

Effective date: March 27, 2024

At Cirkul, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. **By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.**

Remember that your use of Cirkul's Services is at all times subject to our Terms of Service <https://drinkcirkul.com/pages/terms>, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use

You may print a copy of this Privacy Policy by clicking [here](#). If you have a disability, you may access this Privacy Policy in an alternative format by contacting privacy@drinkcirkul.com.

Privacy Policy Table of Contents

- [What this Privacy Policy Covers](#)
- [Personal Data](#)
 - [Categories of Personal Data We Collect](#)
 - [Categories of Sources of Personal Data](#)
 - [Our Commercial or Business Purposes for Collecting Personal Data](#)
- [How We Disclose Your Personal Data](#)
- [Tracking Tools, Advertising and Opt-Out](#)
- [Data Security and Retention](#)
- [Personal Data of Children](#)
- [California Resident Rights](#)
- [Virginia Resident Rights](#)
- [Colorado Resident Rights](#)
- [Connecticut Resident Rights](#)
- [Exercising Your Rights Under the State Privacy Laws](#)
- [Other State Law Privacy Rights](#)
- [Changes to this Privacy Policy](#)
- [Contact Information](#)

What this Privacy Policy Covers

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

Personal Data

Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months for the detailed purposes, each described further in the “Our Commercial or Business Purposes for Collecting or Disclosing Personal Data” section below:

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties To Whom We Disclose this Personal Data</u>	<u>Purpose(s) for Collection</u>
Account Data	<ul style="list-style-type: none"> Account name and password First and last name Email Postal address Phone number Date of birth 	<ul style="list-style-type: none"> Service Providers Advertising Partners Business Partners Parties You Authorize, Access or Authenticate 	<ul style="list-style-type: none"> Providing, Customizing and Improving the Services Corresponding with You Meeting Legal Requirements
Payment Data	<ul style="list-style-type: none"> Credit or debit card number Expiration Date Billing address, phone number, and email 	<ul style="list-style-type: none"> Service Providers (specifically our payment processing partner, currently Shopify, Recharge and Braintree) 	<ul style="list-style-type: none"> Providing, Customizing and Improving the Services Meeting Legal Requirements
Commercial Data	<ul style="list-style-type: none"> Purchase history Consumer profiles 	<ul style="list-style-type: none"> Service Providers Advertising Partners Business Partners Parties You Authorize, Access or Authenticate 	<ul style="list-style-type: none"> Providing, Customizing and Improving the Services Marketing the Services Corresponding with You

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties To Whom We Disclose this Personal Data</u>	<u>Purpose(s) for Collection</u>
Web Analytics	<ul style="list-style-type: none"> • Web page interactions • Referring webpage/source through which you accessed the Services • Non-identifiable request IDs • Statistics associated with the interaction between device or browser and the Services 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Business Partners • Parties You Authorize, Access or Authenticate 	<ul style="list-style-type: none"> • Meeting Legal Requirements • Providing, Customizing and Improving the Services • Marketing the Services • Corresponding with You • Meeting Legal Requirements
Social Network Data	<ul style="list-style-type: none"> • Email • Phone number • User name • IP address • Device ID 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Business Partners • Parties You Authorize, Access or Authenticate 	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Services • Marketing the Services • Corresponding with You • Meeting Legal Requirements
Consumer Demographic Data	<ul style="list-style-type: none"> • Age / date of birth • Gender • Shopping preferences and consumer categories • Information about your health and fitness preferences and interests • Cultural, social and political identifiers (for example, veteran status, affiliations and interests) 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Business Partners • Parties You Authorize, Access or Authenticate 	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Services • Marketing the Services • Corresponding with You • Meeting Legal Requirements

