

## **PRIVACY POLICY**

Your privacy is very important to us. Accordingly, we have developed this policy in order for you to understand how we collect, use, communicate and disclose and make use of personal information. The following outlines our privacy policy.

- Before or at the time of collecting personal information, we will identify the purposes for which information is being collected;
- We will collect and use personal information solely with the objective of fulfilling those purposes specified by us and for other compatible purposes, unless we obtain the consent of the individual concerned or as required by law;
- We will only retain personal information as long as necessary for the fulfillment of those purposes;
- We will collect personal information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual concerned;
- Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up-to-date;
- We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification;
- We will make readily available to customers information about our policies and practices relating to the management of personal information, and;
- We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.

### **MAKING A PURCHASE**

When you buy something on [Commongroundmencare.com](http://Commongroundmencare.com), you have to supply a billing address, phone number, shipping address, and payment information. By making a purchase, you become a registered user of [Commongroundmencare.com](http://Commongroundmencare.com). You can choose to store information needed to make a purchase, such as your credit card number, shipping and billing addresses in the My Account - Profile page. If you change your mind about storing this information, you can amend or delete it by going to the relevant area of the My Account - Profile page and following the instructions. You can access this section using your registration password.

### **CHILDREN UNDER 13**

We comply with the Children's Online Privacy Protection Act of 1998. If you are under the age of 13, you can look at our Sites, but you cannot make a purchase. You also cannot become a registered user, or use any service on our Sites that asks for personal information. Our Sites are not designed for children. We do not wish to collect personal information from children under 13. This policy is designed to protect children. Federal law requires us to take special steps to safeguard children's privacy. For more information about this federal law and about children's privacy, [click here](#). If you register with us and

we discover that you are under 13, we will delete your registration. We will send you a message if we do this. If you are under 13 and want to make a purchase, please ask a parent or legal guardian to place the order for you.

### **SOCIAL COMMERCE AND OTHER THIRD PARTIES**

We work with trusted third parties, including social network sites like Facebook, and with application developers who specialize in social commerce so we can connect to your social networks. Other social networks include Twitter. All of these companies operate Third Party Sites. We provide access to our Sites by third parties and business partners so we can generate interest in our products among members of your social networks and to allow you to share product interests with friends in your network.

The use of any features made available to you on our Sites by a third party may result in information being collected or shared about you by us or by the third party. Information collected or shared through any such third party features is considered "public information" by us because the Third Party Sites made it publicly available. If you do not want us to be able to access information about you from Third Party Sites, you must instruct Third Party Sites not to share the information. We cannot control how your data is collected, stored, used or shared by Third Party Sites or to whom it is disclosed. Please be sure to review the privacy policies and privacy settings on your social networking sites to make sure you understand the information they are sharing. If you do not want a Third Party Site to share information about you, you must contact that site and determine whether it gives you the opportunity to opt out of sharing such information. Julep is not responsible for how these third parties may use information collected from or about you. However, we do identify any areas on our Sites where third parties share information about you.

### **TRACKING ANONYMOUS SITE BEHAVIOR**

We use technology that tracks anonymous (non personally-identifiable) traffic data on Commongroundmencafe.com. This technology uses 1st party (Commongroundmencafe.com) "cookies" that collect anonymous information about how the site is used by our customers. We do this in order to improve both the experience on Julep.com and how we serve our customers in general. These cookies do NOT collect, store, or transmit any personally-identifying information. For example, your email address, billing information, or IP address are NOT collected by these cookies.

We also use Display Advertising and Remarketing through Google Analytics on our website. Google and other third-party vendors show our ads on sites across the internet based on first-party and third-party cookies.