

## PRIVACY POLICY

Beluga Epicure along with its parents, subsidiaries, and affiliates (collectively, the “Company”) is committed to safeguarding your privacy. As used throughout this website, the term “Company” and such terms such as the “legal entity,” “the corporation,” “our,” “we” and “us” may refer to Beluga Epicure or one or more or all of Beluga Epicure’s parents, subsidiaries, and affiliates. All of these terms are used for convenience only and are not intended as a precise designation of any of the separate companies, each of which manages its own affairs.

We ask that you carefully review this Privacy Policy, as it applies to all information the Company collects from and about you, whether in writing, verbally, or electronically, including when you access and use all or part of any website (“Site”) operated by the Company. This Privacy Policy explains how the Company (1) may use and disclose such information; (2) share that information; and (3) your options to control how the Company may use some of your information. For individuals located in the European Economic Area (“EEA”), the Company is the data controller responsible for your personal data collected from your use of the Site.

When you use the Site, you agree to allow us to collect, use, and share your information, as we describe in this Privacy Policy. You also agree to the Company Terms of Use, which are incorporated by reference. If you do not agree, please do not access or use the Site.

### **QUICK GUIDE TO CONTENTS**

1. INFORMATION WE COLLECT
2. INFORMATION USE
3. INFORMATION WE SHARE
4. HOW LONG YOUR INFORMATION IS RETAINED
5. YOUR RIGHTS
6. LINKS
7. CHILDREN’S PRIVACY
8. DATA SECURITY
9. INTERNATIONAL TRANSFERS
10. REVISIONS TO THIS PRIVACY POLICY
11. HOW TO CONTACT US

#### **1. INFORMATION WE COLLECT**

There are several ways we may obtain information about you, including through (A) information you provide to us directly; (B) information we automatically collect. This includes data that identifies you personally, whether directly (i.e., your name) or indirectly (i.e., information about your online use).

##### ***A) Information You Provide***

the Company collects certain information from you when you directly provide it to us. This may include when you create an account with us, make a purchase through our Site, request information from us, sign up for newsletters or our e-mail list, enter into sweepstakes or other promotions, request customer support, or otherwise communicate with or contact us directly. This information may include the following:

- Contact details including your name, address, email address, and telephone or mobile number;
- Login and account information, including username, password, and unique user ID; and
- Billing and payment data, including credit card data; and

- Personal preferences, such as marketing preferences.

### ***B) Information Automatically Collected***

Whenever you visit or interact with the Site, the Company, as well as third-party service providers, may use cookies, web beacons, pixel tags, log files, or other technologies to automatically or passively collect information about your online activity. For information about our use of cookies and other similar technologies through the Site, you can read our Cookie Policy.

Please note that the Company or our service providers may automatically collect the following information about you:

- ***Computer or Device Information:*** We may automatically collect your Internet Protocol (“IP”) address or other unique identifier or information from the computer, mobile device, tablet or other device you use to access the Site, including, but not limited to, your browser type, device type, operating system, software version, phone model, phone operating system, and the domain name from which you accessed the Site.
- ***Usage Information.*** We may collect information about how you use the Site, including: the date and time you visit the Site; what areas or pages of the Site you visit; the amount of time you spend visiting the Site; the number of times you return to the Site; other information about where you click on the Site; whether you open, forward, or click on links in emails we send; and any other Site you may visit.
- ***Location Information.*** We collect general information about where traffic and purchases on our site are coming from around the world. We use this information at an aggregate level (meaning the information does not identify individual users) to create reports to better understand how we engage with users.
- ***Service Providers.*** We may use service providers to support our Site. Some of these service providers may use technology such as cookies, web beacons, pixel tags, log files, Flash cookies, or HTML5 cookies to receive, collect, and store information.
- ***Google Analytics.*** When you visit or interact with the Site, Google Analytics, our third-party analytics solution, may use cookies or other technologies to automatically or passively collect information about your online activity. Google Analytics collects information that your web browser automatically sends to Google, such as the web address of the page that you visit and your IP address. Google uses this information to provide us with reports about traffic to our Site and your visit to our Site (such as the domain you use to access the internet, the web address of the website from which you linked to our Site, the time and date of your visit the web pages that you view and click through). We use this data to improve our Site structure and content. Google may also use this data in accordance with its Privacy Policy, available at <http://www.google.com/privacy.html>. For more detailed information on how Google uses your data through our Site, please visit <http://www.google.com/policies/privacy/partners/>. If you do not wish for our service providers to use cookies or other technologies to automatically or passively collect information about your on-line activity, you should adjust your device or Internet browser to limit such tracking. You may also manage your own Do Not Track settings by clicking here: Cookies Settings.

### ***C. Combination of Information***

We may combine the information we receive from and about you, including information you provide to us, information we automatically collect through our Sites, information collected offline, information collected across other computers or devices that you may use, and information from third party sources.

## 2. INFORMATION USE

the Company may use the information we collect from and about you for a variety of business purposes. These include to respond to your customer service requests, to improve customer experience and engagement, and to enhance or improve our content, products, and services. We are committed to protecting and maintaining the privacy of your information. