



Website Privacy Policy

Introduction

Ventures Food & Beverage, LLC and its affiliates ("**Company**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the Website www.natures-twist.com (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to the information we collect:

- On this website.
- In email, text, and other electronic messages between you and this website.
- When you interact with our advertising and applications on third-party websites and services if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
- Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, please do not access, or use the website. By accessing or using this website, you agree to this privacy policy. This policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of this website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Children Under the Age of 13

Our website is not intended for children under 13 years of age. No one under the age of 13 may provide any personal information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this website or through any of its features, register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this website, or provide any information about yourself to us, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at customer_service@natures-twist.com.

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see [Your California Privacy Rights](#) for more information. We do not knowingly sell personal information about persons under the age of 16.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our website, including information:

- By which you may be personally identified, such as name, postal address including zip code, e-mail address, or telephone number, the information you provide to us in the free-form contact box on the Website, or other identifiers by which you may be contacted online or offline, for example, if you engage with us through a social media site, we may collect your social media user identifier ("**personal information**")
- Using technologies such as GPS or Wi-Fi, we may collect information about your location. For example, if you access or use our website on a mobile device, we may access your device's location information to provide you with location-enabled features or information.
- That is about you but individually does not identify you, such as your gender and age, household, or lifestyle information; and/or
- About your internet connection, the equipment you use to access our website (including mobile device identifiers, usage details, and related information including what site you came from, or what site you visit when you leave us. In addition, we may collect information about your use of our website, including using tracking technologies such as cookies, pixel tags, and Flash Cookies.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- When you sign up for our email newsletters and other notifications.
- When you participate in promotions such as sweepstakes or contests
- When you contact us, such as through our "Contact Us" page.
- From third parties, for example, our business partners. We may also receive information from commercial sources such as companies who compile information about shoppers and their preferences. Social media platforms may also give us information about you, and we may get information about your interactions with our ads on third-party sites.

Information You Provide to Us

The information we collect on or through our website may include:

- Information that you provide by filling in forms on our website. This includes information provided at the time of subscribing to receive email from us, contacting us through our "Contact Us" page, or requesting further services, products, or information. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our website.
- Records and copies of your correspondence (including email addresses) if you contact us.

- Your responses to surveys that we might ask you to complete for research purposes.
- Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our website, including traffic data, location data, logs, and other communication data, and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). To opt out of behavioral tracking, you (or your authorized representative) may submit a request by email to customer_service@natures-twist.com.

The information we collect automatically may include personal information, and we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our website and to deliver a better and more personalized Website experience, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our website according to your interests.
- Speed up your searches.
- Recognize you when you return to our website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our website.
- **Flash Cookies.** Certain features of our website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security

settings for Flash cookies, see [Choices About How We Use and Disclose Your Information](#).

- **Web Beacons.** Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website, are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control third-party tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt-out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To notify you about changes to our website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our website.
- In any other way, we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about goods and services that may be of interest to you. If you do not want us to use your information in this way, you (or your authorized representative) may submit an opt-out request by email to customer_service@natures-twist.com.

For more information, see [Choices About How We Use and Disclose Your Information](#).

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information

for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect, or you provide as described in this privacy policy:

- To our parent companies, subsidiaries, and affiliates, including our subsidiaries and affiliates that market beverage brands such as Orangina, Nature's Twist, Twisted Punch, and Sparkling Oh!
- To contractors, service providers, and other third parties we use to support our business, who will use it in accordance with their policies.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. For more information, see Choices About How We Use and Disclose Your Information.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use to contact you, we will use that email for future correspondence, including marketing emails.
- For any other purpose disclosed by us when you provide the information.
- We may disclose your information during a promotional period with promotional partners for email communication.
- With your consent.
- We may also disclose your personal information:
 - To comply with any court order, law, or legal process, including responding to any government or regulatory request.
 - To enforce or apply the terms of any other agreements between us, including for billing and collection purposes.
 - If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Ventures Food & Beverage and its affiliates, our customers, or others.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending us an email with your request to customer_service@natures-twist.com.
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by the Company to promote our own or third-party products or services, you can opt-out by following the instructions in any promotional email message you get from us or our promotional partners, or you may send us a return email asking to be omitted from future email distributions.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by submitting a request by email to customer_service@natures-twist.com.

We do not control the third-party collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt-out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) for more information.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: customer_service@natures-twist.com. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Accessing and Correcting Your Information

You may send us an email at customer_service@natures-twist.com to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) for more information.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit the Nature's Twist Privacy Policy on www.natures-twist.com.

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to customer_service@natures-twist.com.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions conducted through this Website will be encrypted.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: customer_service@natures-twist.com.

Last updated April 13, 2022

Privacy Policy for California Residents

This **Privacy Policy for California Residents** supplements the information contained in the [Website Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

This Policy does not apply to workforce-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

Information We Collect and Share

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope.

