

**Effective Date: 04/15/2021**

**Last Reviewed on: 04/15/2021**

**Welcome to Sands Lane, a brand of Sands Lane Holdings, LLC (“SLH”), (SLH, “we”, “us”, or “our”). This privacy policy describes how we treat and use the information we collect when you visit or use our website [www.sandslane.com](http://www.sandslane.com) or any mobile-optimized version of the website to which this policy is linked as well as any affiliated portfolio brand website (e.g. [www.drinkmalus.com](http://www.drinkmalus.com)) (collectively, “Website”), including when you sign-up for our newsletter or related companies’ newsletters. Our Website is operated in the United States and in accordance with the laws of the United States. We respect your privacy and are committed to protecting it through our compliance with this policy.**

**We provide you this privacy policy to help you understand the kinds of information we may gather about you when you visit the Website or use any of its services, how we may use, maintain, protect and disclose the information, and how you can control, correct and/or update the information.**

**By visiting the Website or using the services, you are accepting the policies and practices described in this privacy policy and our Terms of Use located at <https://www.sandslane.com/terms-of-use.pdf>. Each time you visit the Website or use the services, you agree and expressly consent to our collection, use and disclosure of the information that you provide as described in this policy. 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 Notice.**

## **Collection of Information**

**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.**

**De-identified or aggregated consumer information.**

**We may collect the following categories of personal information from our consumers:**

**Information You Provide. We collect personal information that you voluntarily provide. For instance, contact information, and other personal details may be collected when you: sign up for our newsletter or affiliated companies' newsletter, complete a survey, post a comment on our Website, enter a sweepstakes or contest, or participate in our social networking features. Information you may be asked to provide may include your email**

address, your name, buying preferences, annual income, other demographic or profile information, Twitter, Facebook and other social media network usernames and aliases and other information you choose to submit.

If you purchase products or services through our Website storefront(s), we and our partners, including merchants and third-party credit card processors, may access and collect your personal information, including, but not limited to, your full name, address, email address, phone numbers(s), and credit card details.

**Location Information and IP Address.** We and our service providers and advertisers may collect and share your general location for personalization and marketing purposes. We, or our service provider, will obtain your prior consent to such collection to the extent required by applicable law. An "Internet protocol address" or "IP Address" is a number that is automatically assigned to your computer when you use the Internet. We, or our service providers, may use your IP Address when you access the Website or use other means to assist with delivering geographically targeted advertisements. For more information, please see the "Cookies and Advertising" section below.

**General Usage Information.** We may gather usage information about Website users on an anonymous basis. Examples of such information include: amount of time spent on our site, pages viewed, websites users originated from and websites users visit after leaving our Website. This information helps us create a faster, efficient and more relevant website. We may also share aggregate and anonymous usage information with our prospective and actual business partners, advertisers and other third parties for any business purpose.

## **Website Cookies**

Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page. We may also use web beacons, pixel tags, log files, or other technologies to automatically collect certain information when you use the Website.

For example, we may automatically collect certain information from you such as your browser type, device model and operating system, software version, Internet Protocol ("IP") address, and the domain name from which you accessed the Website. We also may collect information about your use of the Website including the date and time you access the Website, the areas or pages of the Website that you visit, the amount of time you spend using the Website, the number of times you return, whether you open, forward or click-through emails and ads, and other Website usage data.

We use cookies to help us recognize you and provide you with a good user experience when you browse our Website. We also use cookies and other similar technology to improve our Website.

**We may use the following categories of cookies on the Website:**

**Strictly Necessary Cookies:** These cookies are important in order to enable you to move around the Website and use website features (e.g. to submit forms to contact and send information to us and to allow detection of Javascript in your browser in order to enable or disable features). Without these cookies, services you have asked for, cannot be provided. Some of these cookies are placed by partners which operate the Website on our behalf. We don't use these cookies to gather information about you that could be used for profiling, advertising or remembering where you've been on the internet.

**Performance Cookies:** These cookies collect anonymous information on how people use the Website. For example, we may use cookies to help us understand how you arrive at the Website, browse or use the Website or certain features on the Website and highlight areas where we can improve. The data stored by these cookies never shows personal details from which your individual identity can be established. We use Google Analytics, run by Google Inc., for example, to track website usage and activity.

**Functionality Cookies:** These cookies remember choices you make such as the country from which you visit our Website and the corresponding language. These can then be used to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant. The information these cookies collect may be anonymised, and they cannot track your browsing activity on other websites.

