Welcome to the Grgich Hills Estate website, www.grgich.com (the "Site"), operated by Grgich Hills Estate ("we", "us" or "our"). Your privacy is important to us so we provide this notice explaining our privacy practices and the choices you can make about the ways in which information about you is collected and used from the Site.

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 this Privacy Policy. This policy may change from time to time (see Updates to our Privacy Policy). 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.

Our Site is not intended for users who are under 21 years of age. No one under age 21 may provide any information to the Site. We do not knowingly collect personal information from anyone under the age of 21. If you are under 21, do not use or provide any information on this Site. If we learn we have collected or received personal information from anyone under 21, we will delete that information. If you believe we might have any information from or about anyone under 21, please contact us at: 707-963-2784; info@grgich.com, or Grgich Hills Estate, P.O. Box 450, Rutherford, CA 94573.

Information We Collect

When you create an account, we ask for your name, address, phone number, email address, and a user name and password. We use this information to fulfill your orders and to enable time-saving features like express checkout, wish lists, and saved baskets. We do not share or sell this information, except as may be disclosed under Disclosure of Your Information.

Your Information

We do not share, sell or trade email addresses, information collected as part of a survey, or specific details about you or your household.

We do not contribute to or participate in shared or cooperative databases, which give other companies access to your personal information. We do not release credit card or financial information for use by other companies.

For both privacy and security purposes, all transactional information communicated between customers and our Site is transmitted in an encrypted format, and all credit card information is deleted from our servers immediately after card authorization.

As you navigate through and interact with our Site, 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 Site, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Site.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information, but we may maintain it or associate it with personal information we collect in other ways. It helps us to improve our Site and to deliver a better and more personalized service, including by enabling 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.

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

- <u>Cookies (or browser cookies)</u>. 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 Site. 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 Site.
- <u>Web Beacons</u>. Pages of our Site and our emails 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).

Disclosure of Your Information

We may disclose aggregated information about our users without restriction.

We may disclose personal information that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business[and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- 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 the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Returns & Replacements

At Grgich Hills Estate we have a 100% customer satisfaction guarantee. Please notify us within ten (10) days of your shipment's delivery if any issues occur. Upon notification, we will gladly replace any damaged or defective product with the same product. If that product is no longer available, we will gladly replace it with a similar product or refund your payment.

Newsletter

We ask you to provide a name, email address and profile information. We use this information only to fulfill your request and, in the case of profile information, to help make sure we're sending you the type of email updates you want to receive. We do not buy, share or sell email addresses.

SMS

If you opt in to SMS communications, the Site uses cookies to help keep track of items you put into your shopping cart including when you have abandoned your cart and this information is used to determine when to send cart reminder messages via SMS.

Under no circumstances will we sell or share your name, mobile telephone number, or other personal information with third-parties or affiliates for marketing or promotional purposes. Under no circumstances will we purchase or use your name and mobile telephone number collected from third parties. You can cancel the SMS service at any time. Just text "STOP" to the number or short code that sent you the message. After you send the SMS message "STOP" to us, we will send you an SMS message to confirm that you have been unsubscribed. After this, you will no longer receive SMS messages from us. If you want to join again, just sign up as you did the first time, and we will start sending SMS messages to you again. Carriers are not liable for delayed or undelivered messages. You will receive messages with info, promotions, and offers to the number(s) you have provided, including use of an automated system. Message frequency varies. As always, message and data rates may apply for any messages sent to you from us and to us from you. If you have any questions about your text plan or data plan, it is best to contact your wireless provider.

Gift Cards and Gift Messages

These options allow you to send a personal greeting with your gift order. We make no use of the information contained in these greetings except to complete your order as you have requested.

Your Choices

If you would like to opt out of future communications and/or promotional materials from us, you may indicate this preference by following the unsubscribe instructions at the bottom of our e-mails or by contacting us via e-mail, online, or by phone.

Links to Other Sites

Our Site may contain links to other sites that are not operated by us. These sites operate independently of us and have established their own privacy and security policies. For the best online experience, we strongly encourage you to review these policies at any site you visit.

Our Commitment to Data Security

We have put in place physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access to, maintain security of, and correctly use the information we collect. Personally identifiable information and account activity are also protected through the use of e-mail addresses and passwords. In order to maintain the security of your information, you should protect the confidentiality of such information used to log into your account. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and cannot be responsible for the theft, destruction, or inadvertent disclosure of your personal information.

How You Can Access and Update Information

If you have previously provided any personally identifiable information to us by way of our Site, you retain the right to review, correct, update, delete or otherwise modify such information.

