NEPTUNE SCHOOL OF WINE

PRIVACY POLICY

This Privacy Policy (the "Policy") tells you how Neptune School of Wine uses personal information collected on our web site, www.neptunewine.com (the "Site"). "Users", "you" or "your" refers to any person accessing, browsing, or otherwise using the Site, either manually or via an automated device or program. By using the Site, each User consents to the collection, use, processing and disclosure of personally identifiable User information ("Information") pursuant to the terms set forth below.

Collection and Sharing of Information

We collect Information including names, email addresses and other information required to initiate and complete correspondence and transactions using services or programs available on our Site, and any other information voluntarily submitted by our Users.

We will share Information with our UK affiliate in order to process registrations. Please refer to <u>www.WSETglobal.com</u> to read about our UK affiliate's privacy practices. We will also share specific Information with technical consultants in order to improve your browsing experience, and we will share information with trusted third parties in order to service you (such as, for example, credit companies for the purpose of processing your payment). When required, we may disclose specific Information upon governmental request, in response to a court order, or when required by law to do so. We may also share Information with companies assisting in fraud protection or investigation.

Use of Information

Neptune School of Wine will use Information in ways that are compatible with the purpose for which it was collected or as otherwise authorized by Users, including the following:

- To personalize your experience;
- To alert you of upcoming courses that may be of interest to you;
- To improve customer service; and
- To process transactions (please note that your Information will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the product or service requested and as expressly set forth herein).

Cookies/Tracking

We do not use cookies, and we do not track user browser details through any other means.

Data Security

To prevent unauthorized access, maintain data accuracy, and facilitate the correct use of Information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the Information we collect online. Only authorized employees, agents and contractors (who have agreed to keep Information secure and confidential) have access to this Information. Unfortunately, however, no data transmission over the Internet can be guaranteed to be secure. As a result, we cannot guarantee or warrant the security of any Information you transmit to or from our Site, and you do so at your own risk.

Third Party Products, Services and Links

Occasionally, at our discretion, we may include or offer third party products or services on our Site. These third party websites have separate and independent privacy policies, and we have no responsibility or liability for the content and activities of these linked websites. To the extent that you disclose your information to third parties, whether they are service providers, advertisers or other websites throughout the Internet, different rules may apply to their use or disclosure of the personally identifiable information you disclose to them, and you are subject to the privacy customs and policies of that third party. We do not make any representations or warranties as to how such third parties may use your information. Nonetheless, we seek to protect the integrity of our Site and welcome any feedback about these websites.

Children's Privacy

This Site is not directed toward individuals under 13 years of age and we do not knowingly collect personal Information from anyone under the age of 13. To respect the privacy of children and to comply with the Children's Online Privacy Protection Act, children under the age of 13 should not provide any personal Information on this Site. We ask that parents supervise their children while online.

California Privacy Rights

California law permits residents of California to request certain details about what personal information a company shares with third parties for the third parties' direct marketing purposes, and also to request cessation of these practices with regard to their personal information. Neptune School of Wine does not share Users' information with third parties for the third parties' own and independent direct marketing purposes unless we receive your permission.

Users who are California residents and are able to verify their identity to us have the right to:

- Disclosure of the categories and specific pieces of personal information collected about them by Neptune School of Wine, as well as the source of that information and business purpose for collecting the information;
- The categories of third parties with whom this information is shared; and
- Deletion of this personal information.

If you have questions about our sharing practices or your rights under California law, please contact us as described below.

Changes To Our Privacy Policy

As the Site evolves, we may revise this Policy from time to time. If we decide to change our Policy, we will post the revised Policy here. If we make a significant or material change in the way we use your personal Information, registered Users of the Site may be notified via email. Please note that our rights to use your Information will be based on the Policy in effect at the time the Information is used.

Contact Us

If you have any questions, concerns, or comments about our Policy you may contact us using the information below:

By e-mail: <u>info@neptunewine.com</u>; or

By mail: Att'n: Admin Neptune School of Wine 3190-A Airport Loop Drive Costa Mesa, CA 92626