Specifically, we use the following cookies (but may add other similar cookies in the future to help us provide a better user experience): Google Tag Manager; Google Analytics; Google Adwords; and Facebook Ads.

If you don't want to receive cookies, you may adjust your browser or operating system settings to limit this tracking or to decline cookies, but by doing so, you may not be able to use certain features on the Website or take full advantage of all of our offerings and services. Check the "Help" menu of your browser or operating system to learn how to adjust your tracking settings or cookie preferences.

To opt out of being tracked by Google Analytics across our Sites visit <https://tools.google.com/dlpage/gaoptout>.

Our Website is currently not setup to respond or process web browser "Do Not Track" ("DNT") signals. We do adhere to the Self-Regulatory Principles for Online Behavioral Advertising of the Digital Advertising Alliance (for more information [click here](#)).

## **Online Advertising**

We engage in on-line advertising that appears on third party websites to keep you aware of our brands, events, products and services. We do this using a variety of digital marketing networks and a variety of advertising technologies like pixels, ad tags, cookies and mobile identifiers as well as service providers such as Google and Facebook. The

banners and ads you see will be based on information we hold about you, from what you've bought or responded to in the past or your customer journey on our websites, including cookies used on our Website (see above). We are not responsible for the data and information treatment employed by other third party websites where our advertising is displayed (our Privacy Policy only refers to our websites), so please always read the privacy policy on third party websites.

We may use your personal information to deliver customized advertising to you on our Website, on other websites and on other digital and offline media channels. We may allow others to provide analytics services and serve advertisements on our behalf across the Internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Service and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Service and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices).

If you would like more information about behavioral advertising and to know your choices with respect to it, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices). Many vendors that engage in behavioral advertising participate in the Digital Advertising Alliance (DAA) and abide by DAA principles. If you wish to opt out of participating in advertising programs conducted by DAA members or learn more about the DAA, please go to the DAA Ad Choice Page and follow the instructions. After you opt-out, you will still see advertisements, but the advertising may not be as relevant to your interests. If you change your computer, change your browser or delete your cookies, you will need to renew your opt-out. For opt-out options specific to Google Analytics, please visit [tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout). If you delete your cookies or upgrade your browser after having opted out, you will need to opt out again. If you use multiple browsers or devices, you will need to execute this opt-out on each browser or device.

Advertisers or other third parties on the Website may also engage in behavioral advertising and use cookies and web beacons in the manner described above. We do not control these advertisers or other parties' use of cookies or web beacons or what they do with the information they collect.

We may use Facebook to deliver ads on the Website. Facebook may use information you share on Facebook and information gathered from your use of other websites and apps to delivery ads to you. To learn more about this type of advertising and your choices about it, visit [www.facebook.com/about/ads](http://www.facebook.com/about/ads).

**Our Website is currently not setup to respond or process web browser “Do Not Track” (“DNT”) signals. We do adhere to the Self-Regulatory Principles for Online Behavioral Advertising of the Digital Advertising Alliance (for more information click here).**

**Information We Receive From Third Parties.** We may combine online and/or offline information received from third parties with the information we have already collected from you via our Website or services. The third party information is used for a variety of purposes including to verify other information about you (e.g., verify your mailing address to send you requested products or services), to conduct research, and to enhance the content and advertising we provide to you.

### **Categories of Information We Collect**

<b>Category</b>	<b>Examples</b>
-----------------	-----------------

<b>A. Identifiers.</b>	<b>A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.</b>
------------------------	---

<b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	<b>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</b>
--	--

<b>C. Protected classification characteristics under California or federal law.</b>	<b>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).</b>
---	---

<b>D. Geolocation data.</b>	<b>Physical location or movements.</b>
-----------------------------	--

<b>E. Commercial information.</b>	<b>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</b>
-----------------------------------	---

<b>F. Internet or other similar network activity.</b>	<b>Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.</b>
---	---

<b>G. Professional or employment-related information.</b>	<b>Current or past job history or performance evaluations.</b>
---	--

<b>H. Inferences drawn from other personal information.</b>	<b>Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</b>
---	--

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

**Directly from you. For example, from forms you complete or products and services you purchase.**

**Indirectly from you. For example, from observing your actions on our Website or websites of our affiliates.**

#### **Use of Information**

**We use your personal information to:**

**Operate, maintain, and improve the Website;**

**Develop new features and content for the Website and conduct research related to the Website, the event, or other endeavors;**