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties To Whom We Disclose this Personal Data</u>	<u>Purpose(s) for Collection</u>
Geolocation Data	<ul style="list-style-type: none"> • IP-address-based location information 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Business Partners • Parties You Authorize, Access or Authenticate 	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Services • Marketing the Services • Meeting Legal Requirements
Categories of Data that may be Considered “Sensitive”	<ul style="list-style-type: none"> • Race or ethnic origin • Religion 	<ul style="list-style-type: none"> • Service Providers • Business Partners • Parties You Authorize, Access or Authenticate 	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Services • Marketing the Services • Meeting Legal Requirements
Inferences Drawn From Other Personal Data Collected	<ul style="list-style-type: none"> • Profiles reflecting user attributes • Profiles reflecting user behavior 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Business Partners • Parties You Authorize, Access or Authenticate 	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Services • Marketing the Services • Corresponding with You • Meeting Legal Requirements
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> • Identifying information in emails or other communications you send us 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Business Partners • Parties You Authorize, Access or Authenticate 	<ul style="list-style-type: none"> • Providing, Customizing and Improving the Services • Marketing the Services • Corresponding with You • Meeting Legal Requirements

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- **You**
 - When you provide such information directly to us.
 - When you create an account or use our interactive tools and Services.
 - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.
 - When you purchase something from our online store, as part of the buying and selling process.
 - When you send us an email or otherwise contact us.
 - When you use the Services and such information is collected automatically.
 - Through Cookies (defined in the “Tracking Tools, Advertising and Opt-Out” section below).
 - If you browse our online store or use a location-enabled browser, we may receive information about your browser, operating system, location and mobile device, as applicable.
- **Third Parties**
 - Vendors
 - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
 - We may use vendors to obtain information to generate leads and create user profiles.
 - Advertising Partners
 - We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.
 - Social Networks
 - If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.

Our Commercial or Business Purposes for Collecting or Disclosing Personal Data

- **Providing, Customizing and Improving the Services**
 - Creating and managing your account or other user profiles.

- Processing orders or other transactions; billing.
- Providing you with the products, services or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the Services.
- Allowing you to access and manage current and past orders through the Services.
- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (together, the “CCPA”), the Virginia Consumer Data Protection Act (the “VCDPA”), the Colorado Privacy Act (the “CPA”), and the Connecticut Data Privacy Act (the “CTDPA”).
- **Marketing the Services**
 - Marketing and selling the Services as well as our online store, new products and other updates (including checkout reminders).
 - Showing you advertisements, including interest-based or online behavioral or targeted advertising.
- **Corresponding with You**
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Cirkul or the Services.
 - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
 - Protecting the rights, property or safety of you, Cirkul or another party.
 - Enforcing any agreements with you.
 - Responding to claims that any posting or other content violates third-party rights.
 - Resolving disputes.

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

As noted in the list above, we may communicate with you if you've provided us the means to do so. For example, if you've given us your email address, we may send you promotional email offers or email you about your use of the Services. If you do not want to receive communications from us, please indicate your preferences by emailing us at privacy@drinkcirkul.com.

How We Disclose Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a "sale" of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers, including but not limited to text messaging service providers.
 - Security and fraud prevention consultants.
 - Analytics providers.
 - Support and customer service vendors.
 - Product fulfillment and delivery providers.
 - Payment processors.
 - Our payment processing partners Shopify, Recharge and Braintree collect your voluntarily-provided payment card information necessary to process your payment.
 - Please see Shopify's [terms of service](#) and [privacy policy](#) for information on its use and storage of your Personal Data.
 - Please see Recharge's [terms of service](#) and [privacy policy](#) for information on its use and storage of your Personal Data.

- Please see Braintree's [payment services agreement](#) and [privacy policy](#) for information on its use and storage of your Personal Data.
- **Advertising Partners.** These parties help us market our services and provide you with other offers that may be of interest to you. They include:
 - Ad networks.
 - Marketing providers.
 - Data cooperatives.
- **Business Partners.** These parties partner with us in offering various services. They include:
 - Businesses that you have a relationship with.
 - Companies that we partner with to offer joint promotional offers or opportunities.
- **Parties You Authorize, Access or Authenticate**
 - Third parties you access through the services.
 - Social media services.
 - Other parties authorized by you.

