

# Privacy Policy

Giorgio Foods Inc. (the "Company" or "We") respect your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy describes how your personal information is collected, used, and shared when you visit or make a purchase from [giorgio-foods.myshopify.com](http://giorgio-foods.myshopify.com) (the "Site").

PLEASE NOTE THAT THIS WEBSITE IS SET UP FOR SALES TO CUSTOMERS BASED IN THE UNITED STATES ONLY. THIS WEBSITE MAY NOT BE COMPLIANT WITH EUROPEAN DATA PRIVACY LAWS INCLUDING, BUT NOT LIMITED TO THE GENERAL DATA PRIVACY DIRECTIVE (GDPR). IF YOU ARE SUBJECT TO THESE LAWS, PLEASE EXIT THIS WEBSITE AND PLEASE DO NOT SHARE ANY PERSONAL OR PERSONALLY IDENTIFIABLE INFORMATION WITH US.

## PERSONAL INFORMATION WE COLLECT

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. Collecting this information helps us to both improve our Site and to deliver a better and more personalized service, as well as to process your request for products we offer. This may enable us to:

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

We refer to this automatically-collected information as "Device Information".

We collect Device Information using the following technologies:

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.
- "Log files" track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- "Web beacons", "tags", and "pixels" are electronic files used to record information about how you browse the Site.

Additionally when you make a purchase or attempt to make a purchase through the Site, we collect certain information from you, including your name, billing address, shipping address, payment information (including credit card numbers, details concerning other methods of payment, etc.), email address, and phone number. We refer to this information as "Order Information".

When we talk about "Personal Information" in this Privacy Policy, we are talking both about Device Information and Order Information. It does not include any information collected by the Company through any offline source or through any third party, including any third party website.

You also may provide information to be published or displayed on public areas of the Site (if any), or transmitted to other users of the Site or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although we may limit access to certain areas of the Site through certain privacy settings administered as part of the log-on process

for your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Site with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

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, your choice is not to use our Site. By accessing or using this Site, you agree to the provisions of this privacy policy. This policy may change from time to time (see “Changes to Our Privacy Policy” below). Your continued use of this Site after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We use the Order Information that we collect generally to fulfill any orders placed through the Site (including processing your payment information, arranging for shipping, and providing you with invoices and/or order confirmations). Additionally, we use this Order Information to:

- Communicate with you;
- Screen orders for potential risk or fraud; and
- When in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.

We may also use your Personal Information to solicit feedback from you regarding our products and services, as well as to send to you information concerning our existing and potential or future products and services.

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

In addition, Personal Information may be used:

- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Site or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Site.
- 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, please adjust 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 our Site may then be inaccessible or not function properly.

If you do not want us to sell or share your personal information with unaffiliated or non-agent third parties for promotional purposes, or if you wish not to receive any promotional offers or targeted advertising from us, you can “Opt-Out” by sending us an email with your request to **privacy@thegiorgicompanies.com** or by calling **800-535-9925**. Where we have sent you a promotional e-mail, you may also send a response e-mail asking to be omitted from such future e-mail distributions. Please note, however, that this “Opt Out” option will not apply to information we

may provide to you as a result of your product purchase, warranty registration, product service experience evaluation or other direct transaction between you and the Company.

California residents may have additional personal information rights and choices. Please see “Your California Privacy Rights” below for more information.

### **SHARING YOUR PERSONAL INFORMATION**

We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, we use Shopify to power our online store--you can read more about how Shopify uses your Personal Information here: <https://www.shopify.com/legal/privacy>. We also use Google Analytics to help us understand how our customers use the Site -- you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

We may disclose Personal Information that we collect or that you provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business where needed for their services provided they are bound by contractual obligations to keep such Personal Information confidential and they use it only for those purposes.
- 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 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 Site users is among the assets transferred.
- To fulfill a purpose for which you have provided
- For any other purpose disclosed by us when you provide the Personal Information.
- With your consent.
- To enforce or apply our Site terms of use limitations (see <http://www.savorywild.com/terms-of-use/>) for our terms of use) or those terms of any agreements we may have with you or that is entered into for you or on your behalf, including for billing and collection purposes.
- If We believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction. Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

### **BEHAVIOURAL ADVERTISING**

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative’s (“NAI”) educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by using the links below:

- Facebook: <https://www.facebook.com/settings/?tab=ads>
- Google: <https://www.google.com/settings/ads/anonymous>
- Bing: <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance’s opt-out portal at: <http://optout.aboutads.info/>.

