

## Privacy Policy

Updated April 24, 2020

Zephyr Green Coffee LLC (“Zephyr Coffee”) is committed to protecting your privacy. This Privacy Policy (“Policy”) applies to your interaction and communication with Zephyr Coffee, including in person, by phone, through mail or email or through the website <http://zephyrcoffee.com> and any other Zephyr Coffee-owned and/or operated websites, mobile sites, mobile applications or social media accounts (collectively, our “Sites”) and our practices for collecting, using, maintaining, protecting, and disclosing your personal information.

This Policy applies to information we collect:

- On our Sites.
- In e-mail, text and other electronic messages between you and Zephyr Coffee that are related to the services that Zephyr Coffee is providing you.
- Through mobile and desktop applications you download from our Sites or from applications marketplaces.
- In person, by phone or through mail, including from parties that interact with Zephyr Coffee directly (our customers or service providers, or other individuals that request information or otherwise voluntarily provide us with their information).

It does not apply to information collected by any third-party, including through any application or content (including advertising) that may link to or be accessible from or on our Sites.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with any term in this Policy, please do not access or use the Sites. If you choose not to provide certain information, you may not be able to access particular areas of our Sites, or contact us through e-mail. By accessing or using our Sites or otherwise disclosing to us information, you agree to this Policy.

### **INFORMATION THAT WE COLLECT**

**Information You Voluntarily Submit to the Sites:** We may collect several types of information from our users such as name, street address, telephone number, screen name, and email address. We collect the content you submit to the Sites.

**Automatically-Collected Information:** We automatically collect certain information about you and the device with which you access the Sites. For example, when you use our Sites, we may log your IP address, operating system type, browser type, referring website, pages you viewed, and the dates/times when you accessed the Sites. We may also collect information about actions you take when using the Sites, such as links clicked.

**Information Collected Through Cookies:** We may use tracking technologies, including cookies, to collect information about you when you interact with our Sites. Cookies are small data files stored on your hard drive or in device memory that help us improve the Sites and your experience, see which areas and features of the Sites are popular, and count visits. We may use both session cookies, which expire when you close your browser, and persistent cookies, which stay on your browser until deleted. Most web browsers are set to accept cookies by default. You may deactivate or restrict the transmission of cookies by changing the settings of your web browser. Please note that if you choose to remove or deactivate certain cookies, you may not be able to use all of the functions of the Sites.

**Information We Collect from Others:** We may receive information about you from other sources. For example, if you use a third-party software through the Sites, they may transfer information to us for fulfillment. This Policy does not apply to information collected through or by any third-party. If you have any questions about such third parties' privacy practices, you should review their privacy policies.

Generally, no one is under a statutory or contractual obligation to provide any information. However, certain information is collected automatically and, if certain information is not provided by you, Zephyr Coffee may not be able to provide services or access to the Sites.

## **HOW WE USE INFORMATION**

Zephyr Coffee may use your personal information for various purposes related to our business and your use of the Sites. For example, we may use your information in the following ways:

- For site and system administration such as administrative e-mails, confirmation e-mails, technical support and notices, updates on policies, security alerts and verification of activity on the Sites.
- To conduct research and development to enhance, evaluate, and improve the Sites and our services to you.
- To send you promotional information, such as newsletters.
- To respond to your comments or inquiries.
- To track and measure our Sites' performance.
- To review the effectiveness of our marketing programs and analyze other general demographic trends.
- Provide, maintain and improve our Sites and provide you with relevant information and content.
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Zephyr Coffee and others.
- To notify you of new information or services that may be of interest to you.
- To send promotional materials.
- To comply with legal and regulatory requirements, required disclosures and choices and controls that may be available.
- To personalize online or mobile content and user experiences.
- To perform operational functions in connection with our business, including data analysis, audits, developing and improving products and services, enhancing the Sites and identifying usage trends.
- Link or combine with information we get from others to help understand your needs and provide you with a better experience.

- Carry out any other purpose described to you at the time the information was collected.

We also may use aggregated or de-identified information, which cannot reasonably be used to identify you. Once de-identified and aggregated so that data does not personally identify you (for example, we may aggregate data in order to improve our automation and improve customer care), it is no longer personal information. Such de-identified and/or aggregated information which does not identify individuals is not subject to this Policy.