To access the personally identifiable information that we have collected about you that we maintain, or to correct factual errors in such information, simply log into your account using your e-mail address and password to update your information. Or you may also contact us at our address below.

To protect your privacy and security, we will take reasonable steps to help verify your identity before granting access or making corrections.

Updates to our Privacy Policy

From time to time, we reserve the right to make updates to this Privacy Policy without prior notice to you. We encourage you to periodically check back and review this Privacy Policy so that you always will know what information we collect, how we use it, and to whom we disclose it. Your continued use of the Site following any changes to this Privacy Policy will be deemed to constitute your acceptance of such change.

How to Contact Us

For questions, comments or assistance, please contact us at: 707-963-2784

info@grgich.com

Grgich Hills Estate P.O. Box 450 Rutherford, CA 94573

PRIVACY NOTICE TO CALIFORNIA RESIDENTS

This supplemental privacy notice applies to California residents (herein referred to as "you," "the consumer," or "California residents") in order to comply with the California Consumer Privacy Act of 2018 ("CCPA"), the Consumer Privacy Rights Act of 2020 ("CPRA"), and other California privacy laws.

If you are an employee or job applicant of the Company, please see the CCPA/CPRA Notice to Employees/Job Applicants that is available at this link and is posted in the breakroom for information that is more specific to you and for notice of the categories of information we have collected about our employees and job applicants over the past 12 months.

Consumer Rights Under the CCPA and CPRA

The CCPA and CPRA establish several rights for you, the consumer. We do not sell your personal information.

You have the right to submit several requests regarding the personal information we have collected about you. You may make such a request for disclosure or deletion of personal information twice within any given 12-month period. We will provide responsive information for a period of 12 months preceding the date of your request. We will provide this information to you within a period of 45 days from the date of your request. If needed, we may require up to an additional 45 days to complete the request but will provide notice to you of the need for the additional time prior to the expiration of the initial 45-day period.

In order to respond to your request, we will need to obtain enough information from you to verify that yours is a valid and legitimate request. This provides further protection for your personal information.

Right to Request Disclosure of Sensitive and Personal Information

You may request that we disclose the categories of sensitive and personal information that we have collected about you, the specific pieces of sensitive and personal information that we have collected about you, or both.

Right to Correct Inaccurate Personal Information

In the event that any of the personal information we maintain about you is incorrect, you have the right to request that we correct it.

Right to Limit Use and Disclosure of Sensitive Personal Information

You may request that we limit the use and disclosure of your sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, and other specific uses delineated in the CCPA and CPRA.

The CCPA and CPRA define "sensitive personal information" as personal information that reveals any of the following:

- A consumer's social security, driver's license, state identification card, or passport number;
- A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
- A consumer's precise geolocation;
- A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership;
- The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication;
- A consumer's genetic data;
- The processing of biometric information for the purpose of uniquely identifying a consumer;
- Personal information collected and analyzed concerning a consumer's health; and
- Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.

Right to Opt-Out

You may request that we stop sharing your personal information for cross-context behavioral advertising. We do not share your information for this purpose, but are simply informing you of this right under the CCPA and CPRA.

Right to Request Deletion of Personal Information

You also have the right to submit a request that we delete the personal information we have collected about you. There are several exceptions to the consumer's right to deletion; namely, we may retain your information despite your request for deletion if we require the information in order to do any of the following:

- Complete the transaction for which the personal information was collected;
- Provide a good or service requested by the consumer or reasonably anticipated within the context of a business's ongoing business relationship with the consumer;
- Otherwise perform a contract between the business and the consumer;
- Detect security incidents and protect against "malicious, deceptive, fraudulent, or illegal activity;"
- Use for internal debugging purposes or to repair software errors;
- Exercise free speech, ensure the right of another consumer to exercise free speech, or any other right provided by law;
- Use the information to comply with the California Electronic Communications Privacy Act;
- Engage in research in the public interest that follows all other privacy laws (with consumer consent);
- Enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business;
- Comply with a legal obligation; or
- Otherwise use the information internally in a lawful manner that is compatible with the context in which the consumer provided the information.

How to Submit a Request

We offer consumers two distinct methods for submitting requests to exercise their rights under the CCPA and CPRA:

- Calling us at (707) 963-2784; or
- E-mail us at accounting@grgich.com.

Submitting a verifiable consumer request does not require that you have an active account with us, nor are you required to create an account. As previously noted, we will need to obtain enough information from you to verify your request in protection of your information before responding to your request. Information that we may need from you to verify your request may include the following:

- Legal name;
- Email address;
- Phone number;
- Date of birth;
- Last four digits of your social security number; and
- Billing address.

