



We are committed to keeping your personal information private. This Privacy Policy applies to information we collect through the website, web pages, interactive features, applications, widgets, blogs and their respective contents at the following URL(s): www.tudorice.com; and their respective contents, whether accessed via computer, mobile device or other technology (collectively, the “Sites”). Please take a moment to read this Privacy Policy carefully before using the Sites. By using the Sites, you are acknowledging that you understand and agree to this Privacy Policy.

The Sites are offered by Tudor Ice Company. This Privacy Policy explains how we may collect your information, how we may use your information or share it with others, and how you may access and control your information in connection with our marketing communications and activities.

1. INFORMATION WE COLLECT

Information You Provide To Us

So that you can fully benefit from the Sites, we may ask you to provide certain information about yourself. We may ask you to provide information that could be used to contact you or to identify you personally (such as your name, email address, telephone number, home address or other related information (“Personal Information”), such as for example, we may collect Personal Information when you open a TUDOR ICE COMPANY account, request information from us, submit comments, post on social media sites, participate in a promotion, survey or other feature of the services offered by TUDOR ICE COMPANY (the “Services”), or otherwise use the Sites. We may also ask you to provide other information about yourself, such as demographic information (gender, zip code, age or certain information about your preferences, interests, friends and contacts). We may also ask you to provide certain financial information (for example, credit or debit card number, expiration date, and card verification number) in order to process payments for any fees collected by us or by third party merchants in relation to programs or components of the Services that may require payment for use. Finally, the Sites may make available certain interactive services like bulletin boards, chat rooms, blogs and forums (collectively, “Interactive Services”). Please remember that any information that you disclose through these Interactive Services becomes public information and is not subject to the provisions of this Privacy Policy. If you do not want some or all of your Personal Information collected, please do not submit it.

Information We Collect Automatically

Whenever you interact with the Sites, we and third-party service providers may use a variety of technologies that automatically or passively collect information about how you access and use the Sites (“Usage Information”). Usage Information may include, in part, your browser or device type, your operating system, the page served, the time, the preceding page views, and your use of features or applications on the Sites. This statistical data provides us with information about the use of the Sites, such as how many visitors visit a specific page, how long they stay

on that page, and which hyperlinks, if any, they “click” on. This information helps us keep the Sites fresh and interesting to our visitors and tailor content to a visitor’s interests.

Technologies used on the Sites to collect Usage Information may include, but are not limited to:

Cookies

Cookies are data files placed on a device when it is used to access the Sites. Either we or our third-party service providers may place cookies or similar files on your device for security purposes, to facilitate site navigation and to personalize your experience while visiting the Sites. Cookies allow us to collect technical and navigational information, such as your browser type, time you spend on the Sites and the pages you visit. Cookies allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Sites. If you would prefer not to accept cookies, you can change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; or set your browser to automatically not accept any cookies. However, please be aware that some features of the Sites may not work properly because we may not be able to recognize and associate you with your TUDOR ICE COMPANY HOLDINGS account (if applicable). In addition, the advertisements and offers we provide when you visit us may not be as relevant to you or tailored to your interests.

Pixel Tags

A pixel tag is a transparent graphic image, sometimes called a clear GIF, web beacon or tracking beacon, placed on a web page or in an email, which indicates that a page or email has been viewed. In addition, a pixel tag may tell your browser to get content from another server.

We also automatically collect your IP address or other unique identifier (“**Device Identifier**”) for the computer, mobile device, technology or other device you use to access the Sites. A Device Identifier is a number that is automatically assigned to your device when you access a web site or its servers, and our computers identify your device (including its location) by its Device Identifier.

2. HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect about and from you for a variety of business purposes, including, for example, to respond to your questions and requests; provide you with access to certain areas and features of the Sites; communicate with you about your account and activities using the Sites and changes to any of our policies; tailor content, advertisements, and offers we serve you; improve the Services; to process applications and transactions, and for our internal business purposes. In addition, we may use your Personal Information for other purposes for which you otherwise provide your consent.

3. SHARING OF INFORMATION

Except as provided in this Privacy Policy, we will not provide any of your Personal Information to any third party without your specific consent. We may share non-Personal Information, such as aggregate user statistics,

demographic information, and Usage Information, with third parties. We may also share your information as disclosed at the time you provide your information, and as otherwise described in this Privacy Policy. In addition, we may share your information in the following circumstances:

Third Parties Providing Services on Our Behalf

In order to carry out your requests, to make various features, services and materials available to you through the Sites, and to respond to your inquiries, we may share your Personal Information with third parties that perform functions on our behalf (or on behalf of our affiliates). These may include, for example, companies or individuals that host or operate the Sites, analyze data or provide customer service, and payment providers. We may also use your Personal Information or share it with our subsidiaries, affiliates, or other third parties to provide you with Service information and promotional and other offers.

Your Agreement to Have Your Personal Information Shared

While using the Sites, you may have the opportunity to opt-in to receive information and/or marketing offers or to otherwise consent to the sharing of your information with a third party, including social networking sites such as Instagram, Facebook, Pinterest or Twitter. If you request products, services, or other information that may be offered by us as part of the Services, your Personal Information and the Personal Information you disclose will be subject to the privacy policy and business practices of that third party.