Legal Obligations

We may disclose any Personal Data that we collect to third parties in conjunction with any of the activities set forth under "Meeting Legal Requirements and Enforcing Legal Terms" in the "Our Commercial or Business Purposes for Collecting Personal Data" section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and disclose it to third parties for our lawful business purposes,

including to analyze, build and improve the Services and promote our business, provided that we will not disclose such data in a manner that could identify you.

Tracking Tools, Advertising and Opt-Out

The Services use cookies and similar technologies such as pixel tags, including the Meta Pixel, web beacons, clear GIFs and JavaScript (collectively, "Cookies") as well as session replay, chat bot and similar technology to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, understand usage patterns, provide customer support, learn about our user base and operate and improve our Services. Cookies are small pieces of data – usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and across different websites. Please note that because of our use of Cookies, the Services do not support "Do Not Track" requests sent from a browser at this time. To find out more about "Do Not Track," you can visit www.allaboutdnt.com.

We use the following types of Cookies:

- **Essential Cookies**. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- **Functional Cookies**. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Performance/Analytical Cookies**. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and

the Services' content for those who engage with our advertising. For example, Google Inc. ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and disclose information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google's use of Cookies by visiting the Google advertising opt-out page at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

- **Retargeting/Advertising Cookies**. Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you. For more information about this, please see the section below titled "Information about Interest-Based Advertisements."

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

Session Replay Technology

We may use session replay technology in order to identify and resolve customer issues, to monitor and analyze how you use our Services, to better understand user behavior, and to improve our Services. By continuing to use the Services, you consent to the use of session replay technology. If you would like to change your settings with respect to session replay technology, you can access your Cookie management settings by clicking here.

Information about Interest-Based Advertisements:

We may serve advertisements, and also allow third-party ad networks, including third-party ad servers, ad agencies, ad technology vendors and research firms, to serve advertisements through the Services. These advertisements may be targeted to users who fit certain general profile categories or display certain preferences or behaviors (“Interest-Based Ads”). Information for Interest-Based Ads (including Personal Data) may be provided to us by you, or derived from the usage patterns of particular users on the Services and/or services of third parties. Such information may be gathered through tracking users’ activities across time and unaffiliated properties, including when you leave the Services. To accomplish this, we or our service providers may deliver Cookies, including a file (known as a “web beacon”) from an ad network to you through the Services. Web beacons allow ad networks to provide anonymized, aggregated auditing, research and reporting for us and for advertisers. Web beacons also enable ad networks to serve targeted advertisements to you when you visit other websites. Web beacons allow ad networks to view, edit or set their own Cookies on your browser, just as if you had requested a web page from their site.

We comply with the Digital Advertising Alliance (“DAA”) Self-Regulatory Principles for Online Behavioral Advertising. Through the DAA and Network Advertising Initiative (“NAI”), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of, and greater control over, ads that are customized based a consumer’s online behavior across different websites and properties. To make choices about Interest-Based Ads from participating third parties, including to opt-out of receiving behaviorally targeted advertisements from participating organizations, please visit the DAA’s or NAI’s consumer opt-out pages, which are located at <http://www.networkadvertising.org/choices/> or www.aboutads.info/choices.

Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as necessary to provide you with our Services or to perform our business or commercial purposes for collecting your Personal Data. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, and the sensitivity of the Personal Data. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

For example:

- We retain your profile information and credentials for as long as you have an account with us.
- We retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively and efficiently.

Personal Data of Children

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at privacy@drinkcirkul.com.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. Except as otherwise specified below, please see the “Exercising Your Rights Under the State Privacy Laws” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are

subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@drinkcirkul.com.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting, selling or sharing your Personal Data.
- The categories of third parties to whom we have disclosed your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data disclosed to each category of third party recipient. If we have sold or shared your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to or shared with each category of third party recipient.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested, or if deletion of your Personal Data involves disproportionate effort. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Correction

You have the right to request that we correct any inaccurate Personal Data we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, if we decide, based on the totality of circumstances related to your Personal Data, that such data is correct. If your correction request is subject to one of these exceptions, we may deny your request.

