



## **ORTIZ CIGARS, INC.**

### **Privacy Policy**

Your privacy is important to us. It is Ortiz Cigars, Inc. policy to respect your privacy regarding any information we may collect from you through our website, ortizcigars.com (the “Website”). The purpose of this Privacy Policy is to let you know what type of information we collect through the Website and how it will be used.

Your continued use of the Website will be regarded as acceptance of our privacy practices. If you have any questions about how we handle data collected through the Website, feel free to contact us using the contact information below. This policy is effective as of December 1, 2020.

#### **1. Terms**

By accessing the Website, you are agreeing to be bound by this Privacy Policy. If you do not agree with any of these terms, you are prohibited from using or accessing this Website. The information collected through your use of the Website may be transferred to and maintained on computers located outside of your state, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. If you are located outside United States, please note that your information collected through the Website may be processed in and outside of the United States. Your use of the Website indicates your agreement to that transfer.

#### **2. Information Collection, Use, and Do Not Track Signals**

We collect information through the Website including: your IP address, web browser type and version, unique device and user id, referring website address, details on your visit to the Website such as date, time, and duration, clicks, and cookies. “Cookies” are data files sent to your browser and stored on your device, which are used to track your usage of the Website.

The above information is used for analytics, personalization, security, and improvement of the Website. We do track your use of the Website through such information. While your web browser may permit you to elect to not be tracked, unless otherwise legally required, we are not required to respond to such Do Not Track signals.

We may also share the information collected through the Website with our third party service providers who assist us with making the Website available online. We may also share such your

information to the extent that we are required by applicable law, regulation, legal process, or other lawful request. In the event of a merger or acquisition, we may also disclose your information collected through the Website with such relevant third parties.

### **3. Security**

We store and protect data collected through the Website using commercially acceptable means to prevent loss and theft. However, we do not guarantee that this Website is secure.

### **4. Children**

This Website is aimed at and intended only for adults. We do not knowingly collect or use any personally-identifying information including that of children. Please contact us if you believe that we have acquired information through the Website which personally identifies any minor, so that we can immediately address the issue.

### **5. California Privacy Rights**

This section is specific and applies only to web visitors who are California residents, under the meaning of Section 17014 of Title 18 of the Cal. Code of Regulations. Under the California Consumer Privacy Act of 2018 (“CCPA”), up to twice in a twelve (12) month period, a consumer has the right to request that a business disclose what personal information it collects, uses, discloses, and sells. Information regarding our collection, disclosure, and sale practices are detailed below, in addition to instructions on how to exercise your rights regarding your personal information.

What Personal Information Do We Collect?

We collect, and have collected personal information about our visitors in the preceding 12 months in the following categories:

<b>Categories of Personal Information</b>	<b>Types of Personal Information Collected</b>
Identifiers, or information that identifies, relates to, describes, or is capable of being associated with, a particular individual	Email address; Internet Protocol address
Internet or other electronic network activity information	Time and date of your visit to the Site; Time spent on the Site; Referring and exit web pages; Specific webpages you visited, including any third party sites reached through the Site; Internet service provider; Domain name servers; Types of computers or devices accessing the Site;

Geolocation information	Web browser type and version; Behavioral data (opens, clicks) Geographic region based on IP address; Area code and zip code associated with your web server
Inferences drawn from any of the above information to create a profile about a consumer reflecting the consumer's preferences, characteristics, behavior, etc.	Inferences about an individual's propensity to respond to a particular email advertisement

The above personal information is required to provide you with the ability to access and interact with the Website. We collect the above personal information directly from you via the Website, including from cookies, tags, web beacons, and tracking pixels on the Website. We use and store cookies on your computer to facilitate and customize your use of our Website. A cookie is a small data text file, which is stored on your computer's hard drive (if your web browser permits) that can later be retrieved to identify you to us. Cookies make your use of the Website easier, make the Website run more smoothly, and help us to maintain a secure Website. The cookies may collect information about you, such as the referring website address, your IP address, your browser type and version, your Internet service provider, the area code and zip code associated with your server, the time and date of your visit, and the time spent on the Website.

The above personal information is required to provide email advertising services to you, and to allow you to access and interact with email advertisements. The above personal information is used to track consumer interaction with our email advertisements (counting ad impressions, verifying positioning, and verifying quality of ad impressions). We collect the above personal information directly from you when you open and/or click on the email advertisements which we send you, as well as if you request to unsubscribe from receiving future email advertisements from us.

We also collect the above personal information through advertising networks, data analytics providers, operating systems and platforms, and consumer data resellers/brokers.

The collection of personal information in the categories of "identifiers, or information that identifies, relates to, describes, or is capable of being associated with, a particular individual", "Internet or other electronic network activity information", "geolocation data", and "commercial information" are required to: 1) provide you with the ability to access and interact with the Website; 2) for the purposes of tracking consumer interaction with the Website and with our email advertisements (counting ad impressions, verifying positioning and quality of ad impressions); 3) advertising/marketing services, including affiliate marketing; and 4) analytics and internal research.