**Provide you with information on venues, events, exhibits, and special offers related to Sands Lane and our affiliates;**

**Provide you with customized content, targeted offers, and advertising on the Website or other sites and apps;**

**Monitor and analyze trends, usage, and activities in connection with the Website and our events;**

**To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns;**

**Respond to your inquiries and provide customer service;**

**To create, maintain, customize, and secure your account with us;**

**To process your requests, purchases, transactions, and payments;**

**To provide you with support, respond to your inquiries, and address your concerns and monitor and improve our responses;**

**Facilitate contests, sweepstakes, and promotions and process and deliver entries, prizes, and rewards;**

**Send you information, newsletters, and promotional materials from us and our partners.**

**You can opt-out of receiving promotional materials at any time;**

**Protect the security or integrity of the Website and our business;**

**Link or combine with information we get from others to help understand your needs and provide you with better service;**

**To personalize your Website experience and to deliver content, product, and service offerings relevant to your interests, including targeted offers 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;**

**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;**

**Carry out any other purpose described to you at the point of data collection; and**

**For other purposes with your consent or as permitted by law.**

**We may disclose and release your personal information (including without limitation content or other data posted, uploaded or provided by you) to third parties:**

**To enable third party service providers to provide products, services or functions on our behalf or to help us to operate our business and the Website. Such service providers may include vendors and suppliers that provide us with technology, research, data analytics, ad serving, email services, payment processing, customer service, and/or marketing assistance.**

**To comply with valid requirements such as a law, regulation, search warrant, subpoena or court order;**

**In special cases, such as a physical threat to you or others, a threat to homeland security, a threat to our system or network, or in any cases in which we believe it is reasonably necessary to investigate or prevent harm, fraud, abuse, illegal conduct or violation or alleged violation of this privacy policy or other agreement we may have with you;**

**To enforce the Terms of Use;**

**With your consent or in accordance with your indicated preferences (e.g., you indicated to receive materials directly from a third party partner);**

**To respond to your requests for customer service; and**

**In connection with a sale, merger, transfer, exchange, or other disposition (whether of assets, stock, or otherwise) of all or a portion of the business conducted by the Website to which this policy applies, in which case the acquiring company will possess the information collected by us.**

**We may also disclose your information to our subsidiaries, affiliates or parent company.**

**Some of our service providers may not be located in the United States and/or Canada.**

**If we partner with a retailer or other third party to offer online shopping opportunities, promotions, contests or sweepstakes, polls, surveys, services, subscriptions and other applications, then personally identifiable information you provide in connection with the above transactions may be collected directly by or shared by us with the third party.**

**These third parties will use your information in accordance with their own privacy policy.**

**In some cases, such as where a provider's service is embedded in our Website (such as an embedded video or social network tool), you must contact the third party to learn about your objection options, and the third party (not us) will be responsible for addressing your objection. We are not responsible for their privacy policy or practices.**

**We may share anonymous information about you with third parties for any purpose.**

**Personal information that has been aggregated with the personal information of other users in a way that does not identify you as an individual shall be treated as anonymous**

information. Currently we are using Google Analytics to analyze the audience of the website and improve our content. For further information on the privacy policy concerning Google Analytics, please go here, [support.google.com/analytics/answer/6004245?hl=en](https://support.google.com/analytics/answer/6004245?hl=en)

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.

If you do not want us to use or disclose personal information collected about you in the ways identified in this privacy policy, you should not use the Website or services.

#### **How to Opt Out**

You may opt-out of receiving promotional communications from Sands Lane and can unsubscribe from receiving our newsletters or commercial emails at any time. You can unsubscribe by clicking on the “Unsubscribe” link in the footer of any Company email and following the instructions. Please note that you may continue to receive certain communications from us, such as transactional or relationship messages, and/or messages about your account/profile. In order to opt out of our newsletters or commercial emails, you can also contact us at [privacy@sandslane.com](mailto:privacy@sandslane.com)

#### **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.

#### **Access to Specific Information and Data Portability Rights**

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. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), 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 that personal information**

**The categories of third parties with whom we share that personal information**

**The specific pieces of personal information we collected about you (also called a data portability request)**

**If we disclosed your personal information for a business purpose, disclosures identifying the personal information categories that each category of recipient obtained.**

