

Privacy and Cookie Policy

Effective Date: July 1, 2014

At Prestige Wine & Spirits Group, we are very sensitive to the privacy concerns of visitors to all of our websites, including our pages and applications on third-party social-networking services such as Facebook, Twitter, Pinterest or Instagram and our applications on mobile devices. We know that maintaining your trust requires that we protect your privacy. This Privacy Policy explains our online information practices at this website and the choices that you, as a visitor to this website, can make about the collection and use of your information.

Legal age to purchase alcoholic beverages

You must not provide us with your personal information if you are not of legal age to purchase alcohol in the jurisdiction in which you reside and (if different) in the jurisdiction in which you are accessing the Site. We do not intend to collect personal information from any individuals under the legal purchase age or market alcoholic beverages to anyone under the legal purchase age. If we receive notice or believe that someone under the legal purchase age has provided us with personal information we will make every reasonable effort to remove such personal information from our files or flag such personal information and retain it for the sole purpose of ensuring that it is not used any further.

Personal information we may ask you for and how we might use it

When you visit our website, we collect personal information from you (such as your name, address, phone number, e-mail address, etc.) when you voluntarily provide it to us. Depending on the purpose for which the information was provided, we may use the information to communicate with you regarding our products, services, and promotions, to provide you with other information or materials that you request, to customize your interactive experience, and/or to improve our product and service offerings.

Here are the circumstances in which we might ask for personal information from our consumers through our website, the types of information we obtain, and how we might use the information:

- If you contact one of our Consumer Services Representatives through our website, we may ask you for personal information such as your name, address, phone number, or e-mail address so that we can respond to your questions or comments. (Of course, if you send us an e-mail, we will at a minimum obtain your e-mail address.)
- You may be asked to provide personal information if you:

- register as a user of our website or to post content to our website;
 - agree to receive an online newsletter or other information or material from us;
 - register for a sweepstakes, contest or other promotion;
 - register to receive coupons through our website;
 - participate in a survey, a consumer research panel, similar type of activity; or
 - otherwise participate in features of our website that ask for personal information.
- If you purchase or otherwise request a product, publication or promotional offering from us or take advantage of a rebate or similar offer, you may be required to provide your contact and/or payment information (such as a credit card number) in order for us to process your request.

Your participation in any of these activities (and therefore your provision of personally identifiable information) is entirely voluntary. We may use the information you provide to respond to your questions or comments, to administer our promotions and websites, to fulfill your request, subscription, or order, to provide you with a customized interactive experience or to otherwise provide or improve our products and services. Based on the information you provide, we also may obtain additional information about you, such as U.S. Postal Service address change data or demographic information, from commercially available sources.

We will not send you any online newsletter or similar e-mail marketing communication unless you expressly consent to receive such a communication from us. And if you do choose to receive any such e-mail communication from us, you will always have the opportunity to “unsubscribe” from receiving the e-mail at any time.

How do we use cookies, web beacons or similar technologies?

We may employ cookie technology, web beacons, transparent GIF images, and similar devices to facilitate website administration and navigation, to better understand and improve the effectiveness of our site, and to provide an enhanced online experience for our visitors. Information tracked through these mechanisms includes but is not limited to (1) a user’s domain name and IP address (e.g.,192.168.1.1), (2) the type of web browser (e.g., Internet Explorer) and operating system (e.g., Windows) being used, (3) the pages of the website a user visits and (4) other websites a user visited before visiting our website. These devices may also be used on our behalf by third parties managing our advertising on other websites to enable us to learn which advertisements bring visitors to our websites and to otherwise improve our online advertising.

Most browsers accept cookies automatically, but can be configured not to do so or to notify the user when a cookie is being sent. If you wish to disable cookies, refer to your browser help

menu to learn how to disable cookies. Please note that if you disable cookies, you may be unable to access some customized features on our website.

Devices like web beacons and transparent GIF images are tiny or transparent graphics that allow us to count the number of users who have visited a particular web page or to how they navigate our site. We may use these graphics on our websites to count users and to recognize users by accessing our cookies. Being able to access our cookies allows us to personalize our website and improve your experience at our website. We may also include these graphics in HTML-formatted e-mail messages that we send to determine which e-mail messages were opened.

Cookies and similar technologies used for online behavioral advertising, and your right to opt out

Third parties that are involved in serving other companies' advertising on our websites, or that are involved in determining which advertisements you might see on third-party websites, may use cookies to collect information (such as the advertisements you have seen or the websites or pages you have visited) in order to draw inferences about what internet advertising content might be relevant to you. These cookies may be used by these third parties while you are visiting our website, and these third parties may then use the information gathered through these cookies to show you advertising they believe to be most relevant to you when you visit other websites not belonging to us. This practice is called "online behavioral advertising." You have the ability to opt out of allowing these third parties to use cookies to gather information from your computer for online behavioral advertising by clicking here:

<http://preferences.truste.com/truste/>.