We may decline a consumer request if the time and resources that must be expended in order to respond to the request outweigh the reasonably foreseeable impact to the consumer from not responding, as provided by California law.

Requests by an Authorized Agent

A California resident may use an authorized agent to submit a right to know request or a request to delete. To use an authorized agent to submit such a request, the California resident must provide the agent with written authorization. In addition, the California resident may be required to verify their own identity with us or to authenticate the agent's authorization. We may deny a request from an agent that does not submit proof, including written authorization from the resident, that the agent has been authorized by the California resident to act on their behalf. However, such requirements will not apply where a California resident has provided the authorized agent with power of attorney pursuant to California Probate Code Sections 4000 to 4465.

Right to Not be Discriminated Against for Exercising the Rights to Disclosure or Deletion

We will not discriminate against you for exercising your rights under the CCPA and CPRA. Unless otherwise permitted by the CCPA, the CPRA, or other California law, we will not deny you goods or services, charge you a different rate for goods or services, provide you a different quality of goods or services, or suggest that any aspect of your service will change if you exercise any of your rights enumerated here in this policy.

Categories of Information We Collected About Consumers in the Past 12 Months

We collect personal information about you to enable us to provide goods and services to you, to manage and operate our business, to market our goods and services to you, and to comply with our legal and regulatory obligations.

We have collected the following categories of information about our consumers in the past 12 months. We have not necessarily collected each category about every consumer. Except as otherwise noted, we retain each of the below categories of information for seven years from the date of your last transaction with us for the same reasons that we collect the information: to enable us to provide goods and services to you, to manage and operate our business, to market our goods and services to you, and to comply with our legal and regulatory obligations.

Categories of Information (and Retention Period, if different than indicated above)	Source(s)
Personal identifiers: full name, date of birth	You
Sensitive personal information: credit card information (number, CVC, and expiration date), online account login credentials for your account	You
with us (username and password)	
Non-sensitive personal information: telephone number, mailing address,	You
business name	
Commercial information (e.g., transaction information or purchase	You
history)	
Audio or visual information – this information is generally retained for a	Our security system at the
period of seven days	Grgich Hills Estate winery
Inferences drawn from any of the above categories to create a profile or summary about a consumer's preferences and/or characteristics	You

If you are an employee or job applicant of the Company, please see the CCPA/CPRA Notice to Employees/Job Applicants that is available at this link and is posted in the breakroom for information that

is more specific to you and for notice of the categories of information we have collected about our employees and job applicants over the past 12 months.

Disclosure of Personal Information to Third Parties

The following chart lists the categories of information that we have collected about our consumers over the last 12 months that we have shared with third parties. We do not sell your personal information.

Categories of Information	Categories of Third Parties with Whom Information is Shared	Purpose(s) for Sharing the Information
Personal identifiers: full name, date of birth	Third parties (including government agencies) if required to do so by law, regulation, or court order	To comply with our legal obligations and respond to governmental and/or law enforcement requests
Sensitive personal information: credit card information (number, CVC, and expiration date), online account login credentials for your account with us (username and password)	Third-party payment processors, including in connection with transactions where we require credit or debit card information. Third parties (including government agencies) if required to do so by law, regulation, or court order	To facilitate purchases you make with a debit or credit card To comply with our legal obligations and respond to governmental and/or law enforcement requests
Non-sensitive personal information: telephone number, mailing address, business name	Third parties (including government agencies) if required to do so by law, regulation, or court order	To comply with our legal obligations and respond to governmental and/or law enforcement requests
Commercial information (e.g., transaction information or purchase history)	Third parties (including government agencies) if required to do so by law, regulation, or court order	To comply with our legal obligations and respond to governmental and/or law enforcement requests

We Do Not Sell Your Personal Information

We do not sell your personal information. However, in the event that we are considering a sale, partial or complete, asset transfer, partial or complete, or other financing matter, we would make any and all necessary disclosures to you before certain information we possess concerning you may be accessed, disclosed, and/or processed by third parties. Such third party access would be governed by a written agreement that limits such access, disclosure, and processing in accordance with the CCPA, CPRA, and other applicable law.

Our Right to Change Privacy Policy

The foregoing policy is effective as of [DATE]. We reserve the right to change this policy at any time by notifying visitors to our Site of the existence and location of the new or revised privacy policy. Changes to the policy will be posted to this page, and if changes are significant, a summary of the changes will be posted at the beginning of the policy. By entering our Site and by continuing to use our services, you are accepting all terms and conditions outlined in the above Privacy Policy.

If you have any questions about this policy, you may contact us at 707-963-2784.