Processing of Sensitive Personal Information Opt-Out

We collect Personal Data that is considered “Sensitive Personal Information” under the CCPA. Because we use or disclose Sensitive Personal Information for purposes other than those set forth in section 7027(m) of the CCPA regulations, California residents have the right to request that we limit the use or sharing of their Sensitive Personal Information (“Right to Limit”). The Right to Limit allows California residents to direct a business that collects Sensitive Personal Information to limit its use of this information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, to perform the services set forth in paragraphs (2), (4), (5), and (8) of subdivision (e) of Section 1798.140, and as authorized in the CCPA regulations. You may exercise your Right to Limit by using the following methods:

- Email us at privacy@drinkcirkul.com.
- By selecting “Limit Use of Sensitive Data” from the “Request Type” dropdown and completing all other fields of the “Cirkul Data Request Form” available [here](#).

Personal Data Sales and Sharing Opt-Out and Opt-In

In this section, we use the terms ‘sell’ and ‘share’ as they are defined in the CCPA. We sell and share your Personal Data, subject to your right to opt-out of these sales and shares.

As described in the “Tracking Tools, Advertising and Opt-Out” section above, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit. Under the CCPA, sharing your data through third party Cookies for online advertising may be considered a “sale” or “share” of information and California residents have certain rights when a business “sells” or “shares” Personal Data” with a third party, including for purposes of cross-contextual behavioral advertising. You

can opt out of these sales and the sharing of Personal Data by following the instructions in this section.

We may sell or share your Personal Data, including for the purposes of cross-contextual behavioral advertising, to and with the following categories of third parties:

- Advertising Partners.
- Business Partners.
- Parties You Authorize, Access or Authenticate.

Over the past 12 months, we may have sold or shared the following categories of your Personal Data to and with the categories of third parties listed above:

- Account Data
- Commercial Data
- Web Analytics
- Social Network Data
- Consumer Demographic Data
- Geolocation Data
- Other Identifying Information that You Voluntarily Choose to Provide

We may have sold or shared the foregoing categories of Personal Data for the following business or commercial purposes:

- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Marketing and selling the Services.
- Showing you advertisements, including interest-based or online behavioral advertising.

You have the right to opt-out of the selling or sharing of your Personal Data by tracking technologies using the following methods:

- Email us at privacy@drinkcirkul.com.

- By selecting “Do Not Sell or Share to a Third Party” and “Opt Out of Targeted Advertising” from the “Request Type” dropdown and completing all other fields of the “Cirkul Data Request Form” available [here](#).
- By implementing the Global Privacy Control or similar universal privacy control that is legally recognized by a government agency or industry standard and that complies with the CCPA. The signal issued by the control must be initiated by your browser and applies to the specific device and browser you use at the time you cast the signal. Please note this does not include Do Not Track signals.

You have the right to opt-out of the selling or sharing of your Personal Data by any other means using the following methods:

- Email us at privacy@drinkcirkul.com.
- By selecting “Do Not Sell or Share to a Third Party” and “Opt Out of Targeted Advertising” from the “Request Type” dropdown and completing all other fields of the “Cirkul Data Request Form” available [here](#).
- By implementing the Global Privacy Control or similar universal privacy control that is legally recognized by a government agency or industry standard and that complies with the CCPA. The signal issued by the control must be initiated by your browser and applies to the specific device and browser you use at the time you cast the signal. Please note this does not include Do Not Track signals.

Once you have submitted an opt-out request, we will not ask you to reauthorize the sale or sharing of your Personal Data for at least 12 months.

To our knowledge, we do not sell the Personal Data of minors under 16 years of age.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

Our Financial Incentive Program

From time to time, we may offer financial incentives, including granting you points in our Inner Cirkul rewards program, for the collection of your Personal Data, the sale of your Personal Data, the sharing of your Personal Data, or the deletion of your Personal Data. These financial incentives include you providing us with certain Personal Data (such as answers to Inner Cirkul survey questions) in exchange for points which can be used towards Cirkul products and other promotional opportunities. For the terms and conditions applicable to the Inner Cirkul rewards program, please see our [Inner Cirkul Terms and Conditions](#).

Colorado Resident Rights

If you are a Colorado resident, you have the rights set forth under the CPA. Please see the “Exercising Your Rights Under the State Privacy Laws” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a Colorado resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@drinkcirkul.com.

