

# Four Roses Distillery LLC

## Privacy Policy

Effective date: July 1, 2020

Last updated: July 1, 2023

Our privacy policy is available in PDF form [here](#).

At Four Roses Distillery LLC we respect your privacy and are committed to protecting it.

This privacy policy has been written to explain how Four Roses Distillery LLC (“Four Roses”) collects, uses, discloses, and protects information that we collect about you and your rights with respect to that information.

This policy covers information we collect from or about you when you give it to us, visit our website, visit any of our locations, or interact with our advertisements. It also covers information that we may receive from other persons or companies who have received your information and can share it with us.

If in any case our privacy practices differ from those explained in this policy, we will let you know you at the time we ask for or collect your information.

### 1. Quick links

- [What information we collect about you](#)
- [Our products and website are for users over the age of 21](#)
- [How we collect your information](#)
- [Cookies and automatic data collection technologies](#)
- [How we use your information](#)
- [Disclosure of your information](#)
- [Interest-based advertising](#)
- [Third party content, apps, and links](#)
- [Your rights and choices](#)
- [Data security](#)
- [Your California privacy rights](#)
- [Nevada privacy](#)
- [Changes to our privacy policy](#)
- [Contact Us](#)

### 2. What information we collect

We may collect the following types of information about you, which we have grouped together as follows:

- **Identity Information.** Examples include first name, last name, marital status, title, date of birth and gender.
- **Contact Information.** Examples include billing address, shipping address, email address and telephone numbers.
- **Government-Issued Identification Information.** In connection with a visit to one of our locations or purchase of one of our products, we may collect your drivers’ license number or passport number. Government-issued identification information is not stored by Four Roses in any manner.

- **Financial Information.** Examples include payment card details and other payment-related information.
- **Transaction Information.** Examples include details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Information.** Examples include internet protocol (IP) address, your login information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Information.** Examples include your username and password, purchases or orders made by you, your interests, your wish list, preferences, feedback and survey responses.
- **Usage Information.** Examples include information about how you use our website, products and services.
- **Marketing and Communications Information.** Examples include your preferences in receiving marketing from us and third parties and your communication preferences.
- **Demographic Information and Preferences.** Examples include personal characteristics and preferences, such as your age, gender, veteran or military status, shopping preferences, loyalty and rewards program information, household demographic data, data from social media platforms, education and professional information, hobbies and interests and propensity scores from third parties (likelihood of purchase, experiencing a life event, etc.).
- **User Content.** Examples include product reviews and other feedback that you provide on our products, locations, and services. If you choose to provide User Content, it may be made available on public areas of our website.

Some of the information we collect about you may be personal information, or personal data, that can be used to identify you including, for example, your name, email address, mailing address or delivery address. In some jurisdictions, certain unique identifiers like IP addresses and other usage or technical information may be considered personal information. Personal information does not include data where your identity has been removed so that we can no longer identify you (anonymous data), which we may use for any purpose.

### **3. Our products and website are for users over the age of 21**

Four Roses is committed to safe, responsible drinking. Our website as well as our products are intended individuals who are over the age of 21. We do not knowingly collect personal information from, persons under the age of 21 through our website. If you are under the age of 21 and you have indicated that you are over the age of 21 in order to access our website, you must stop using our website. Under no circumstances may you submit personal information through our website if you are under 21 years of age. If we learn that we have collected personal information from anyone under the age of 21, we will delete that information. If you believe we might have any information from or about someone who is under the age of 21, please contact us using our [Contact Us](#) page.

Although persons under the age of 21 are permitted to visit and tour our locations and facilities, persons under the age of 21 are not permitted to participate in tastings. For additional information on planning a visit, see our [Frequently Asked Questions](#).