### **DO NOT TRACK**

Please note that we do not alter our Site’s data collection and use practices when we see a Do Not Track signal from your browser.

## **YOUR RIGHTS**

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If you are a European resident, you have the right to access personal information we hold about you and to ask that your personal information be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.

Additionally, if you are a European resident we note that we are processing your information in order to fulfill contracts we might have with you (for example if you make an order through the Site), or otherwise to pursue our legitimate business interests listed above. Additionally, please note that your information will be transferred outside of Europe, including to Canada and the United States.

## **DATA RETENTION**

When you place an order through the Site, we will maintain your Order Information for our records unless and until you ask us to delete this information.

## **CHILDREN'S PRIVACY**

Under Age 13

Our Site is not specifically directed toward children, and we do not knowingly collect personal information from persons under the age of 13 on our Site without verifiable parental consent. If we learn that a child under the age of 13 has submitted personally identifiable information online without parental consent, we will take all reasonable measures to delete such information from our databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware of any personally identifiable information we have collected from children under 13, please contact us at **privacy@thegiorgicompanies.com** or by calling **800-535-9925**

Under Age 18

Minors under 18 years of age may have the Personal Information that they provide to us through the Site deleted by sending an email to **privacy@thegiorgicompanies.com** requesting deletion or by calling **800-535-9925**. Please note that, while we make reasonable efforts to comply with such requests, deletion of your personal information does not ensure complete and comprehensive removal of that data from all systems.

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" below for more information.

## **CHANGES TO OUR PRIVACY POLICY**

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. If We make material changes to how We treat our users' Personal Information, We will post such changes on the Site home page and/or provide you with personal notice of the changes made. The date the privacy policy was last revised is

identified at the end of this document. You are responsible for ensuring We have an up-to-date active and deliverable email address for you, and for periodically visiting our Site and this Privacy Policy to check for any changes.

### **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, please see the “CCPA PRIVACY NOTICE PROVISIONS FOR CALIFORNIA RESIDENTS” attached to this Privacy Notice. The California “Shine the Light” law (Civil Code Section § 1798.83) permits users of our Site who are California residents to request certain information regarding our disclosure of their Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to **privacy@thegiorgicompanies.com** or contact us by writing us at the mailing address provided under “Contact Us” below,

### **CONTACT US**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at **privacy@thegiorgicompanies.com** or by mail using the details provided below:

Giorgio Foods, Inc.  
c/o The Giorgio Companies Inc.  
Re: Privacy Compliance Officer  
PO Box 96 Temple Pennsylvania US 19560

Phone: **(800) 535-9925**

Ver. Date: December 16<sup>th</sup>, 2019

## CCPA Privacy Notice Provisions for California Residents

Effective and Last Review Date: December 5<sup>th</sup>, 2019

The provisions of this is Privacy Notice for California Residents supplements the information contained in the Company's general Privacy notice 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 notice.

### INFORMATION WE COLLECT

Our Site collects information as described within our general Privacy Policy. In particular, our Site has collected the following categories of Personal Information from its Consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	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.	We only collect the following: <ul style="list-style-type: none"><li>- Real Name</li><li>- Postal Address</li><li>- Your Giorgio Account Name</li><li>- E-mail Address</li></ul>
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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 information, debit card information, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	We only collect the following: <ul style="list-style-type: none"><li>- Real Name</li><li>- Postal Address</li><li>- Telephone Number</li><li>- Your Giorgio Account Name</li><li>- E-mail Address</li><li>- Credit Card Information</li><li>- Debit Card Information</li></ul>

C. 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).	We only collect the following: - Age (if over 16)
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	We only collect the following: - Products Purchased
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO

K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
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We obtain the 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 your actions on our Site.