### **SHARING OF INFORMATION**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Zephyr Coffee's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Zephyr Coffee is among the assets transferred.
- To fulfill the purpose for which you provide it. For example, if you sign up to receive email communications from us, we collect your email address and any related information you provide. If you sign up to receive phone or SMS text message communications from us, we collect your phone number and any related information you provide.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

Regardless of your opt out or profile preferences, we may also disclose your personal information:

- To comply with any court order, law or legal process, including to respond to any government or regulatory request.
- To enforce any agreement we may have with you.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Zephyr Coffee, our customers or others.

Zephyr Coffee may partner with third parties to manage Zephyr Coffee's advertising on other sites or provide products and resources to its customers. These third-party providers may use cookies or similar technology in order to provide you advertising based on your browsing activities and interests. If you wish to opt out of interest based advertising and are located in the European Union, the European Economic Area and their member states, Switzerland or the United Kingdom, please contact our [Marketing](#) department.

Zephyr Coffee may use the following third-party service providers:

- **Analytics:** Zephyr Coffee uses various marketing tools that help us create a better user experience for people visiting the Sites. These tools allow us to look at aggregated de-identified data such as clicks, and allow us to run tests to determine which pages result in the best actions. We may also use Google Analytics and other service providers to collect information regarding visitor behavior and visitor demographics on our services. For more information about Google Analytics, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). You can opt out of Google's collection and processing of data generated by your use of our services by going to <http://tools.google.com/dlpage/gaoptout>.
- **Surveys:** Periodically, we may invite you to complete a voluntary survey. All surveys are completed through Survey Monkey. All survey responses may be submitted anonymously and only your IP address is stored. You may voluntarily enter your name and e-mail address. All data submitted through Survey Monkey is stored on their servers and is subject to the [Survey Monkey privacy policy](#).

California residents may have additional rights regarding the collection and disclosure of their personal information. Please refer to the supplemental notice for California residents found on our Site entitled "Privacy Notice for California Residents".

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to: 877-569-1595 or [zephyrinfo@ldcom.com](mailto:zephyrinfo@ldcom.com). However, please know Zephyr Coffee does not currently sell data triggering this Nevada statute's opt-out requirements.

### **COMMITMENT TO DATA SECURITY**

The security and confidentiality of your information is important to Zephyr Coffee. Zephyr Coffee works hard to protect information you provide from loss, misuse or unauthorized access or disclosure, and follows generally accepted industry standards to protect the personal data submitted to Zephyr Coffee, both during transmission and once it is received. Zephyr Coffee has implemented appropriate technical and organizational measures to ensure a level of security appropriate to the risk. Given the nature of communications and information processing technology, Zephyr Coffee cannot guarantee that information, during transmission or while stored on Zephyr Coffee's systems or otherwise in its care, will be absolutely safe from intrusion by others. It is important that you protect against unauthorized access to your account information and to your computer.

Generally, information will be retained by Zephyr Coffee during the duration the data collector is a customer of Zephyr Coffee, unless you otherwise request deletion or destruction of your information, and thereafter for 10 years. Zephyr Coffee may retain your account information for as long as your account is active or as needed to provide you services, comply with Zephyr Coffee's legal obligations, resolve disputes and enforce an agreement you're a party to. Notwithstanding the foregoing, Zephyr Coffee may keep any data after the periods set forth herein to the extent such data is anonymized.

The Sites are hosted in the United States and are subject to U.S. law, and are intended for users located only in the U.S. If you are accessing the Sites from outside the United States, please be advised that U.S. law may not offer the same privacy protections as the laws of your jurisdiction. By accessing and using the Sites, you consent to the transfer to and processing of your personal information in the U.S.

### **CHILDREN'S INFORMATION**

Zephyr Coffee does not knowingly collect any personally identifiable information from children under the age of 13. If you are under 13, do not use or provide any information on the Sites or through any of its features, use any of the interactive or public comment features of the Sites, or provide any information about yourself to us, including your name, address, telephone number or email address. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If a parent or guardian believes that Zephyr Coffee has personal information of a child under the age of 13 in its database, please contact us at [zephyrinfo@ldcom.com](mailto:zephyrinfo@ldcom.com) to request to review or delete the personal information of a child under the age of 13 or to refuse to allow further collection or use of a child's personal information.

California residents under 16 years of age may have additional rights regarding the collection and disclosure of their personal information. Please refer to the supplemental notice for California residents found on our Site entitled "Privacy Notice for California Residents".

### **CHANGES TO THIS POLICY**

It is our policy to post any changes we make to this Policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date this Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Sites and reviewing this Policy to check for any changes.

### **CONTACT US**

If you have questions or comments regarding use of the Sites or this Policy, you may contact [zephyrinfo@ldcom.com](mailto:zephyrinfo@ldcom.com).