

Privacy Policy

This Privacy Policy ("Policy") sets forth Paso Robles Wine Warehouse, LP dba Paso Robles Wine Services ("PRWS") policies regarding the collection and use of information via this Portal located at <http://portal.pasorobleswineservices.com/>.com (including all pages under such second level domain name, collectively, the "Portal"). The Portal is generally accessible by all visitors ("Visitors"); however, portions of the Portal are only accessible by certain Visitors who register to use the PRWS's online services ("Online Services"). All Visitors registered to use the Online Services are referred to collectively herein as "Registered Visitors." Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the PRWS Portal Terms of Use.

INFORMATION: COLLECTION AND USE

GENERAL

Visitors (including without limitation Registered Visitors) understand and agree that PRWS may collect, maintain, and process information provided by them to PRWS, and information otherwise collected by PRWS concerning such Visitors on and through the Portal and the Online Services.

PUBLIC AREAS OF THE PORTAL

All Visitors may visit the public areas of the Portal without disclosing any personal information about themselves. However, Visitors will have the opportunity to request to receive information from PRWS, or to otherwise interact on or with the Portal, in which case an e-mail or other address or contact information or other personalized information may be collected in order to allow PRWS to comply with the request, and for other purposes as may be disclosed at the time the request is made or otherwise as set forth in this Policy. Visitors may elect to opt-out from receiving marketing communications by (a) following the instructions in OPT-OUT CHOICES , below, (b) checking appropriate opt-in or opt-out boxes which may be provided on the collection form or (c) as set forth in the communication sent from PRWS.

ONLINE SERVICES REGISTRATION INFORMATION

In order to participate in the Online Services, PRWS requires Registered Visitors to have registered with the Online Services by, among other things, providing contact information such as (for illustration purposes only) user ID, password, name, title, department, business address, business telephone number, business e-mail address and other contact information ("Registration Information"). From time to time Registered Visitors may review their Registration Information by visiting the appropriate area of the Online Services and revising their Registration Information. PRWS may also use Registration Information to communicate with all Registered Visitors regarding changes in Online Services functionality, features, billing, help desk and other activities relating to the operation of the Online Services. PRWS may disclose the Registration Information of a Party to administrators and/or other Parties who are designated by such Party to be provided access to such information. At Your option, some portions of Your Registration Information may be made available to other Visitors of the Portal. PRWS may also use Registration Information to send Registered Visitors information about products or

services available on or through the Online Services and offers made available by PRWS's partners, which may be sent by PRWS. Instructions on how to request that PRWS not send such future communications (not including communications necessary for the operation of the Online Services) or that PRWS not share Registration Information with third parties for marketing purposes, are set forth in OPT-OUT CHOICES, below and, for PRWS transmitted material which is unrelated to the operation of the Online Services, in each communication.

USAGE DATA

PRWS will record and collect information about how all Visitors use the Portal, including the Online Services. This data may include a Visitor's domain name, language, type of browser and operating system, Internet service provider, Internet protocol (IP) address, the Web site from which they arrived at the Portal, the amount of time spent on the Portal or using the Online Services and the ways in which they use the Portal or the Online Services (collectively, "Usage Data"). PRWS will monitor and use Usage Data in aggregated form to measure the Portal's performance and Online Services activity and improve the Portal's design and functionality. PRWS may also use Usage Data in aggregated form to develop and distribute to third parties statistical and other information about how the Portal and Online Services are used and for other marketing purposes. PRWS may also disclose aggregate Usage Data to other Visitors. PRWS may also use Usage Data in un-aggregated form to investigate and prosecute security violations or to identify a particular Visitor or Registered Visitor who engaged in particular transactions.

COOKIES

"Cookies" are pieces of information that are placed on a Visitor's computer hard drive to enable the individual to more easily communicate and interact with the Portal. PRWS uses cookies to customize Your experience on the Portal. PRWS also uses Cookies to record how many times a Visitor has visited our Portal and what pages the Visitor has accessed. You may, however, disallow receiving Cookies at any time through Your web browser, although this may affect the usability of the Portal. It is not PRWS's intention to use Cookies to retrieve information that is unrelated to the Portal or Your interaction with the Portal.

