

PRIVACY POLICY

LAST UPDATED

12 October 2017

OVERVIEW

Thank you for visiting www.ezicerinks.com (the "Site"), which is owned and operated by EZ ICE, Inc. As used herein, the terms "we", "us" and "our" refer to EZ ICE, Inc., and the term "Service" means the Site and all information, tools, functions, features and services available at the Site. This Privacy Policy governs your use of the Service.

EZ ICE, Inc. values the trust that you have placed in us. Our Privacy Policy is designed to ensure that you understand what information we gather about you, how we use and share it, and the safeguards we have in place in order to protect it when you visit our Site and use other aspects of the Service. If you have additional questions or would like further information on this topic, please feel free to contact us at contact@ezicerinks.com. We may update this Privacy Policy from time to time. Please visit this page periodically to review the most current Privacy Policy.

Capitalized terms used herein without definition will have the same meanings as defined in the Terms of Service applicable to the Service, which are available on our website.

SECTION 1 - WHAT INFORMATION DO WE COLLECT?

When you visit the Site or otherwise access the Service, web servers collect general information about your visit (such as, for example, traffic data like time, date and the address of the website from which you entered the Site), which is stored as anonymous, aggregate data. EZ ICE, Inc. also collects more specific information about you and your use of the Service (such as, for example, demographic data, profile data and frequency or duration of use). Collecting such data (collectively, "Traffic Data") may entail the use of software programs, web beacons, pixel tags, cookies, IP addresses or other numeric codes used to identify a computer.

Whenever you interact with the Service, a variety of technologies are employed to automatically or passively collect Service Data. The term "Service Data" means all data and

information that are provided by you in connection with the purchase of Products, posting User Generated Content and other uses of the Service, and all other data and information about you that are otherwise discerned or collected by EZ ICE, Inc. based on your access and use of the Service. For clarity, Service Data includes, but is not limited to: personally identifiable information (like name, address, telephone number and email address); browser or device type; operating system; time of day; identification of Site page views; use of particular Service features; and geographic location. At no time will the Service access, collect or store any of the personal contacts, photographs or other information stored on your device without your permission.

When you access or use the Service, EZ ICE may access, collect, monitor and/or remotely **store “location data,” which may include GPS coordinates (including but not limited to latitude and/or longitude), IP addresses, and/or similar information regarding the actual location of your device.** Location data may convey to us information about how you browse or use the Service. Location data does not collect or share any personally identifiable information about you. Location data may be used in conjunction with personally identifiable information. Some features of the Service, particularly any location-based services, may not function properly if use or availability of location data is impaired or disabled.

We do not collect or store your credit card information. The purchase of Products (including the entry, storage and verification of credit card information) is handled by our e-commerce vendor, as described in more detail below.

SECTION 2 – DO WE COLLECT INFORMATION FROM CHILDREN?

EZ ICE, Inc. will not collect personally identifiable information from any person who is actually known to us to be under the age of 13. If we become aware that a person under 13 has provided personally identifiable information, EZ ICE, Inc. will take steps to remove such **information and terminate that individual’s account,** access and use of the Service.

SECTION 3 - WHAT DO WE DO WITH YOUR INFORMATION?

Except as set forth below, at no time will any of your personal data be shared with any third party by EZ ICE, Inc. Your IP address is not linked to personally identifiable information, but is used to gather broad demographic data and to monitor statistics to improve the Service.

EZ ICE, Inc. uses Traffic Data to help diagnose problems with its web servers, to administer the Service and to analyze user trends and behaviors. EZ ICE, Inc. will share Traffic Data with certain third parties for the purposes of technical and customer support.

EZ ICE, Inc. collects, stores, processes and analyzes Service Data and produces Analytics. The term "Analytics" means user profiles and statistics, metrics, abstractions and other analyses that are based on or derived from the Service, Service Data and/or your use of the Service (including without limitation, measurements of Service usage and performance), which are developed in a manner that does not disclose your identity (such as, in the aggregate with other data, results and measurements) and that does not disclose any specific Service Data (unless in aggregated or de-identified form).

EZ ICE, Inc. will access, record, collect, copy, store, process, analyze and use your Service Data: to communicate with you (including sending emails about our store, new Products and other updates); provide the Service to you; to develop, improve, extend and test the Service (and underlying technology platforms); to design, develop and produce Analytics; and to disclose, distribute and transmit Service Data to our third party service providers, solely for the purpose of them providing to us services that are related to the Service. EZ ICE, Inc. will use Analytics to market and promote EZ ICE, Inc., our Products and the Service.

SECTION 4 – YOUR CONSENT

When you browse the Site or use other aspects of the Service (such as, for example, when you provide us with personal information to complete a transaction, verify your credit card, place an order, arrange for a delivery or return a Product), you are consenting to our processing of your information and communicating with you as set forth in this Privacy Policy.