#### 4. How we collect your information

We collect information from and about you in the following ways:

- **When you provide it to us.** You may give us information about you by filling in forms or by communicating with us by email or otherwise. For example, this may include information you provide when you register for an account, subscribe to one of our newsletters or other communications, enroll our loyalty program, place an order, participate in one of our events, write a review, or when you otherwise contact us about our website, products, or services. We may also collection information from you if you sign up for a tour at one of our locations or complete a visitor comment card.
- **From our websites and emails.** As you interact with our website, websites using our cookies, or our emails, we may automatically collect information about your equipment, browsing actions, other activities (like opening emails and accessing links), and patterns. We collect this information by using cookies, server logs, web beacons, and other similar technologies. Our [Cookies and automatic data collection technologies](#) section contains more information and options to control or opt-out of certain data collection or uses.
- **From others.** We may receive information about you from third parties including, for example, our affiliated companies, business partners, subcontractors, analytics providers, and service providers. For example, if you purchase tickets to an event that we will be attending through one of our business partners or to a co-branded event through a co-sponsor, these third parties may provide us with information about you. If your someone else signs up for a group tour of one of our locations, the person who signed you up may provide us with information about you.

#### 5. Cookies and automatic data collection technologies

Our website uses automatic data collection technologies to distinguish you from other website users. This helps us deliver a better and more personalized service when you browse our website. It also allows us to improve our website by enabling us to:

- Estimate our audience size and usage patterns.
- Store your preferences so we may customize our website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our website.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). For more information, see the [Interest-based advertising](#) section of this privacy policy.

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

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. For information about managing browser settings to refuse cookies, see [Your rights and choices](#).
- **Flash Cookies.** Certain features of our website may use Flash cookies (local stored objects) instead of browser cookies to collect and store information about your preferences and navigation to, from, and on the website. For information about managing Flash cookies see [Your rights and choices](#).

- **Web Beacons.** Our website pages, advertisements, and e-mails may contain small transparent embedded images or objects known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count website page visitors or email readers, or to compile other similar statistics such as recording website content popularity or verifying system and server integrity. For information about managing web beacons, see [Your rights and choices](#).

Depending on which website this notice is posted on, we may use Google Analytics to provide certain analytics services for us. More information about Google Analytics can be found in the [Google Analytics Terms of Use](#) and the [Google Analytics Privacy Policy](#).

We do not respond to or honor “do not track” (a/k/a DNT) signals or similar mechanisms transmitted by web browsers.

## 6. How we use your information

We may use your information to conduct our business operations including for the following purposes:

- To verify you are of legal age to use our products and services.
- To create an account to register you as a new customer, enroll you in our rewards program, book you for a tour of one of our locations, or to reserve space for you at one of our events.
- To provide you with products and services you request or purchase from us, including through our rewards program
- To manage our relationship with you which may include notifying you about changes to our terms or privacy policy, providing you notices about your account, asking you to leave a review or take a survey, addressing any concerns you may have about our products or services.
- To contact you for or conduct market research
- To provide you with the information or support that you request from us, including to send you newsletters.
- To allow you to enter a sweepstake, contest or promotion that we may offer.
- To improve our website, products or services, marketing, customer relationships, and experiences.
- To notify you of special offers and products and services that we think may be of interest to you. To learn more about your choices with regards to these communications see [Your rights and choices](#).
- To carry out our obligations and enforce our rights and to protect our websites, customers, and other individuals.
- For any other purpose as may be permitted by law or that we describe when you provide the information.

We may use information that is not personal information for any purpose. For example, we may aggregate usage data from many people in a way that does not identify any individuals to calculate the percentage of users accessing a feature on the website.

## 7. Disclosure of Your Information

We may share non-personal information without restriction. We may share your personal information with:

- Any member of our corporate group, which means our subsidiaries, affiliates, our ultimate holding company and its subsidiaries, and affiliates.
- To contractors, service providers, business partners, and other third parties we use to support our business.
- To event organizers, so that they can invite you to an event where we will be present.
- To public or government (including enforcement) authorities.
- To an actual or prospective buyer or other successor in the event of merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, where one of the transferred assets is the personal information we hold.
- If we offer a co-branded promotion, to our co-sponsor.
- To fulfill the purpose for which you provide it.
- For any other purpose as may be permitted by law or that we describe when you provide the information.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request.
- To enforce our [Terms of Use](#) and other agreements with you.
- To protect the rights, property, or safety of our business, our employees, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of cybersecurity, fraud protection and credit risk reduction.
- To investigate suspected violations of any law, rule or regulation, or the terms or policies for our website.