**Deletion Request Rights**

**You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.**

**We may deny your deletion request if retaining the information is necessary for us or our service providers to:**

**Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.**

**Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.**

**Debug products to identify and repair errors that impair existing intended functionality.**

**Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.**

**Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).**

**Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.**

**Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.**

**Comply with a legal obligation.**

**Make other internal and lawful uses of that information that are compatible with the context in which you provided it.**

**Exercising Access, Data Portability, and Deletion Rights**

**To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:**

**Calling us at (805) 419-0508**

## **Visiting CCPA Request Submission Form**

**For account holders, accessing the submission form link from inside your account (instructions below).**

**Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To designate an authorized agent, you must provide a valid power of attorney under California's Probate Code or other verifiable written documentation granting the agent permission to make the request.**

**You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:**

**Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include:**

**For password-protected account holders, you can access our secure request form by logging into your account and using the submission form link.**

**For non-account holders, using the CCPA Request Submission Form . You must provide at least two data points that we can match with the personal information we have collected about you.**

**Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.**

**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.**

**Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account more easily verifiable when the request relates to personal information associated with that specific account.**

**We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.**

## **Response Timing and Format**

**We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to an additional 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 the verifiable consumer request's receipt. 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 usable 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.**

#### **NON-DISCRIMINATION**

**We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:**

**Deny you goods or services.**

**Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.**

**Provide you a different level or quality of goods or services.**

**Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.**

**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.**

#### **Children**

**We do not offer the Website to anyone under the age of twenty-one (21) and do not knowingly collect personal information from children under 13. No one under age 13 may visit or provide any information to or on the Website. If you are under 13, do not use or provide any personal information on or through the Website, register on the Website, or use any of the interactive or public comment features of our Website or provide any information about yourself to us, including your name, email address or any screen name or user name you may use.**

**If you are the parent or guardian of a child whom you believe has disclosed personal information to us, please contact us at [privacy@sandslane.com](mailto:privacy@sandslane.com) so that we may delete and remove such child's information from our systems. In addition, in the event that a minor under the age of 18 in California uses the Website, the minor may request that we remove content or information posted by the minor on the Website by sending an email to [privacy@sandslane.com](mailto:privacy@sandslane.com). However, such removal may not remove all traces of such posting everywhere online, since others may have shared content or information.**

**Your California Privacy Rights: Notice to California Customers**

Subject to certain limits under California Civil Code § 1798.83, if you are a California resident, you may ask us to provide you with (i) a list of certain categories of personal information that we disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (ii) the identity of third parties that received personal information from us for their direct marketing purposes during that calendar year. The list will not be specific to disclosures of your particular personal information. To make such a request, send us an email at [privacy@sandslane.com](mailto:privacy@sandslane.com), or write us at Sands Lane, 20631 Ventura Blvd. #203, Woodland Hills, CA 91364, Attn: Compliance and include “Your California Privacy Rights” in the subject of your email or letter, your name and complete mailing address. We are not responsible for requests that are not labeled or sent properly, or do not have complete information. Please note that we are only required to respond to one request per customer each year.

## **Territories**

We make no representation or warranty that the content and materials on the Website are appropriate or available for use in locations outside of the United States. Those who choose to access the Website or use the services from other locations do so on their own initiative and at their own risk, and are responsible for compliance with local laws, if and to the extent applicable.

## **Modifications**

We may make changes to this privacy policy at any time. We will post any changes to this privacy Notice on this webpage located at [www.sandslane.com/privacy-policy.pdf](http://www.sandslane.com/privacy-policy.pdf) and update the date at the top; so be sure to check back periodically to stay aware of any modifications. Your continued use of the Website after this privacy policy has been amended shall be deemed to be your continued acceptance of the terms and conditions of the privacy policy, as amended.

## **Contact Us**

**To make a CCPA request please use the URL below:**

**<https://sandslane.com/ccpa>**

**If you have questions about this privacy policy, or about the Website, please contact us at [privacy@sandslane.com](mailto:privacy@sandslane.com)**

**For any questions related to how Sands Lane or its affiliates collects and uses your data under this policy, your choices and rights regarding such use, please contact [privacy@sandslane.com](mailto:privacy@sandslane.com).**

**Phone: (805) 419-0508**

**Websites: [SandLane.com](https://SandLane.com)**

**Postal Address:**

**Sands Lane**

**20631 Ventura Blvd. #203**

**Woodland Hills, CA 91364**

**Attn: Compliance – Privacy Request**

**CCPA Request Submission Form**