

The Wine Group LLC, doing business as Franzia and Woodbridge, wants you to be familiar with how we collect, use, share and disclose personal information as defined under applicable privacy law (or PII), including any PII legally defined as sensitive personal information (SPII). This Privacy Policy describes our practices in connection with information that we collect (including information you provide) online or off, via our websites (the “Sites”) or any other interaction with TWG, including purchasing our products (together with use of the Sites, the “Services”). TWG is happy to bring you the best beverages in the business. For more information about TWG and our brands, please visit www.thewinegroup.com.

This Privacy Policy shall be read together with our [Terms of Service](#) and any terms and conditions applicable to your submission of information (including user generated content) to us, such as applicable terms of a social media website through which you submit such content. We may change this Privacy Policy from time to time. Any changes to this Privacy Policy will become effective as indicated in the “Last Updated” line. Your continued use of the Sites or Services following these changes means that you accept the revised Privacy Policy.

Look below for our notice for California residents and our Annex 1 describing our PII collection and disclosure practices.

“**PII**” is information that identifies you as an individual or relates to an identifiable individual. PII we may collect includes:

- Name
- Postal address (including billing and shipping addresses)
- Telephone number
- Email address
- Credit and debit card number and security code

- Account username and password
- Social media identifier
- Birth date
- Purchase history, gender, income

Collection of PII. We may collect personal information from you, online and offline. Offline, we may receive information from you through telephone, written correspondence, and in person, including at our wineries, tasting rooms, or events. Online, we may receive information through our Sites, affiliated websites, a brand page on social media websites or similar online activities, email, user generated content, and via mobile phone applications or SMS (text message) correspondence. Generally, such information will be collected directly from you, such as through a transaction, inquiry or your submission of a form, registration or communication to us. Information may also be gathered from service providers, such as marketing and fulfillment companies, opt-in lists, and referrals, and through your activities and interactions with us, including, without limitation, your online activity on our Sites and social media pages. We may combine data we collect from these types of sources. Any of your personal information or other information gathered by one of our brands may be shared with and used by any of our other brands in accordance with this Privacy Policy. To see a complete list of what we collect and how we use this data, please see Annex 1 below.

USE OF PII

We and our service providers may use PII:

- To respond to your inquiries, fulfill your requests, process ongoing memberships and/or fulfill your orders of our products.
- To send information to and communicate with you, including marketing communications that we believe may be of interest.

- To confirm you are of legal drinking age.
- To personalize your experience by presenting products and offers tailored to you by us, our partners, and service providers, and to facilitate social sharing functionality.
- To allow you to participate in sweepstakes, contests, surveys and similar promotions and to administer these activities. Some of these activities may have additional rules containing information about how we use and disclose your PII. Please read those rules carefully.
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, improving or modifying our Services, identifying usage trends, determining the effectiveness of promotional campaigns, and operating and expanding business activities, and similar purposes.

DISCLOSURE OF PII

Your PII may be disclosed:

- To our affiliates, as defined by applicable privacy law, for the purposes described in this Privacy Policy.
- To our service providers who provide services such as Site hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, credit card processing, auditing and other similar services. This includes sponsors and fulfillment vendors of sweepstakes, contests, surveys and similar promotions.
- When you share on social media, to your friends associated with your social media account and to the social media account provider. By connecting us to your social media account you authorize us to share information with your social media account provider and you understand that the use of the information we

share will be governed by the social media site's privacy policy. If you do not want your PII shared with other users or with your social media account provider, please do not connect your social media account with your Site account and do not participate in social sharing on the Sites.

- To third parties in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), as well as our advisors and vendors, including but not limited to financial, legal and technical external advisors.
- We (including any of our brands) may use your user-generated content you choose submit to us including by displaying it on our Sites and using it for our promotional purposes.
- We may also use and disclose your PII as we believe to be necessary or appropriate: (a) to comply with applicable law and respond to requests from public and government authorities; (b) to enforce our terms and conditions; and (c) to protect and/or defend our rights, privacy, safety or property, and/or that of our affiliates, you, or others.
- If you are a resident of any country other than the United States, we may transfer Personal Information that we collect about you outside of your country, including the United States, for the purposes set out in this Privacy Policy, and including for processing by third-party service providers in connection with those purposes. Our third-party service providers may perform processing activities outside of your country of residence.