By providing your phone number to us, you expressly consent to receive phone calls and/or text messages from us. We will not give your phone number to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

Any phone calls and/or text messages delivered to your phone or device may cause you to incur extra data, text messaging, or other charges from your wireless carrier. MESSAGE AND DATA RATES MAY APPLY. You are solely responsible for any carrier charges incurred as a result of phone and/or text communications from EZ ICE.

You may withdraw your consent for us to contact you, and to continue collecting, using and disclosing your personal information, at any time, by contacting us at contact@ezicerinks.com or mailing us at: EZ ICE, Inc., 745 Atlantic Avenue, Boston, MA 02111, USA.

SECTION 5 – DISCLOSURE AND SHARING OF SERVICE DATA

Currently, EZ ICE, Inc. will not share your personal information with any third party for purposes that are not related to providing the Service to you; provided, EZ ICE, Inc. may disclose your personal information (a) if reasonably necessary for EZ ICE, Inc. (or its third party service providers) to operate the Service, including processing your orders, queries and other messages, (b) to communicate with you, (c) as otherwise permitted under the Privacy Policy or elsewhere in the Terms of Service, (d) if EZ ICE, Inc. reasonably believes that such action is necessary to conform or comply with any legal, regulatory, law enforcement or similar requirement or investigation, to protect or defend the rights or property of EZ ICE, Inc. or any third party or to enforce the Terms of Service or (e) as otherwise authorized by you.

EZ ICE, Inc. does not rent or sell Service Data to outside marketers.

For clarity, we may share your Service Data with trusted service providers that need access to your information to provide operational or other support services for us. These providers must agree to comply with terms and conditions that are consistent with our privacy and data security policies.

We may also partner with third party organizations to provide special programs or offers to EZ ICE, Inc. customers, in which case we may disclose to that organization information we collect, such as your name and contact information. Any such partnerships will be communicated and/or disclosed prior to placing an order to purchase Products from us. If you elect not to participate in such special programs or offers, you reserve the right to deny such sharing of information.

SECTION 6 - E-COMMERCE VENDOR

Our store, which is located at the Site, is currently hosted by Squarespace. They provide us with the online e-commerce platform that allows us to sell our Products to you. Your data is stored through **Squarespace's** data storage, databases, and the general Squarespace application. They store your data on a secure server behind a firewall.

If you choose a direct payment gateway to complete your purchase, then Squarespace stores your credit card data. It is encrypted through the Payment Card Industry Data Security Standard (PCI-DSS). Your purchase transaction data is stored

only as long as is necessary to complete your purchase transaction. After that is complete, your purchase transaction information is deleted.

All direct payment gateways adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers. For more insight, you may also want to read **Squarespace's** Terms of Service (<https://www.shopify.com/legal/terms>) or Privacy Statement (<https://www.shopify.com/legal/privacy>).

SECTION 7 - THIRD-PARTY SERVICES

In general, the third-party providers used by us will only collect, use, and disclose your Service Data to the extent necessary to allow them to perform the services they provide to us. However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies regarding the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers. In particular, remember that certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us. If you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located. As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States laws and regulations, including the Patriot Act. Once you leave our Site or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our Terms of Service.

When you click on links on the Site, they may direct you away from our Site. We are not responsible for the privacy practices of other sites and encourage you to read their privacy statements.

SECTION 8 - SECURITY

Information collected by EZ ICE, Inc. is stored in operating environments that are secured using commercially available tools and procedures, and which are not made generally available to the public. Unfortunately, no data transmission over the Internet and/or wireless networks can be guaranteed to be 100% secure. As a result, EZ ICE, Inc. cannot unequivocally guarantee the security of any information you provide, and you do so at your own risk. Once EZ ICE, Inc. receives your information, we will make reasonable efforts to ensure its security on our systems.

If you provide credit card information, it will be encrypted using secure socket layer technology (SSL) and stored with an AES-256 encryption.

SECTION 9 - COOKIES

Here is a list of cookies that we use. We've listed them here so you that you can

choose if you want to opt-out of cookies or not. **_session_id**, unique token, sessional, Allows Shopify to store information about your session (referrer, landing page, etc). **_shopify_visit**, no data held, Persistent for 30 minutes from the last visit, **Used by our website provider's internal stats tracker to record the number of visits** **_shopify_uniq**, no data held, expires midnight (relative to the visitor) of the next day, Counts the number of visits to a store by a single customer. **cart**, unique token, persistent for 2 weeks, Stores information about the contents of your cart. **_secure_session_id**, unique token, sessional **storefront_digest**, unique token, indefinite If the shop has a password, this is used to determine if the current visitor has access.