If you opt out, these companies have committed to refrain from using cookies (or similar technologies) in this manner to gather information on any website (not just ours) for online behavioral advertising purposes. Please be aware that the opt-out process is itself cookie-based. In other words, when you opt out, a cookie is placed on your browser that informs these third parties that they are not to use cookies with you for online behavioral advertising. As a result, if you subsequently clear cookies from your browser (as many people do periodically), your opt out will be lost until you reinstate it. Also, please be aware that your opt out does not mean you will not continue to receive advertising – you just will not receive advertising that might otherwise have been targeted to you based on these cookies on your computer.

When we might provide other parties with your personal information

If you give us your explicit consent to do so, we may share your personal information with other marketers at unaffiliated companies. If you do not affirmatively consent to this, we will not share your information with other such marketers.

We may provide your personal information to third parties who provide services on our behalf. These parties may use the information solely in conjunction with the specific services they provide for us (e.g., fulfillment of an order, responding to your question or comment, providing a sweepstakes prize, deployment of a consumer survey, investigation of a complaint, etc.)

Some of these third parties may be involved in administering or supplementing our databases and will need to have access to the information in order to do so. For example, we may retain a third party to verify the accuracy of information within our databases or to gather additional information about individuals within our databases from commercially available sources.

We reserve the right to transfer any information we have about you in the event that we sell or transfer all or a portion of our business or assets to a third party. We also reserve the right to share information within Prestige Wine & Spirits Group amongst our various businesses.

We reserve the right to disclose any personal information as needed if such information is requested by law enforcement agencies or if we are required to do so by law, regulation, subpoena, court order or by a government entity. We also may disclose personal information to third parties if we have reason to believe that disclosing such information is necessary to conduct investigations of possible breaches of law or legal rights, to cooperate in any legal investigation, or to identify, contact, or bring legal action against someone who may be violating the terms of use of our website or any other terms applicable to any activity or feature of our website.

Personal information we may receive from third-party social-networking services or banner ads

If you choose to access or make use of third-party social-networking services (such as Facebook, Twitter, Pinterest or Instagram), we may receive personal information about you that you have made available to those services, including information about your contacts on those services. For example, some social-networking services allow you to push content from our website to your contacts or to pull information about your contacts so you can connect with them on our website. Some social-networking services also will facilitate your registration for our website or enhance or personalize your experience on our website. Your decision to use a social-networking service will always be voluntary. However, you should make sure you are comfortable with the information your third-party social-networking services may make available to our website by visiting those services' privacy policies. Any personal information we receive through third-party social-networking services may be used as described above.

Links to other sites

Our website may contain links to the websites of our subsidiaries and affiliates, and to websites that are owned and operated by third parties. These other websites may have their own privacy

policies and are not governed by this Privacy Policy. We are not responsible for the privacy practices or the content of websites owned and operated by any such third parties. Other websites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy for each website you visit.

User-generated content and public profile features

This website may, from time to time, contain interactive areas where website users might submit comments or other content (including information about the user that might be displayed in the user's public profile within an online community) that may be posted on the website or otherwise published. Users who do this should be aware that when they voluntarily disclose personally identifiable information (e.g., name, e-mail address, etc.) in content submitted for posting or publication, the information can be read and used by others. This may result in unsolicited messages from other posters or parties. We make no representations and undertake no obligations as to the security or use of information you voluntarily include when submitting content.

Send-to-a-friend tools

This website may, from time to time, include a send-to-a-friend application that makes it easy for you to forward information or materials from our website to friends or family by e-mail. In order to address your e-mail message, the application may ask you to input the recipient's e-mail address and/or similar information (including your e-mail address). This information is only used by the application to address your message so that it can be properly sent. Prestige Wine & Spirits Group does not retain any of this information for any purpose.

Children's privacy

This website is not directed to children. We recommend that parents monitor their children's Internet activities and learn and employ software or other tools which can help their children enjoy the fun and entertainment of an on-line experience without compromising their personal safety or allowing them to use the Internet in a manner inconsistent with their parents' preferences.

United States only

This website is intended for use by residents of the United States of America only. All matters relating to this website are governed by the laws of the United States. If you are located outside of the United States and you contact us, please be advised that any information you provide to us will be transferred to the United States and that by submitting information you explicitly authorize this transfer and the processing of this information within the United States.

Changes in our online privacy policy

We reserve the right to change or replace this Privacy Policy at our sole discretion at any time. Please check back from time to time to ensure that you are aware of any updates or changes in this Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all information gathered via this website.

Your consent to the terms of this privacy policy

By using this website, you signify your assent to all of the terms of this Privacy Policy and this website's Terms of Use. If you do not agree with any term of this Privacy Policy or our Terms of Use, please do not use this website or submit any personally identifiable information.

Your control over your information

You always have the right to review and update the information that you previously provided to us at this website. You may contact us as described immediately below in order to arrange this or to ask us to remove you from our list of e-mail addresses to which we send e-mail newsletters. All of our e-mail newsletters also contain an "unsubscribe" link that you can click through to unsubscribe from future e-mails.

How to contact us

If you have any questions or concerns about this Privacy Policy or about our collection or use of information, please contact us. Prestige Wine & Spirits Group, 1999 Shepard Road, St. Paul, MN 55116; Attention Legal Dept; 651-649-5800.