ONLINE ACTIVITY INFORMATION

“Online Activity Information” means the following which may include PII:

- Device Identifiers
- Cookies
- Beacons
- Pixel tags
- Mobile ad identifiers and similar technology
- Other forms of persistent or probabilistic identifiers
- Internet Protocol address
- Browsing and search history
- Other information regarding your interaction with Sites, applications or advertisements

COLLECTION AND USE OF ONLINE ACTIVITY INFORMATION

We and our service providers may collect and use Online Activity Information:

- **Through Your Browser Or Device:** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Sites you are using. We use this information to help ensure that the Sites function properly.
- **Using Cookies:** Cookies are pieces of information stored directly on the device that you are using. Cookies allow us to collect information such as browser type, time spent on the Sites, pages visited, language preferences, and other anonymous traffic data. We and our service providers use the information for security purposes, to facilitate navigation, display information more effectively, and to personalize your experience while using the Sites, as well as for online tracking purposes. We can

recognize your computer to enhance your use of the Sites. We also gather statistical information about the usage of the Sites in order to periodically improve the design and functionality, understand how the Sites are used and to assist us with resolving questions regarding the Sites. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Sites. We may also use cookies in online advertising to track responses to our advertisements and we may use cookies or other files to track your use of other Sites. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. However, if you do not accept these cookies, you may experience some inconvenience in your use of the Sites. For example, we may not be able to recognize your computer and you may need to log in every time you visit the Sites. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

- **Analytics.** We may use analytics services, which rely on cookies and similar technologies to collect and analyze information about use of the Sites and Services, and report on activities and trends. These services may also collect information regarding the use of other Sites, apps and online resources.
- **Using Pixels, Tags And Other Similar Technologies.** Pixels(also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Sites (including email recipients), measure the

success of our marketing campaigns and compile statistics about usage of the Sites and response rates.

- **Using Adobe Flash Technology (Including Flash Local Shared Objects (“Flash LSOs”)) And Other Similar**

Technologies: We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Sites. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the [Site Storage Settings Panel](#). You can also control Flash LSOs by going to the [Global Storage Settings Panel](#) and following the instructions (which may include instructions that explain, for example, how to delete existing Flash LSOs (referred to “information” on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without your being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with the Sites or our online content.

- **IP Address:** Your “**IP Address**” is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP Address may be identified and logged automatically in our server log files whenever a user accesses the Sites, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice and is done automatically by many websites, applications and other services. We collect and use IP Addresses for purposes such as calculating usage levels of the

Sites, helping diagnose server problems, and administering the Sites.

ADVERTISING AND ANALYTICS DISCLAIMERS

We and/or our service providers, including advertising companies, social networking websites, and service providers acting on our behalf, use cookies, pixels, web beacons, and other similar technology to collect information for the purposes described in this Privacy Policy including advertising, analytics, online behavioral marketing, monitoring performance, and improvement of our online services (traffic, errors, page load time, popular pages, etc.).

We do not conduct behavior remarketing.

GOOGLE ANALYTICS AND FACEBOOK PIXEL

We use Google Analytics and Facebook Pixel to understand how our website, services, and products perform, how you use them, and to serve you with ads on third-party websites and social networking websites like Facebook. To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy>. To opt out of Google Analytics please visit <https://tools.google.com/dlpage/gaoptout>. To learn more about how Facebook uses your data, please visit <https://www.facebook.com/policy.php>.

DIGITAL ADVERTISING ALLIANCE

You can also opt out from companies like Google, Instagram, Pinterest, Facebook and other participating companies through the Digital Advertising Alliance in the USA: <http://www.aboutads.info/choices>. You can also opt out of participating companies from the Digital Advertising Alliance of

Canada in Canada: <http://youradchoices.ca/> or opt out using your mobile device settings at <http://www.aboutads.info> choices.

RETENTION OF PERSONAL INFORMATION

We will retain your personal information (collected through offline and online methods) for no longer than necessary for the purposes described in this Privacy Policy. We will retain and use your personal information to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our legal agreements and policies.

