

PRIVACY POLICY

This privacy policy (the "Privacy Policy") sets forth a commitment and description of practices related to personal data privacy and security of Grapexchange LLC, a California limited liability company, and its successors, parents, subsidiaries, affiliates and related companies or other companies under a common control that we may have now or in the future operate ("Grapexchange," "we," "our," or "us"). The singular term "Website" includes all websites and all devices or applications that collect personal information from you that we may have now or in the future operate that link to this Privacy Policy, web pages within each such website, device or application, any equivalent, mirror, replacement, substitute, or backup website, device, or application and web pages that are associated with each such website, device, or application. By accessing the Website and providing us with personal information, you agree to be bound by this Privacy Policy.

In addition to this Privacy Policy, we have established Terms and Conditions that set forth the general rules and policies governing your use of the Website. A copy of the Terms and Conditions can be found at www.wineroutes.com/terms

Grapexchange is committed to protecting your personal data. We provide this Privacy Policy to explain the type of information we collect on the Website and how that information is used.

All matters relating to the Website are governed by the laws of the State of California, in the United States. Please note that any information you provide will be transferred to the United States, and by using the Website or providing us your personal information, you authorize this transfer.

COLLECTED INFORMATION

Registration Information

When you register with the Website, you can elect to provide us with contact information, such as your name, physical and electronic address, phone number, and other similar contact details to receive information and updates on our products and services, as well as those of our subsidiaries, affiliates, and parent companies and any of their related businesses as well as those of our third-party partners. Such information will not be used for marketing and promotion of such products and services unless you request to receive such information. We use return email addresses to answer the email that we receive, and we may use return email to send you other information. Such addresses are not used for any other purpose.

IP Addresses

In addition to information that you provide us voluntarily, Grapexchange may collect aggregate information in the form of IP addresses. An IP address is a number that is automatically assigned to your computer whenever you are surfing the Web. Web servers, the computers that "serve up" web pages, automatically identify your computer by its IP address. When you request a page from the Website, our servers automatically log your IP address and certain other information, such as browser type, internet service provider (ISP), referring/exit pages, operating system, data/time stamp, and clickstream data. We do not link this automatically-collected data to any data that is personally identifiable to you. Although your Website session may be logged, the automatically-collected data will not reveal to us any personally identifiable information about you.

Cookies and Other Tracking Devices

Cookies and other user tracking devices may be stored in your computer's hard drive when you visit the Website. A cookie is a piece of data stored on a site visitor's hard drive to help improve access to the site

and better identify repeat visitors. These tracking devices may also be used to help us speed up your future activities or to improve your experience by remembering the information that you have already provided to us. We do not use these devices to retrieve information from your computer that was not voluntarily provided by you. Some of our business partners may also use these devices to provide us with anonymous data and information regarding the use of the Website. At your option, you may block or delete tracking devices from your hard drive. However, by disabling such tracking devices, you may not have access to the entire set of features of the Website.

HOW WE USE AND SHARE THE INFORMATION COLLECTED

We may use information collected from you in the following ways:

- We may use information for internal user activity and marketing analysis, for example, to assess trends amongst our consumers or to measure the amount of traffic to the Website. We may also share non-personal information with others, such as advertisers, in aggregate, anonymous form, which means that the information will not contain any personally identifiable information about you.
- We may use your personal information in order to communicate with you about our products and services and those of our subsidiaries, affiliates, and parent companies and any of their related businesses and those of our third party partners.
- We may arrange for selected organizations to send you marketing and promotional information that may be of interest to you if you have elected to receive such information. In such circumstances, your personal information may be disclosed to these organizations who will agree to be bound by the terms of this privacy statement.
- Information that you post on or through any public areas of the Website is generally accessible to, and may be collected and used by, others and may result in unsolicited messages or other contact from others.
- In the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, we may transfer, sell, or assign to third parties information concerning your relationship with us, including, without limitation, personally identifiable information that you provide and other information concerning your relationship with us.
- We may transfer your personal information to third parties under confidentiality obligations for the performance of services provided to us or in connection with the administration and support of the activities noted above (e.g., the administration of a marketing campaign).
- We may disclose your personal information if permitted by law or required to do so by law or where we believe such action is necessary in order to protect or defend our interests or the interests of our customers or users of the Website.

Our policies and procedures limit access to personal information to those with a business reason to know such information. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. However, due to the open communication nature of the Internet, we cannot represent, warrant, or guarantee that communications between you and us, or personal information stored on our servers, will be free from unauthorized access by third parties, loss, misuse, or alterations. **GRAPEXCHANGE DISCLAIMS ANY AND ALL LIABILITY FOR UNAUTHORIZED ACCESS OR USE, OR COMPROMISE OF YOUR PERSONAL INFORMATION SUBMITTED THROUGH THE WEBSITE. USERS ARE HEREBY ADVISED THAT THEY SUBMIT SUCH PERSONAL INFORMATION AT THEIR OWN RISK.**

THIRD-PARTY SITES

The Website may contain links or references to other websites outside of our control. Please be aware that this Privacy Policy does not apply to these sites. Additionally, the Website may include functionality that allows integration with third-party sites, such as Twitter, Facebook, or other social networks. We may allow you to share information, rich media, and other content, including your information, with such third-party sites, and you may be permitted to export information concerning your use of the Website to such third-party sites. Some of those third-party services may provide us with your information to enhance and personalize your use of the Website. If you submit your credentials (e.g., username and password) for a third-party website or service during your registration for the Website or in connection with updating your user profile, we may receive your information from such third-party website or service. Grapexchange encourages you to read the privacy statements and terms and conditions of linked or referenced sites you enter. These third-party websites may send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data or solicit personal information. **GRAPEXCHANGE DOES NOT CONTROL AND IS NOT RESPONSIBLE FOR WHAT THIRD PARTIES DO IN CONNECTION WITH THEIR WEBSITES, OR HOW THEY HANDLE YOUR PERSONAL INFORMATION. PLEASE EXERCISE CAUTION AND CONSULT THE PRIVACY POLICIES POSTED ON EACH THIRD-PARTY WEBSITE FOR FURTHER INFORMATION.**

PRIVACY RIGHTS

You may request that we provide you the information we hold about you, update your information, or ask us to remove your information, or to correct any inaccuracies in such personal data by sending an email to support@wineroutes.com. We will use reasonable efforts to deal with your request within a reasonable time.

We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by email or by means of a notice on our home page.

We reserve the right to disclose your personal information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order or legal process served on our Web site.

CONTACT INFORMATION

Should you have any questions or concerns about this Privacy Policy or the collection of information, please email us at support@wineroutes.com

Effective Date. These Terms are effective as of: February 1st, 2017.