

## PRIVACY POLICY

Welcome to the Suntory Liquors Limited ("we", "our", or "us") Privacy Policy for our AO Vodka brand website (the "Website") and other related software, interactive features or downloads operated by us and that are available through the Website (whether accessed directly or through any software Website) (collectively, the "Service" or "Services").

We take privacy very seriously and are committed to being transparent with you about how we use your information. Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

If you have any questions about this Privacy Policy, please contact us at: [info@ao-vodka.com](mailto:info@ao-vodka.com).

### Information we collect

We collect information to provide better services to our users and improve our business. We may collect information about the Services that you use and how you use them, like when you visit different parts of our Website or applications and what selections you make on the Services. We may also collect and store your personal information (such as your name, address, telephone number, email address or any other information by which you may be identified) if you email us (or the companies designated by us to attend in each region) through the "Contact" page.

We may also automatically collect certain technical information such as:

- o **Device information.** We may collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile information if you use a mobile device to access the Service).
- o **Log information.** When you use our Services or view content provided by us, we may automatically collect and store certain information in server logs. This information may include:
  - details of how you used our Services, such as your navigation paths and search queries;
  - mobile related information if you access our Services using your mobile device;
  - internet protocol address;
  - device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL;
  - cookies that may uniquely identify your browser, mobile device, or your account;
  - browser type, operating system, and other technical information

### How we use information we collect

We use the information we collect from all of our Services to provide, maintain, protect and improve our Services, to develop new services and offerings and to protect our us and our users. When you contact us, we may keep a record of your communication as well as the other information in this Privacy Policy to help solve any issues you might be facing. We may use your email address to inform you about our Services, such as letting you know about upcoming changes or improvements.

We do not track its customers over time and across third party websites to provide targeted advertising and therefore we do not respond to Do Not Track (DNT) signals.

Please keep in mind that comments sections, forums, and other similar areas of our Services are public. Any information posted in those areas is viewable and usable by anyone that has access.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

### **Choice**

If we provide you with any mailings or other communication, you can always opt out of that communication.

You may also set your browser to block all cookies, including cookies associated with our Services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our Services may not function properly if your cookies are disabled.

You have the right to remove your personal information from our databases.

### **Accessing and updating your personal information**

Whenever you use our Services, we aim to provide you with access to your personal information in your account. If that information is wrong, we strive to give you ways to update it quickly or to delete it unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

### **Information we share**

We do not share personal information with companies, outside organizations and individuals unless one of the following circumstances applies:

- **With your consent**  
We will share personal information with companies, outside organizations or individuals if we have your consent to do so.
- **For external processing**  
We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.
- **For legal reasons**

We will share personal information with companies, outside organizations or individuals if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable law, regulation, legal process or enforceable governmental request, detect, prevent, or otherwise address fraud, security or technical issues or protect against harm to the rights, property or safety of our users or the public as required or permitted by law.

- **In case of a sale or asset transfer**

If we become involved in a merger, acquisition or other transaction involving the sale of some or all of our assets, user information, including personal information collected from you through your use of our Services, could be included in the transferred assets. Should such an event occur, we will use reasonable means to notify you, either through email and/or a prominent notice on the Services.

- **In aggregated form for business purposes**

We may share aggregated, non-personally identifiable information publicly and with our partners such as business with have a relationship with, advertisers or connected sites. For example, we may share information to show trends about the general use of our Services.

### **Information security**

We work hard to protect our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. However, no website is entirely secure. You should protect the account information in your possession as well.

### **Third-Party Sites**

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you on our Services. We also do not control the privacy policies and your privacy settings on third-party sites, including social networks.

### **Enforcement**

We regularly review our compliance with our Privacy Policy. When we receive formal written complaints, we will contact the person who made the complaint to follow up.

### **Children Under 13**

Our Service is not directed toward children under 13 and we will not knowingly collect information for any child under the age of 13. If you are the parent of a child under the age of 13 and have a concern regarding your child's information on our Services, please contact us at [info@ao-vodka.com](mailto:info@ao-vodka.com).

### **Our Services are Located in the United States**

Our Services are hosted in the United States. If you are outside of the United States, your information will be processed and stored in the United States and you are consenting to such processing and storage.

### **California Residents**

Under California Civil Code section 1798.83, California residents have the right to request and receive from us, once a year, free of charge, information about the personal information we have disclosed (if any) to third parties for their marketing purposes during the previous calendar

year, and a description of the categories of personal information shared. To make such a request, please contact us at [info@ao-vodka.com](mailto:info@ao-vodka.com) including the phrase "California Privacy Request" in the subject line, and provide us with your name, postal address and email address.

### **Changes**

Our Privacy Policy may change from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes).

This Privacy Policy was last updated on March 28th, 2014