AGGREGATE INFORMATION

We may aggregate PII and use the aggregated information to analyze the effectiveness of our Service, to improve and add features to our Service, and for other similar purposes. In addition, from time to time, we may analyze the general behavior and characteristics of users of our Service and share aggregated information like general user statistics with prospective service providers. We may collect aggregated information through the Services, through cookies, and through other means described in this Privacy Policy.

Once we have aggregated or de-identified PII, we will not reidentify, or attempt to reidentify, that information. Additionally, we will require all service providers who handle that aggregated or de-identified information to not reidentify, or attempt to reidentify, that information.

ADVERTISERS

We may use advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other Sites, based on information relating to your access to and use of the Services and other Sites. To do so,

these companies may place or recognize a unique cookie on your browser (including through use of pixel tags). If you would like more information about this practice and to learn about your choices in connection with these practices, please visit http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info>.

THIRD PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site, social media platform or service to which the Services link. Please review any third-party privacy policies to learn how they handle your PII. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

SECURITY

We use reasonable organizational, technical and administrative measures designed to protect PII within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the “Contacting Us” section below.

CHOICES AND ACCESS

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out of receiving these marketing-related emails by using the opt-out mechanism contained in each such email.

If you would like to update PII that you have provided to us, you may contact us in accordance with the “Contacting Us” section below.

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of twenty-one (21). We do not knowingly collect PII from individuals under 21, and we request that individuals under 21 do not use or access the Services and that they do not provide PII through the Services.

JURISDICTIONAL ISSUES

The Services are controlled and operated by us from California, United States, and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of California, United States. If you are a resident of any country other than the United States, we may transfer Personal Information that we collect about you outside of your country, including the United States, for the purposes set out in this Privacy Policy, and including for processing by third-party service providers in connection with those purposes. Our third-party service providers may perform processing activities outside of your country of residence.

CONTACTING US

If you have any questions about this Privacy Policy, please contact us at privacy@thewinegroup.com

CALIFORNIA CONSUMER PRIVACY ACT (CCPA) PRIVACY NOTICE

Last Updated: June 17, 2025

The Wine Group has prepared this California Consumer Privacy Act (“**CCPA**”) Privacy Notice (the “**Notice**”) to inform California residents of the Personally Identifiable Information (“PII”) that we collect and how we use and disclose that information, and the privacy rights California residents may have relating to their PII and how those rights can be exercised.

This Notice is incorporated into and forms part of our [Privacy Policy](#). By accessing or using the Sites or our Services, you agree to the practices described in this Notice. If you do not agree to this Notice, please do not access the Sites or otherwise use the Services.

PII COLLECTION AND DISCLOSURE.

The following tables below are intended to provide additional information about our collection and disclosure of PII which we may have collected from you since January 1, 2022. Nothing in this Notice limits our ability to use or disclose information as described in our Privacy Policy.

CUSTOMERS AND SITE VISITORS		
Category	Sources	Purpose
<p>Personal Information</p> <p><u>Examples:</u> full name, postal address, email address, phone number, account name, signature, age, social media handle.</p>	<p>Directly from you when you interact with the Sites or Services</p> <p>From social media platforms</p>	<ul style="list-style-type: none"> ● To respond to your inquiries, fulfill your requests, and/or fulfill your orders of our products. ● To send information to and communicate with you, including marketing communications.

	and similar services.	<ul style="list-style-type: none">● To confirm you are of legal drinking age.● To personalize your experience by presenting products and offers tailored to you.● To allow you to participate in sweepstakes, contests, surveys and similar promotions and to administer these activities. Some of these activities may have additional rules containing information about how we use and disclose your PII. Please read those rules carefully.● For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, improving or modifying our Services, identifying usage trends, determining the effectiveness of promotional campaigns, and operating and expanding business activities, and similar purposes.
--	-----------------------	---

--	--	--

<p>Sensitive Information</p> <p><u>Examples:</u> Social Security number (for sweepstakes and contest winners), credit card</p>	<p>Directly from you.</p>	<p>To provide 1099 tax form for prizes over or process your purchases.</p>

