a request, please contact us at [dpo@MWLpdx.com](mailto:dpo@MWLpdx.com).

#### **How Long Do We Retain Your Personal Information?**

***In Short:** We keep your Personal Information for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless otherwise required by law.*

We will only keep your Personal Information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it, or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

#### **Is Your Personal Information Secure?**

***In Short:** We aim to protect your Personal Information through a system of organizational and technical security measures, including encryption as required by law.*

As required by law, we encrypt any Personal Information during transfers or any movement of it to our Service Providers or whenever otherwise required contractually, by law or order. In addition, we have implemented appropriate technical and organizational security measures designed to protect the security of any Personal Information we process, including periodic risk assessments.

Please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your Personal Information, transmission of Personal Information to and from our Site is at your own risk. You should only access the Site within a secure environment.

### **What Happens When There Are Changes to this Privacy Policy?**

***In Short:*** *We may update this Privacy Policy from time to time, so you should review it periodically for updates or review it if you receive a notice of update from us.*

The effective date of this Privacy Policy appears at the top of this page. However, we may update this Privacy Policy from time to time. It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat your Personal Information, we will notify you by email to the email address specified in your account or through a notice on the Site home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this Privacy Policy to check for any changes.

### **What If I Have Questions or Concerns?**

If you have any questions or concerns regarding privacy using the Site, please send us a detailed message to [dpo@MWLpdx.com](mailto:dpo@MWLpdx.com). We will make every effort to resolve your concerns.