OPT-OUT CHOICES

To "opt-out" of (1) receiving communications from PRWS (except for communications necessary for the operation of the Portal, the Online Services, or as otherwise permitted under this Policy), (2) having contact information disclosed to third parties for marketing purposes (except as necessary for PRWS to operate the Portal, Online Services, or as otherwise permitted under this Policy), or (3) any other consent previously granted for a specific purpose concerning Your personal information, send an email to the PRWS Data Controller at aj@coastnetworx.com.

REVIEW/CHANGE CONTACT INFORMATION

Requests to review or change Registration Information previously provided on or through certain portions of the Online Services may be made to the PRWS by sending an email to the PRWS Data Controller at aj@coastnetworx.com.

LINKED SITES

PRWS may provide links to third parties' Web sites ("Linked Sites") from the Portal or the Online Services. Linked Sites are not necessarily reviewed, controlled or examined by PRWS in any way and PRWS is not responsible for the privacy policies and practices of any such Linked Sites, or any additional links contained therein. These links do not imply PRWS's endorsement of or association with the Linked Sites.

DISCLOSURE PURSUANT TO LAW

PRWS may make information concerning Visitors, the Portal, the Online Services, and the uses thereof, available to law enforcement personnel and agencies as required by law or in order to enforce the Terms of Use, and may disclose such information if required by law or a judicial or governmental order or subpoena. Where permitted by law, PRWS may also disclose such information to law enforcement personnel and agencies, or use such information as part of legal process, in order to protect its property or in furtherance of an investigation regarding a breach of the Online Services rules and policies or any unauthorized access to or use of the Portal or the Online Services, or any illegal activities concerning a particular visitor or registered visitor.

CONSENT TO PROCESSING

By using or providing information to the Portal or the Online Services, all Visitors understand and unambiguously consent to the collection, processing and use of such information in the United States and other countries and territories, for the purposes of providing the Portal, the Online Services and related services and as otherwise set forth herein or in the PRWS Rules.

SERVICE PROVIDERS

PRWS may utilize third parties to provide or perform certain services and functions on the Portal and the Online Services. For example, PRWS may use a Web site tracking evaluation firm to analyze use of the Portal and the Online Services by all visitors and PRWS may use third-party suppliers to provide certain functionality and services provided on the Online Services. PRWS will make information concerning Visitors and their use of the Portal and Online Services available to these service providers and business partners, as necessary, to perform these functions and services. The service providers may be located throughout the world; therefore information relating to Visitors may be sent worldwide to countries which have a level of privacy protection different to that of the U.S. or the country of residence of such visitor.

TRANSFER OF INFORMATION

In the event of a sale, merger, consolidation, reorganization, liquidation, dissolution, change of control or sale or transfer of the substantial assets of PRWS, information collected via or stored on the Portal or the Online Services may be sold, assigned or transferred to a party acquiring all or substantially all of the equity and/or assets of PRWS related to the Portal. PRWS may also transfer such information to its subsidiaries and affiliates involved in the operation of the Portal or the Online Services.

SECURITY

PRWS takes seriously the security of your personal information. PRWS has therefore implemented technology and security policies and procedures intended to reduce the risk of accidental destruction or loss, or the unauthorized disclosure of or access to, such information, reasonably appropriate to the level of the data concerned. However, due to the open communication nature of the Internet, we cannot guarantee that communications between You and the Portal, and the Portal and You, or data stored on PRWS's systems, will be free from unauthorized access by third parties.

In the unlikely event that PRWS believes that the security of your personal information in PRWS's possession or control may have been compromised, PRWS may seek to notify you of that development. If a notification is appropriate, PRWS would endeavor to do so as promptly as possible under the circumstances, and, to the extent PRWS has your email address, PRWS may notify you by email.

UPDATES TO THE PRIVACY POLICY

PRWS may, in its sole discretion, update this Policy at any time and from time to time, by posting the amended Policy on the Portal. The revised or amended Policy shall be effective upon posting. Any access to or use of the Portal or Online Services following such update shall be deemed consent to such update. All visitors are therefore encouraged to refer back to this page regularly. This Policy may not be otherwise amended without the written consent of PRWS.

CONTACT, QUESTIONS, & COMMENTS

If you would like to communicate with PRWS regarding privacy issues or have questions or comments about this Policy, please forward such communication to aj@coastnetworx.com.