<p>information for purchases, financial information, demographic information.</p>		
<p>Online Activity Information</p> <p><u>Examples:</u> device identifiers, cookies, pixel tags, Internet Protocol address, browsing and search history.</p>	<p>From you directly or via cookies and similar technologies.</p> <p>From service providers and advertising networks collecting such information.</p>	<p>For our business purposes, such as marketing, data analysis, audits, fraud monitoring and prevention, developing new products, improving or modifying our Services, identifying usage trends, determining the effectiveness of promotional campaigns, and operating and expanding business activities, and similar purposes. For more information of how we use online activity information see our privacy policy above.</p>
<p>Commercial Information</p> <p><u>Examples:</u> records of products purchased, obtained, or considered, and other purchasing histories or tendencies.</p>	<ul style="list-style-type: none"> ● Directly from you. ● Direct sales and customer service providers. 	<ul style="list-style-type: none"> ● To respond to your inquiries, fulfill your requests, and complete your purchases. ● To send marketing communications that we believe may be of interest. ● To personalize your experience on the Services by presenting products and offers tailored to you.

		<ul style="list-style-type: none"> • For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, improving or modifying our Services, identifying usage trends, determining the effectiveness of promotional campaigns, and operating and expanding business activities, and similar purposes.
--	--	---

JOB APPLICANTS		
Category	Sources	Purpose
Identification Information <u>Examples:</u> name, postal address, email address, phone number.	<ul style="list-style-type: none"> • Directly from you. • From companies or organizations that we collect personal data to support pre-employment activities 	To consider and respond to your employment application
Demographic Information	Directly from you.	<ul style="list-style-type: none"> • To consider and respond to your

<p><u>Examples:</u> race, age, gender, disability, citizenship status, and military and veteran status.</p>		<p>employment application.</p> <ul style="list-style-type: none"> ● For compliance with legal obligations.
<p>Professional or Employment-Related Information</p> <p><u>Examples:</u> employment history, qualifications, certifications, references, and any other information you include in your resume or application.</p>	<p>Directly from you.</p>	<p>To consider and respond to your employment application.</p>
<p>Education Information</p> <p><u>Examples:</u> school(s) attended, degree(s) earned, GPA, activities, and any other</p>	<p>Directly from you.</p>	<p>To consider and respond to your employment application.</p>

information you include in your resume.		
---	--	--

BUSINESS TO BUSINESS INFORMATION		
Category	Sources	Purpose
<p>Business-to-Business (“B2B”) Information</p> <p><u>Examples:</u> Name, phone number, address, email address and other contact and relationship information consistent with your role in facilitating the business relationship.</p>	<p>You, if you are a contact person for any of our business partners, vendors, distributors, suppliers, service providers, contractors, or other entities with which we have a business relationship or potential business relationship.</p>	<p>For internal purposes, including to contact you, send and receive information, and otherwise facilitate business relationships.</p>

PII COLLECTED FROM CUSTOMERS AND SITE VISITORS

Additionally, we may disclose each of the above categories of PII for Customers, Site Visitors and Applicants for Employment:

- To third parties in the event of a merger, acquisition, sale or other business combination or divestiture.
- To service providers, such as attorneys, accountants, etc. in order for them to provide services on our behalf.

- To third parties and government entities, including law enforcement, as necessary for our compliance with our legal obligations or to protect our rights or the health and safety of our employees or the public.

YOUR RIGHTS UNDER THE CCPA

Where provided for by law and subject to any applicable exceptions and exclusions, California residents may have the following rights:

THE RIGHT TO KNOW

- What categories and specific pieces of PII we have collected about you;
- The categories of sources from which PII are collected;
- Our business or commercial purpose for collecting, using, or disclosing PII;
- The categories of third parties with whom we share PII; and
- The categories of PII we have sold or disclosed for a business purpose.
- You have a right to request, no more than twice in a 12-month period, that we disclose to you the specific PII we have collected about you since January 1, 2022.

Information Sold or Shared. We have not sold or shared, as defined by the CPPA, any personal information to third parties for a business or commercial purpose since January 1, 2022.

You also have a right to know if we have sold or disclosed your personal information for a business purpose since January 1, 2022 and, if so, the categories of personal information sold or disclosed and the categories of third parties to whom the personal information was sold or disclosed, along with the business or commercial purpose for which the personal information was sold or disclosed.

To make a request for any of the information set forth above (a “Request to Know”), please submit a request pursuant to the instructions below. You may only make a Request to Know twice within a 12-month period. We will acknowledge your Request to Know within 10 days and will attempt to respond substantively within 45 – 90 days.