We may also use your information to contact you about our own and third-parties' products and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your account profile or opt-out as directed when you receive such an email from us. For more information, see [Your rights and choices](#).

## 8. Interest-based advertising

Some content or applications on our website, including advertisements, are served by third parties, including advertisers, ad networks, and servers, content partners, or application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. Our partners may use non-cookie technologies on which browser settings that block cookies might have

no effect. Your browser may not permit you to block such technologies. For this reason, keep in mind that you can block the collection and use of information related to you by advertising companies for the purpose of serving interest based advertising by visiting the following platforms of self-regulatory programs of which those companies are members:

- The NAI's opt-out platform is available [here](#).
- The DAA's opt-out platform is available [here](#).

## 9. Third party content, apps, and links

Some content or applications on our website may be served by third parties, content providers and application providers including the following:

- Plugins.** Our website may make available the option for you to use "plugins" that are operated by social media companies. If we make this option available, a plugin may collect information about you and send it back to the social media company that owns it. This may happen even if you do not click on the plugin, if you are logged into the social media website that owns the plugin when you visit our website. Information collected by a plugin is subject to the privacy policy and terms of the social media company that makes it. If you do not want the social media company who owns a plugin to collect information about you when you visit our website, please sign out of the social media network before visiting our website.
- User Content.** Our website may allow you to upload your own content to public areas of the website. Any information you submit becomes public information, and we do not control how others may use the content you submit. We are not responsible for uses that may violate our privacy policy, the law, or your intellectual property rights.
- Third-party links.** Our website may contain links to other sites, which we do not control. Those websites have their own privacy policies and terms.

## 10. Your rights and choices

Your rights may vary depending on where you are located. We have created mechanisms to provide you with the following control over your information.

- **Marketing.** If you do not want us to use your email address or other contact information to promote or recommend our own products and services, or third parties' products or services, events hosted or co-sponsored by third-parties, you can opt-out by checking the relevant box located on the form where we collect your contact information, or if presented with the option to opt-in, do not opt-in. If you have an account with our company, you may be able to log in and check or uncheck relevant boxes. If you do not have an account, you can contact us as set forth in the [Contact Us](#) section below to opt-out of further marketing communications or by following the opt-out links on any promotional email we send or otherwise following the instructions within that message. This opt-out may not apply to communications we send as a result of a product or service purchases or other non-marketing related transactions between us.
- **Newsletters.** If you subscribe to one of our newsletters and you later want to unsubscribe, you can click the unsubscribe link at the bottom of any newsletter we send to you. Alternatively, you can email us at [privacy@fourrosesbourbon.com](mailto:privacy@fourrosesbourbon.com).
- **Accessing, Updating and Deleting Your Information.** If you have an account with us, you may have the ability to access your information and make updates to or delete your data. If not, you can contact us as set forth in the [Contact Us](#) section below to request access to, correction of, or deletion of personal information that you have provided to us. We may not accommodate

a request to change information if we believe the change would violate any law or legal requirement or negatively affect the information's accuracy.

- **Cookies and Automatic Data Collection Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. Flash cookies are not managed by the same browser settings as are used for browser cookies. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on [Adobe's website](#). However, if you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. If you do not want Google Analytics to be used in your browser, Google Analytics provides an opt-out tool which can be found [here](#). In some cases, you may be able to set your browser or email program to not download web beacons.
- **Interest Based Advertising.** Please see [Interest-based advertising](#) above for information on how to opt-out of interest-based advertising.
- **California Residents.** If you are a California resident, you may have additional rights and choices regarding your personal information. Please see [Your California Privacy Rights](#) for more information.
- **Nevada Residents.** If you are a Nevada resident, please see our [Nevada Privacy](#) section below for more information our information practices.

## 11. Data security

The security of your personal information is very important to us. We use physical, electronic, and administrative safeguards designed to protect your personal information from loss, misuse and unauthorized access, use, alteration or disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to take care when providing information in public areas of our website like product reviews, which any website visitor can view.