Access

You have the right to request confirmation of whether or not we are processing your Personal Data and to access your Personal Data.

Correction

You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Deletion

You have the right to delete your Personal Data.

Portability

You have the right to request a copy of your Personal Data in a machine-readable format, to the extent technically feasible, twice within a calendar year.

Personal Data Sales and Targeted Advertising Opt-Out and Opt-In

In this section, we use the term 'sell' as it is defined in the CPA. We sell and process for the purposes of targeted advertising your Personal Data, subject to your right to opt-out of these sales.

As described in the "Tracking Tools, Advertising and Opt-Out" section above, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit. Under the CPA, sharing your data through third party Cookies for online advertising may be considered a "sale" of information. You can opt out of these sales by following the instructions in this section.

We may sell and process for the purposes of targeted advertising your Personal Data to the following categories of third parties:

- Advertising Partners.
- Business Partners.
- Parties You Authorize, Access or Authenticate.

We may sell and process for the purposes of targeted advertising the following categories of your Personal Data to categories of third parties listed above:

- Account Data
- Commercial Data
- Web Analytics
- Social Network Data
- Consumer Demographic Data
- Geolocation Data
- Inferences Drawn From Other Personal Data Collected
- Other Identifying Information that You Voluntarily Choose to Provide

We may have sold the foregoing categories of Personal Data for the following business or commercial purposes:

- Improving the Services, including testing, research, internal analytics and product development.
- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Marketing and selling the Services.
- Showing you advertisements, including interest-based or online behavioral advertising.

You have the right to opt-out of the sale or processing for the purposes of targeted advertising of your Personal Data by tracking technologies using the following methods:

- Email us at privacy@drinkcirkul.com
- By selecting “Do Not Sell or Share to a Third Party” and “Opt Out of Targeted Advertising” from the “Request Type” dropdown and completing all other fields of the “Cirkul Data Request Form” available [here](#).
- By implementing the Global Privacy Control or similar universal privacy control that is legally recognized by a government agency or industry standard and that complies with the CPA. The signal issued by the control must be initiated by your browser and applies to the specific device and browser you use at the time you cast the signal. Please note this does not include Do Not Track signals.

You have the right to opt-out of the sale or processing for the purposes of targeted advertising of your Personal Data by any other means using the following methods:

- Email us at privacy@drinkcirkul.com
- By selecting “Do Not Sell or Share to a Third Party” and “Opt Out of Targeted Advertising” from the “Request Type” dropdown and completing all other fields of the “Cirkul Data Request Form” available [here](#).
- By implementing the Global Privacy Control or similar universal privacy control that is legally recognized by a government agency or industry standard and that complies with the CPA. The signal issued by the control must be initiated by your browser and applies to the specific device and

browser you use at the time you cast the signal. Please note this does not include Do Not Track signals.

Our Bona Fide Loyalty Program

From time to time, we may offer benefits to you for the sale of your Personal Data or the processing of your Personal Data for targeted advertising as part of our Bona Fide Loyalty Program, as defined in the CPA ("Benefits"). For more information on our Bona Fide Loyalty Program, please see our Inner Cirkul Terms and Conditions, located [here](#).

Connecticut Resident Rights

If you are a Connecticut resident, you have the rights set forth under the CTDPA. Please see the "Exercising Your Rights Under the State Privacy Laws" section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers' end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a Connecticut resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@drinkcirkul.com.

Access

You have the right to request confirmation of whether or not we are processing your Personal Data and to access your Personal Data.

Correction

You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Deletion

You have the right to delete your Personal Data.

Portability

You have the right to request a copy of your Personal Data that is processed automatically in a machine-readable format, to the extent technically feasible.

Personal Data Sales and Targeted Advertising Opt-Out and Opt-In

In this section, we use the term 'sell' as it is defined in the CTDPA. We sell and process for the purposes of targeted advertising your Personal Data, subject to your right to opt-out of these sales.