You or your designated authorized agent can make a Request to Know the personal information we have about you by filling out our online form available [here](#) or emailing us at privacy@thewinegroup.com.

RIGHT TO KNOW ABOUT SENSITIVE PII COLLECTED

We collect and use your sensitive personal information as described in Annex 1 below.

We do not collect or process sensitive personal information for the purpose of inferring characteristics. Sensitive information is defined by the CCPA as information that reveals any of the following: your social security, driver’s license, state identification card, or passport number, your account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, your precise geolocation; your racial or ethnic origin, religious or philosophical beliefs, or union membership, the contents of your mail, email, and text messages unless the business is the intended recipient of the communication, and your genetic data, biometric information for the purpose of uniquely identifying you, information collected and analyzed concerning your health, and information collected and analyzed concerning your sex life or sexual orientation.

RIGHT TO REQUEST DELETION OF PII

You or your designated authorized agent have the right to request deletion of your personal information collected or maintained by us (“Request to Delete”), subject to certain exceptions permitted by law.

To make a Request to Delete, please submit a request pursuant to the instructions below. We will acknowledge your Request to Know within 10 days and will attempt to respond substantively within 45 – 90 days.

As permitted by law, if the information requested to be deleted is necessary for us to maintain, we will not be able to comply with your request. We will notify you if this is the case.

You or your designated authorized agent can make a Request to Delete the personal information we have about you by filling out our online form available [here](#) or emailing us at privacy@thewinegroup.com.

We will retain correspondence, documents and information related to any Request to Know, Request to Delete, or Request to Opt Out for 24 months as required by law.

THIRD-PARTY POLICIES

This Privacy Policy does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies, which are covered by such third parties’ privacy policies. For more information, we encourage you to check the privacy policies of these third parties to learn about their privacy practices.

Cookies. As explained in our “Collection and Use Of Online Activity Information” section, you can opt out of cookies using your browser. Please note:

- Opt-outs are device- and browser-based. You must opt out on each device and each browser where you want your choice to apply.
- Opt-outs may be stored via cookies. If you clear cookies, your opt-out may no longer be valid and you must opt out again where you want your choices to apply.
- We may still share your personal information with our service providers that help us perform functions that are necessary for our business such as vendors that host our website, credit card processors and analytics processors. These entities are contractually obligated to keep this information confidential and not use it for any purpose other than for the services they provide to our business.
- You may still receive ads from us that are not tailored to your interests.

In addition to the above options to opt out of the sale or sharing of your information under the CCPA as described above, you have controls and choices with respect to collection and use of your information by third parties. These are summarized for you below. We do not control or maintain opt-out mechanisms for third-party companies and are not responsible for their operation.

Advertising Opt Out. You can opt out of sharing your information with third-party companies engaged in targeted advertising including social networking websites such as Google and Facebook using the following tools:

For websites: <http://optout.aboutads.info/?c=2&lang=EN>.

For mobile apps: <http://www.aboutads.info/appchoices>.

Google Opt Out. If you would like to opt out of Google Analytics and Ads, you can. If you are on the web, you can opt out of Google

Analytics by installing Google's Opt Out browser add on <https://tools.google.com/dlpage/gaopto>.

Facebook Ad Preferences. To understand more about Facebook advertising and manage your preferences, please visit <https://www.facebook.com/about/ads>. Login to Facebook and go to Settings > Ads > Ad Settings (web) or Ad Preferences > Ad Settings (app) for more information.

RIGHT TO CORRECT

You have the right to request that we correct any inaccurate information about you. To make a request to correct inaccurate information about you (a "Request to Correct"), please submit a request pursuant to the instructions below. We will acknowledge your request within 10 days and attempt to respond substantively within 45 – 90 days.

We will review all information provided by you to determine whether the information in our records is inaccurate. We reserve the right to delete the information instead of correcting if such deletion does not impact you or your consent to the deletion. We will inform you of our decision to deny or grant your request.

You or your designated authorized agent can make a Request to Correct the personal information we have about you by filling out our online form available [here](#) or emailing us at privacy@thewinegroup.com.

We will retain correspondence, documents, and information related to any Request to Correct for 24 months as required by law.