Business Transfers

We may share your Personal Information with other entities and affiliates in the family of companies controlled by TUDOR ICE COMPANY for business and operational purposes. As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all or substantially all of our assets, or assets related to the Services and/or the Sites, Personal Information, Usage Information, and any other information that we have collected about the users of the Sites may be disclosed to such entity as part of the due diligence process and will be transferred, in whole or in part, to such entity as one of the transferred assets. If so, we will seek to obligate the acquiring entity to use any information transferred in a manner consistent with this Privacy Policy, but cannot guarantee that it will be able to impose that requirement or that the acquiring company will comply. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered one of our assets and as such may be sold or transferred to third parties.

Legal Disclosure

In addition, we may transfer and disclose information, including your Personal Information, Usage Information and Device Identifier (including IP address), to third parties to comply with our legal obligations; when we believe that the law requires it; at the request of governmental authorities conducting an investigation; or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to the Sites or the public.

4. INFORMATION WE RECEIVE FROM THIRD PARTIES

We may receive information about you from third parties. For example, if you're on another website and you opt-in to receive information from us that website may send us your email address and other information so we can contact you as requested. If you choose to participate in a third party application or feature (such as one of our Facebook or Twitter applications or a similar application or feature on a third party website), you allow us to collect (or the third party to share) information about you, including Personal Information such as lists of your friends, "likes", comments you have shared, groups and location. We may also receive information about you if other users of a third party website give us access to their profiles and you are one of their "connections" or information about you is otherwise accessible through your "connections" web page, profile page, or similar page on a social networking or other third party website or interactive service. The information we collect about you through the Sites may be supplemented with information from third parties in order to enhance the Services and your experience of it and to confirm the information that users provide to us. In those cases, we will apply this Privacy Policy to any Personal Information provided, unless we have disclosed otherwise.

5. YOUR CHOICE AND ACCESS

In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted to us. We are under no obligation to store your Personal Information indefinitely, and we disclaim any liability arising out of, or related to, the destruction of your Personal Information. Please note that it is not always possible to completely remove or delete all of your information from our databases without retaining some residual data because of backups and other reasons. Finally, please be aware that we do not control certain privacy settings and preferences maintained by our social media partners like Facebook and Twitter. If you wish to make changes to those settings and preferences, you may do so by visiting the settings page of the appropriate social media site.

6. REFERRAL PROGRAMS

We may allow you to refer friends to the Services via email and social networking platforms. If you refer a friend by email, we will collect the name and email addresses of proposed recipients to send the email on your behalf. We may also use your name and email address in order to identify you as the initiator of the email. Please inform your friends that we may send those emails on your behalf.

If you refer a friend via social networking platforms, you will be subject to the privacy policy and the terms and conditions of the specific social networking platform. Some social networking platforms enable functionality that allows a user to receive and transmit data to the social networking platform through use of overlays or other technology. Although it appears the data is collected by us, the data is in fact collected directly by the social networking platform. If you decide to use this functionality, the data to be transmitted will be collected directly by the social networking platform, and we do not receive, collect or use the information. Please note your social networking account settings, as those settings will affect how and with whom your posts, information and other content are shared.

7. SECURITY OF YOUR INFORMATION

We take information security seriously, and we use reasonable security measures to help protect against the loss, misuse or alteration of your Personal Information. Please note, however, that we cannot ensure the security of any

information you transmit to us or that we store. You use the Services and provide us with your information at your own risk.

8. CHILDREN

Because protecting the privacy of children is especially important, the Services and the Sites are not directed to children under 21. We do not knowingly collect, use or disclose personally identifiable information from anyone under 21 years of age. If you are under 21 years of age, please do not use or access the Sites at any time in any manner. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 21, we will make reasonable efforts to delete such information from our records.

9. EXTERNAL SITES

The Sites may contain links to external third-party sites that we do not own or operate. This may include links from partners that may use our logo(s) as part of a co-branding or co-marketing agreement and sites selling our goods and/or services. We do not control, recommend or endorse and are not responsible for these third-party sites or their content, products, services or privacy policies or practices. These other sites may send their own cookies to your device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site which appears or claims that it is one of our services (including those linked to through an email or social networking page).

10. CONSENT TO PROCESSING AND TRANSFER OF INFORMATION

We operate the Sites in the United States and process and store all information on secure servers in the United States. Our use of your information necessarily involves the transmission of data on an international basis. If you are located in the European Union, Canada or elsewhere outside of the United States, please be aware that information we collect may be transferred to and processed in the United States. By using the Services, or providing us with any information, you consent to the collection, processing, maintenance and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen.

11. CHANGES TO THIS PRIVACY POLICY

We may change, add or delete information on the Sites and/or this Privacy Policy, at any time without prior notice to you. We will notify you of any material changes by posting the updated Privacy Policy on the Sites or by otherwise communicating to you. Any changes will be effective immediately upon the posting of the revised Privacy Policy, and we encourage you to check back regularly for any changes, additions or deletions.

12. CONTACTING US

Please contact us if you have any questions or concerns about this Privacy Policy or your experience with the Services: info@tudorice.com or (786) 423-3752.