[\(https://www.squarespace.com/cookie-policy/\)](https://www.squarespace.com/cookie-policy/) <-for reference

SECTION 10 – ANALYTICS

We use analytics services that use cookies, javascript and similar technologies to help us analyze how users use the Service. The information generated by these services about your use of the Service (including your IP address or a truncated version of your IP address) is transmitted to and stored by analytics service providers on their servers. Those service providers will use this information for the purpose of evaluating your, and other **users', use of the Service, compiling reports for us on website activity** and providing other services relating to website activity and Internet usage.

We may collect information about your computer, including your IP address, operating system and browser type, for system administration and in order to create reports. This is **statistical data about our users' browsing actions and patterns, and does not identify any individual.**

We use cookies on our site for Google Analytics. Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their website. Google Analytics customers can view a variety of reports about how visitors interact with their website so that they can improve it.

Like many services, Google Analytics uses first-party cookies to track visitor interactions as in our case, where they are used to collect information about how visitors use our site. We then use the information to compile reports and to help us improve our site.

Cookies contain information that is transferred to your computer's hard drive. These cookies are used to store information, such as the time that the current visit occurred, whether the visitor has been to the site before and what site referred the visitor to the web page.

Google Analytics collects information anonymously. It reports website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit <https://tools.google.com/dlpage/gaoptout>.

We also use Google conversion tracking and/or similar services to help us understand your **and other users' use of the Service.**

Please see <https://support.google.com/adwords/answer/1722022?hl=en> for more information about conversion tracking provided by Google.

SECTION 11 – DO NOT TRACK

Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities, over time and across different websites.

When you turn on the Do Not Track function in your browser, EZ ICE, Inc. stops collecting the information from your browser that allows us to tailor the Service specifically to you and to develop valuable Analytics. Do Not Track signals are set on a browser-by-browser basis, so you must set them on every browser you use if you do not wish to be tracked.

For clarity, this is just our Do Not Track policy. EZ ICE, Inc. cannot and does not make any promise about how third parties react when you set the Do Not Track signal on your browser. In addition, the Do Not Track signal does not apply to the use of information collected prior to such request.

SECTION 12 - CALIFORNIA RESIDENTS

Under California Civil Code Section 1798.83 (the "Shine the Light" law), California residents who provide personal information in obtaining products or services from EZ ICE, Inc. are entitled to request and obtain from us once a calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year (e.g., requests made in 2016 will receive information regarding 2015 sharing activities). If you are a California resident and would like a copy of this information, please submit a written request to:

EZ ICE, Inc.
745 Atlantic Avenue
Boston, MA 02111, USA

SECTION 13 - BUSINESS TRANSFERS

EZ ICE, Inc. may transfer Traffic Data, Service Data (including personally identifiable information) and Analytics to any successor to all or substantially all of its business or assets that concerns the Service. In the event of any such transfer, the successor will have all of the rights and be subject to all of the obligations of this Privacy Policy, including, without limitation, the right to modify or replace this Privacy Policy, as provided herein.

SECTION 14 - NON-US USERS

YOU EXPRESSLY CONSENT TO THE TRANSMISSION, COLLECTION, STORAGE, PROCESSING AND USE OF THE ANALYTICS AND YOUR SERVICE DATA (INCLUDING PERSONAL INFORMATION) IN ACCORDANCE WITH THIS PRIVACY POLICY. YOUR SERVICE DATA (INCLUDING PERSONAL INFORMATION) MAY BE COLLECTED, STORED, PROCESSED, USED AND TRANSMITTED WITHIN, FROM AND TO THE COUNTRY WHERE IT WAS COLLECTED AND THE UNITED STATES. UNITED STATES LAWS REGARDING THE USE OF PERSONAL INFORMATION MAY BE LESS STRINGENT THAN THE LAWS IN YOUR COUNTRY.

SECTION 15 - CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the Site. If we

make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

Information collected by the Service is subject to the Privacy Policy in effect at the time of use.

SECTION 16- UNSUBSCRIBE FROM EMAILS

All unsubscribe or opt-out requests may be made by emailing us at contact@ezicerinks.com. We will process your request within a reasonable time after receipt. However, we are not responsible for, and in some cases we are incapable of, removing your personally identifiable information from the lists of any third party who has previously been provided your information in accordance with this Privacy Policy or your consent. You should contact such third parties directly. If you would like to update or correct any personally identifiable information that you have provided to us, please email us at contact@ezicerinks.com and once we confirm your information, we will update such information within a reasonable amount of time.

SECTION 17 - QUESTIONS AND CONTACT INFORMATION

If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information contact our Privacy Compliance Officer at contact@ezicerinks.com or by mail at

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Boston, MA 02111, USA