Right To Access Information About Automated Decision Making And The Right To Opt-Out Of Automated Decision Making

We do not use automated decision making processes.

Business-to-Business Information. If you are a contact person for any of our business partners, vendors, distributors, suppliers, service providers, contractors, or other entities with which we have a business relationship or potential business relationship, we collect the contact information you provide to us, including name, phone number, address, email address and other contact and relationship information consistent with your role in facilitating that business relationship. We use that information for internal purposes, including to contact you, send and receive information, and otherwise facilitate the business relationship. We do not disclose that information outside our business relationship without your consent.

CALIFORNIA SHINE THE LIGHT DISCLOSURE INFORMATION

Although we do not disclose to any third parties for their marketing purposes any of your personal information, California residents are entitled to receive the following disclosure. If you are a resident of California:

Under California Law, California residents have the right to request in writing from businesses with which they have an established business relationship: (1) a list of the categories of personal information, such as name, address, e-mail address, and the type of services provided to the customer, that a business has disclosed to third parties (including as defined by California Civil Code Section 1798.83 our affiliates that are separate legal entities) during the immediately preceding calendar year for the third-parties' direct marketing purposes, and (2) the names and addresses of all such third parties. We will respond to such written requests within 30 days following receipt at the e-mail or mailing address specified below under

“Contact Us”. If we receive your request at a different e-mail or mailing address, we will respond within a reasonable period of time, but not to exceed 150 days from the date received. Please note that we are required to respond to each customer only once per calendar year.

Non-Discrimination. If you choose to exercise any of the rights detailed in this Notice, we will not discriminate against you in any way as a result of that exercise, including by offering you different pricing or products or by providing you with a different level of quality of products.

Notice of Financial Incentive. We may offer programs, benefits, sweepstakes or other offerings related to the collection or retention of personal information which may be deemed a “financial incentive” under the CCPA. Consumers who elect to participate in financial incentive programs (such as reward programs, limited-time promotions, sweepstakes, or contests) may be asked to provide personal information such as your name, email address, physical address, and or phone number. We may also collect commercial information such as credit card numbers and payment information (in limited circumstances), details of transactions that you carry out through our services, including products purchased or considered, and wine club information from consumers who elect to participate in a rewards program. The details of each program or offering are described in the applicable terms and conditions.

Under the CCPA, the incentives we offer in exchange for the opportunity to market to you may be considered financial incentives. The value of the information you provide as part of a program will vary based on the program in which you participate and the number of consumers who chose to participate. We have made the determination that the CCPA-permitted financial incentive we offer is reasonably related to the value of your personal information, and we

provide written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time but you may lose access to the relevant incentive. If you wish to opt-out, you may do so by sending your request to privacy@thewinegroup.com.

HOW CAN A CONSUMER WITH A DISABILITY ACCESS THIS NOTICE?

Consumers who have a visual disability may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this Notice.

HOW TO SUBMIT A REQUEST.

To submit a request, [click here](#) or email us at privacy@thewinegroup.com.

VERIFYING REQUESTS

All requests must provide sufficient information to allow us to verify that you are the person about whom the personal information was collected, sold or disclosed and must contain sufficient detail to allow us to properly understand, evaluate and respond to your request. You may be asked to provide additional proof of identification so that we can verify your identity and validate the request. If we cannot verify your identity, we may decline to honor your request.

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your PII or complying with your request. If you have an account with us, we may verify your identity by requiring you to sign into your account. If you do not have an account with us, or if we suspect fraudulent or malicious activity, we may require you to provide additional PII for verification

and, in certain circumstances, sign a declaration under penalty of perjury that you are the consumer whose PII is the subject of the request. If we cannot verify your identity, we will not provide or delete your PII.

AUTHORIZED AGENTS

You may submit a request through an authorized agent using the same methods available to you. If you designate an authorized agent to make an access, deletion or opt-out of sale request on your behalf (1) we may require you to provide the authorized agent signed permission to do so, and (2) for access and deletion requests, we may require you to verify your own identity directly with us (as described above), and confirm that you have provided the agent permission to submit the request.

ADDITIONAL INFORMATION

Employees and contractors are provided notice via different statements.

CONTACTING US

If you have questions or concerns regarding this California Privacy Notice or the practices described, please email us at privacy@thewinegroup.com.