As described in the "Tracking Tools, Advertising and Opt-Out" section above, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit. Under the CTDPA, sharing your data through third party Cookies for online advertising may be considered a "sale" of information. You can opt out of these sales by following the instructions in this section.

You have the right to opt-out of the sale or processing for the purposes of targeted advertising of your Personal Data. You can opt-out using the following methods:

- Email us at privacy@drinkcirkul.com
- By selecting "Do Not Sell or Share to a Third Party" and "Opt Out of Targeted Advertising" from the "Request Type" dropdown and completing all other fields of the "Cirkul Data Request Form" available [here](#).
- By implementing the Global Privacy Control or similar universal privacy control that is legally recognized by a government agency or industry standard and that complies with the CTDPA. The signal issued by the control must be initiated by your browser and applies to the specific device and browser you use at the time you cast the signal. Please note this does not include Do Not Track signals.

Virginia Resident Rights

If you are a Virginia resident, you have the rights set forth under the VCDPA. Please see the "Exercising Your Rights Under the State Privacy Laws" section below for

instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers' end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require us to deny your request.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a Virginia resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at privacy@drinkcirkul.com.

Access

You have the right to request confirmation of whether or not we are processing your Personal Data and to access your Personal Data.

Correction

You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Portability

You have the right to request a copy of your Personal Data in a machine-readable format, to the extent technically feasible.

Deletion

You have the right to delete your Personal Data.

Opt-Out of Certain Processing Activities

- You have the right to opt-out of the processing of your Personal Data for targeted advertising purposes. We process your Personal Data for targeted advertising purposes. To opt-out of our processing of Personal Data for targeted advertising purposes, please:
 - Email us at privacy@drinkcirkul.com
 - By selecting "Do Not Sell or Share to a Third Party" and "Opt Out of Targeted Advertising" from the "Request Type" dropdown and

completing all other fields of the “Cirkul Data Request Form” available [here](#).

- o By implementing the Global Privacy Control or similar universal privacy control that is legally recognized by a government agency or industry standard and that complies with the VCDPA. The signal issued by the control must be initiated by your browser and applies to the specific device and browser you use at the time you cast the signal. Please note this does not include Do Not Track signals.
- You have the right to opt-out to the sale of your Personal Data. We do not currently sell your Personal Data as defined under the VCDPA.
- You have the right to opt-out from the processing of your Personal Data for the purposes of profiling in furtherance of decisions that produce legal or similarly significant effects to you, if applicable.

Exercising Your Rights under the State Privacy Laws

Submitting a Valid Request

To exercise the rights described in this Privacy Policy, you or, if you are a California, Colorado or Connecticut resident, your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within the time period required by applicable law. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Email us at: privacy@drinkcirkul.com
- By completing the “Cirkul Data Request Form” available [here](#).

If you are a California, Colorado or Connecticut resident, you may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

Appealing a Denial

If we refuse to take action on a Valid Request within a reasonable period of time after receiving your request in accordance with this section and you are in Colorado, Connecticut or Virginia, you may appeal our decision. In such appeal, you must (1) provide sufficient information to allow us to verify that you are the person about whom the original request pertains and to identify the original request, and (2) provide a description of the basis of your appeal. Please note that your appeal will be subject to your rights and obligations afforded to you under the CPA, CTDPA or VCDPA, as applicable. If you are in Colorado, we will respond to your appeal within 45 days of receiving your request. If you are in Connecticut or Virginia, we will respond to your appeal within 60 days of receiving your request. If we deny your appeal, you have the right to contact the Colorado Attorney General, the Connecticut Attorney General or the [Virginia Attorney General](#), as applicable.

You may appeal a decision by us using the following methods:

- Email us at: privacy@drinkcirkul.com (title must include “Request Denial Appeal”)

Other State Law Privacy Rights

California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at privacy@drinkcirkul.com.

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at privacy@drinkcirkul.com with the subject

line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

Changes to this Privacy Policy

We’re constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the drinkcirkul.com website, by sending you an email and/or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information:

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- drinkcirkul.com
- privacy@drinkcirkul.com
- 4914 Joanne Kearney Blvd. Tampa, FL 33619