The collection of personal information in the category of "inferences drawn from any of the above information to create a profile about a consumer reflecting the consumer's preferences, characteristics, behavior, etc." is required for: 1) advertising/marketing services, including affiliate marketing; and 2) analytics and internal research.

What Personal Information Do We Disclose?

If you elect to unsubscribe from receiving future email advertisements from us, we disclose your email address to our third party advertisers through a suppression file, to comply with CAN-SPAM. To the extent legally required to comply with applicable laws and regulations, or to respond to a lawful request, or to otherwise protect our rights, we may also disclose any of the above personal information. As we continue to develop our business, we might sell or buy assets. In such transactions, personal information collected through the Website may be one of the transferred business assets. Also, in the event that we, or substantially all of our assets, are acquired, such personal information will be included within the transferred assets.

### What Personal Information Do We Sell?

Under the definitions of “Sell” and “Sale” in the CCPA, we do not sell your personal information, nor do we sell the personal information of minors under 16 years of age, without affirmative authorization. There are no financial incentives to disclose.

### Your Right to Request to Know and How to Submit a Verified Request to Know

A “request to know” is request related to the personal information that a business has about such consumer. It may include a request for any or all of the following from us:

1. specific pieces of personal information that we have about you;
2. categories of personal information we have collected about you;
3. categories of sources from which the personal information was collected;
4. categories of personal information that we have sold or disclosed for a business purpose about you;
5. categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
6. the business or commercial purpose for collecting or selling the personal information.

The CCPA permits requests to know from the same consumer up to twice in a twelve (12) month period.

To submit a request to know, please, email your request to [Johnny@ortizcigars.com](mailto:Johnny@ortizcigars.com). To process your request, you may be required to submit your name and email address in conjunction with your request. The name and email address which you provide will be used to verify your request and to attempt to identify you within our data records. If you elect to use an authorized agent to exercise your right to submit a request for information, proof of your consent to utilize such authorized agent as well as verification of your own identity may be required before processing the request. The information which you submit in conjunction with your request to know will be used for the express purposes of verification and providing you with responsive information to your request, if required.

### **Your Right to Request Deletion and How to Submit a Verified Request to Delete**

You have the right to request the deletion of any personal information which we have collected about you, or which we maintain. To submit a verifiable request to delete, please email your request to [Johnny@ortizcigars.com](mailto:Johnny@ortizcigars.com). To process your request, you may be required to submit your name and email address in conjunction with your request. The name and email address which you provide will be used to verify your request and to attempt to identify you within our data records. If you elect to use an authorized agent to exercise your right to submit a request for deletion, proof of your consent to utilize such authorized agent as well as verification of your own identity may be required before processing the request. The information which you submit in conjunction with your request to delete will be used for the express purposes of verification and fulfilling your request, if required.

A two-step process must be utilized for online requests to delete, whereby you clearly submit your request to delete, and second, you separately confirm that you want your personal information deleted.

To the extent that your personal information is necessary for us to maintain for a reason delineated in Cal. Civ. Code § 1798.105(d), including but not limited to complete a transaction for which the personal information was collected, provide a good or service you have requested, detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, debug, etc., or to comply with a legal obligation, we are not required to comply with your request for deletion. For instance, we are not required to delete personal information which is necessary to maintain suppression files for those individuals who have opted out of receiving email marketing from us. If we are unable to verify your request, we will notify you as well.

### **Your Right to Non-Discrimination for the Exercise of Your Privacy Rights**

California affords consumers with the right not to receive discriminatory treatment by a business for the exercise of their privacy rights conferred by the CCPA. This means that you cannot be denied goods or services; be charged different prices or rates; be provided with a different level or quality of goods or services; or have it suggested that you will receive a different price or rate or different level or quality of goods or services.

Notwithstanding the above, a business can charge a consumer a different rate or price, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to the consumer by the consumer's data. Further, notwithstanding the above, a business may offer financial incentives for the collection of personal information, the sale of personal information, or the deletion of personal information, and may also offer a different price, rate, level, or quality of goods or services to the consumer if that different is directly related to the value provided to the consumer by the consumer's data.

## **6. Modifications**

We may revise this Privacy Policy at any time and without notice to you. We will update the above date in the event of any such revision. By using this Website, you are agreeing to be bound by the then current version of the Privacy Policy.

## **7. Contact Us**

You may contact us by email at: [Johnny@ortizcigars.com](mailto:Johnny@ortizcigars.com), or by mail at: Ortiz Cigars, Inc. 2 West Street, Suite #2, Haverstraw, NY 10927, United States, for any reason, including to request details on the type and categories of information which we have collected about you through your visit(s) to the Website; request deletion of your information; and/or questions or concerns regarding this Privacy Policy or our Website. Further, if you have a disability which interferes with your ability to access this Privacy Policy, we can make accommodations to present the Privacy Policy in an alternative format, to assist you. If you would like to receive this information in another format that is accessible to your needs (for example: audio, large print, etc.) please contact us.

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