## 12. Your California privacy rights

**This Privacy Notice for California Residents** applies solely to all visitors, users, and others who reside in the State of California (“consumer” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 and the California Privacy Rights Act of 2020 (collectively, the “CCPA”), and any terms defined in the CCPA have the same meaning when used in this notice.

This notice does not apply to employment-related information of California-based employees, job applicants, contractors, or similar individuals.

### A. Information we collect

The information we collect and have collected about California residents in the last 12 months is described in [What information we collect](#) above. That information corresponds with the following categories of personal information under the CCPA:

Category	Examples	Collected
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A. Identifiers.	Your name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Your name, signature, address, telephone number, passport number, driver's license or state identification card number, credit card number, debit card number, or any other payment-related information. Please note that credit card and debit card information is not retained by Four Roses Distillery LLC.  Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	If you sign up for a tour, we may collect your veteran or military status.	YES
D. Commercial information.	Records products or services purchased, obtained, or considered, or other purchasing or consuming histories, tendencies, or preferences.	YES
E. Biometric information.	We do not collect biometric information.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	We may collect geolocation information relating to the location of your device.	YES
H. Sensory data.	We do not collect sensory data.	NO
I. Professional or employment-related information.	If you participate in market research, we may request that you provide us with professional-related information.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20	We do not collect non-public education information.	NO



U.S.C. Section 1232g, 34 C.F.R. Part 99)).		
K. Inferences drawn from other personal information.	Inferences drawn from any of the above reflecting your preferences or characteristics.	YES
L. Sensitive personal information	Under Cal. Civ. Code § 1798.121(d), we do not infer characteristics about a consumer based on any sensitive personal information collected or processed as defined under Cal. Civ. Code § 1798.140(ae).	NO

In the last 12 months, we have collected personal information from the sources described in [How we collect your information](#) above.

B. Use of personal information

In the last 12 months, we have used your personal information for the business and commercial purposes described in [How we use your information](#) above.

C. Disclosing of personal information

The business and commercial purposes that we have disclosed your personal information in the last 12 months are described above in [Disclosure of your information](#). More specific information on that sharing is as follows:

- *Disclosing your personal information for business purposes.* We have disclosed the following categories of personal information with our service providers and public or government (including enforcement) authorities for our business purposes:
  - Category A: Identifiers.
  - Category B: California Customer Records personal information categories.
  - Category D: Commercial information.
  - Category F: Internet or other similar network activity.
  - Category G: Geolocation data.
  - Category K: Inferences drawn from other personal information.

As described above, examples of business purposes include performing transactions, registering accounts, managing our relationship with you, and monitoring for security threats and fraud.

- *Disclosing your personal information for commercial or other purposes:* We have shared the following categories of your personal information with business partners, co-sponsors, event organizers and other third parties in a manner that is likely to be considered to be a “**sale**” or “**sharing**” under the CCPA:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category K: Inferences drawn from other personal information.

As described above, this information may be disclosed for personalization, analytics, marketing, retargeting, and sales. We do not knowingly sell or share personal information of consumers who are less than 16 years of age.

D. Your right to know

You have the right to request that we disclose certain information to you about our collection, use, disclosure, and sale/sharing of your personal information over the past 12 months. Once we verify your request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling/sharing that personal information.
- The categories of third parties with whom we disclose that personal information.
- If we sold/shared or disclosed your personal information for a business purpose, two separate lists disclosing: sales/sharing, identifying the personal information categories that each category of recipient purchased; and disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

E. Your right to obtain a copy of your personal information

You have a right to obtain a copy of the specific pieces of personal information we collected about you (also called a data portability request). Once we verify your request, we will provide you a copy of your personal information that is responsive to your request.

F. Your right to delete your personal information

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we verify your request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

G. Your right to correct your personal information

If you think some of the personal information we have about you is incorrect, you have the right to request that we correct the personal information in compliance with applicable data protection law.

H. Your right to opt-out of sale/sharing of your information

We do not sell our email lists or other personal information we collect about you for money. However, we may share information with third parties in a way that is considered a “sale” under the CCPA. Where that is the case, we will comply with California “Do Not Sell/Share” requirements.