**USE OF PERSONAL INFORMATION**

We may use or disclose the Personal Information we collect for one or more of the purposes as outlined within the general Privacy Policy under “HOW DO WE USE YOUR PERSONAL INFORMATION?”.

**SHARING PERSONAL INFORMATION**

We may share the Personal Information in accordance with the provisions of our general Privacy Policy under “SHARING YOUR PERSONAL INFORMATION”. Our disclose or sale of your Personal Information is subject to your right to “Opt-Out” of those sales (see “Personal Information Sales Opt-Out and Opt-In Rights” below). If We disclose Personal Information for a business purpose, We enter into a contract with the recipient that limits use of the Personal Information for the described purpose and requires the recipient to both keep that Personal Information confidential and not use it for other than for the described purpose.

We may share your personal information with the following categories of third parties:

Service providers for purposes of purchases or for management of our website

Governmental Agencies, where required under subpoena or other legal requirement

To entities as part of any Merger or Acquisition process

**DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE**

In the preceding twelve (12) months, any personal information the Company may have disclosed would be those Categories of personal information as identified in the chart under “Information We Collect” and solely for the purpose of product purchases or in response to Consumer questions.



Specifically, we disclose your personal information for a business purpose to the following categories of third parties:

Service providers.

Sales of Personal  
Information

In the preceding twelve (12) months, Company had not sold personal information

## **YOUR RIGHTS AND CHOICES**

The CCPA provides Consumers with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

### ***A) 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” below), 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; and the specific pieces of Personal Information we collected about you (also called a data portability request). If we sold or disclosed your Personal Information for a business purpose, we will provide two separate lists disclosing which Personal Information was “sold” and which were only “disclosed” for a business purpose.

### ***B) 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” below), 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 provider(s) to:

1. 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, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another Consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. 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.
7. Enable solely internal uses that are reasonably aligned with Consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. 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 contacting us at [privacy@thegiorgicompanies.com](mailto:privacy@thegiorgicompanies.com) or by calling **800-535-9925**. You may also write us at the address provided in the general Privacy Notice under "CONTACT US".

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

- a. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and
- b. 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. 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 **forty-five (45) days** of its receipt. If We require more time (up to 90 days), We will inform you of the reason and extension period in writing. If you have an account with us, We will deliver our written

response to that account. If you do not have an account with us, We will deliver our written response by mail or electronically, at your option, to the address you provide.

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. 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, specifically, it will be either in a written format using a Word, Excel or Access document or be provided in image format using Adobe .pdf or jpeg format.

We do not charge a fee to process or respond to your verifiable consumer request unless it would require an excessive effort to complete, is 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 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to Opt-Out"). Our policies regarding Personal Information of minors (under the age of 18) is specified within our general Privacy Policy under "CHILDREN'S PRIVACY". We will not sell the Personal Information of consumers We actually know are less than 16 years of age unless we receive affirmative authorization (the "right to Opt-In") from either the Consumer's parent or guardian. 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 visiting the following Internet Web page link:

[http:// www.savorywild.com /Do Not Sell My Information/](http://www.savorywild.com/DoNotSellMyInformation/)

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 in to personal information sales at any time by notifying us at [privacy@thegiorgicompanies.com](mailto:privacy@thegiorgicompanies.com) or by calling **800-535-9925**.

We will only use Personal Information provided in an Opt-Out request to review and comply with the 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; or, 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.

#### **OTHER CALIFORNIA PRIVACY RIGHTS**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Site 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 refer to the section "YOUR CALIFORNIA PRIVACY RIGHTS" within our general Privacy Policy.