Below, we provide a list of categories of personal information as set forth in the CCPA that have been collected, disclosed for business purposes, or sold for commercial purposes (as defined by the CCPA) during the preceding 12 months, as well as certain other information. Please see the other sections of the Privacy Policy for additional information and context.

Category	Examples	Collected	Explanation
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	YES	We may use this information to respond to your questions, to enable you to participate in our programs (including sweepstakes or contests), to process your registration with sites and apps, and for other business purposes.
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	NO	
Commercial information.	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	We may use your information to provide you with products, to identify other products and offers that may be relevant to you, and for other business purposes.
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	We may use this information to improve our Services, to better understand the visitors who come to our Services and what content is of interest to them, and for other business purposes.
G. Geolocation data.	Physical location or movements.	YES	We may use this information to improve the quality, security, and relevance of our Services to our visitors and for other business purposes.
K. Inferences drawn from other personal information.	Our inferences about you.	YES	We may use this information to personalize your experience with us, and for other business purposes.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms, you complete on our website.
- Indirectly from you. For example, from observing your actions on our website.
- From third parties. For example, from our business partners. We may also receive information from commercial sources such as companies who compile information about shoppers and their preferences. Social media platforms may also give us information about you, and we may get information about your interactions with our ads on third-party sites

We share personal information with third parties in various ways as described in our Privacy Policy. We do not consider the ways we share your personal information to comprise the sale of your information. You may learn about ways in which you can control the collection of information about you by visiting Personal Information Opt-Out and Opt-In Rights.

Use of Personal Information

We may use, sell, or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information or ask a question about our products, we will use that personal information to respond to your inquiry. We may also save your information to facilitate subsequent communication with you.
- To provide, support, personalize, and develop our website, products, and services.
- To process your requests, transactions, and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigating and addressing your concerns and monitoring and improving our responses.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets, whether as a going concern or as part of

bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website users or consumers is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know and Data Portability

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the "right to know"). Once we receive your request and confirm your identity (see [Exercising Your Rights to Know or Delete](#)), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.
- The specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete; Right to Access

You may request that we delete the Personal Information that we've collected from or about you. If we cannot delete all your Personal Information, we will let you know the reason for non-deletion, such as if we need to complete a transaction for you, or for a legal reason.

We may take steps to verify your identity based on the information we have on file about you before responding to your Access or Deletion Request. You may need to provide your email address to be used for this purpose.

You may make up to two requests per year for information as to:

- The categories of Personal Information that we've collected and sold about you, or shared for a business purpose with our service providers
- The sources from which we collected such information

- The third parties with whom we've shared that Personal Information and to whom we've sold that Personal Information.
- The business or commercial purpose for collecting or selling that Personal Information.
- The specific pieces of Personal Information we've collected about you.

Exercising Your Rights to Know or Delete

To exercise your rights (or those of your child) to know or delete described above, please submit a request by emailing us at customer_service@natures-twist.com.

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete. We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

For instructions on exercising your sale opt-out or opt-in rights, see [Personal Information Sales Opt-Out and Opt-In Rights](#).

Response Timing and Format

We will confirm receipt of your request within ten (10) business days.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

If you are age 16 or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not knowingly sell the personal information of consumers we know are less than 16 years old. Consumers who opt-in to personal information sales may opt-out of future sales at any time.

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by email at customer_service@natures-twist.com.

[[HYPERLINKED URL with the title "Do Not Sell My Personal Information"](#)]

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back into personal information sales at any time by:

[OPT-IN INSTRUCTIONS OR URL LINK]

You do not need to create an account with us to exercise your opt-out rights. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination and Notice of Financial Incentive

We will not discriminate against you for exercising any of your CCPA rights.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to customer_service@natures-twist.com.

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which we collect and use your information described here and in the **Privacy Policy**, your choices, and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at: customer_service@natures-twist.com.

If you need to access this Policy in an alternative format due to having a disability, please contact customer_service@natures-twist.com.

Last Updated April 13, 2022

California Consumer Privacy Act (CCPA) Notice at Collection

Ventures Food & Beverage, LLC and its affiliates collect the following personal information (PI) categories: Identifiers; California Customer Records PI categories; Commercial information; Internet or other similar network activity; Geolocation data; Inferences drawn from other personal information.

We collect this PI for the following business purposes, among others: To provide, support, personalize, and develop our Website, products, and services; To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses; To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website, third-party sites, and via email or text message (with your consent, where required by law); For testing, research, analysis, and product development, including to develop and improve our Website, products, and services; For the other business purposes identified on our [Privacy Policy for California Residents].

While we do not sell Personal Information for monetary value, we may disclose Personal Information to third parties, such as our dealers, in such a way that may be considered a sale of Personal Information under CCPA. To stop such sales see [Personal Information Sales Opt-Out and Opt-In Rights].

For more information about our California privacy policy see [Privacy Policy for California Residents].

If you have any questions about this Notice or need to access it in an alternative format due to having a disability, please contact customer_service@natures-twist.com.

Updated April 13, 2022