I. How to exercise your CCPA rights

To exercise your general right to know, your right to obtain a copy of your information, or your right to delete your information contact us by visiting our website [here](#), clicking on the respective link which will direct you to an interactive form to log your request.

Alternatively, you can telephone us at 1 (888) 914-9661 and enter the following PIN when prompted: 420282.

To exercise the right to opt-out of sale of your personal information, please use our cookie management tool by clicking the following link and follow the instructions to opt-out: [Do Not Sell/Share My Personal Information](#).

Please note that opting out of sales/sharing in the context of cookies will not stop us from advertising to you. We may still present contextual (not cross-contextual) or other advertisements to you that do not rely on “sales” or “sharing” to our advertising partners.

You may also opt out by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC) on the browsers and/or browser extensions that support such a signal.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back into personal information sales at any time by visiting the following link and following the instructions to opt-back in: [Opt-In to Sales/Sharing of My Personal Information](#)

Under Cal. Civ. Code § 1798.121(d), we do not infer characteristics about a consumer based on any sensitive personal information collected or processed as defined under Cal Civ. Code § 1798.140(ae).

J. How we verify requests and respond to requests

Before fulfilling your request, we take steps to verify you are who you say you are or that you have authority to act upon someone else’s behalf. Therefore, upon receipt of your request, we will request additional information that we need to verify you and, if you are submitting a request on behalf of someone else, to verify that you are permitted to act on that person’s behalf.

When we contact you to request verification information, please respond and provide the information that we have requested. Depending on the nature of the request you make, we may require you to verify your identity to either a reasonable degree of certainty or high degree of certainty. This may mean that we need to match two or three pieces of information that we hold about you with information that you provide to us. In some cases, we may require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request or that you are authorized to make the request on behalf of someone else.

In addition to providing the information we need to verify you or your authority, you must provide us with enough information so that we can understand, evaluate, and respond to your request. We cannot respond to your request or provide you with personal information if we cannot confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify your identity or authority to make the request and to locate relevant information. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and to understand, evaluate, and respond to your request.

We cannot delete personal information in those situations where our retention is required for our own internal business purposes or otherwise permitted by the CCPA (such as fraud prevention or legal compliance). In these situations, we will retain your information in accordance with our records retention program and securely delete it at the end of the retention period.

K. Who may submit requests?

Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may also make request on behalf of your minor child. To designate an authorized agent, you must provide the authorized agent with signed permission to make the request. If your authorized agent is a business entity, then the authorized agent must be registered with the California Secretary of State to conduct business in California. We may deny a request from an authorized agent that does not submit proof that it has been authorized to submit a request on your behalf. Further, before responding to a request from an authorized agent, we will still require you to (1) verify that you have provided the authorized agent permission to submit the request on your behalf; and (2) verify your identity directly with us.

L. How often you can submit requests?

You may make a CCPA consumer request twice within a 12-month period.

M. Response timing and format

We make every attempt to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. When you request a copy of your personal information, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity easily.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

N. Non-discrimination

We will not discriminate against you for exercising any of your CCPA rights. You have a right not to receive discriminatory treatment by us for exercising your privacy rights.

O. Other California privacy rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To request such information, call our toll-free number: 1-888- or write to us at Compliance, Four Roses Distillery LLC, 1224 Bonds Mill Road, Lawrenceburg, KY 40342. In making such a request, please reference "California Shine the Light Law" in your email subject line or in the body of your letter if you make such request by mail.

### **13. Nevada privacy**

Nevada residents have the right to opt out of the sale of certain "covered information" collected by operators of websites or online services. We currently do not sell covered information, as "sale" is defined by such law, and we do not have plans to sell this information.

### **14. Changes to our privacy policy**

We will post any changes we may make to our privacy policy on this page. If the changes materially alter how we use or treat your information we will notify you by email to the primary email address specified in your account (if you have an account with us) and/or through a notice on the website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible

for ensuring that we have an up-to-date email address for you and for periodically visiting our website and this page to check for any changes.

## **15. Contact us**

If you have any comments or questions about our privacy policy, please use our [Contact Us](#) page to reach out to us.

4851-4582-3166v7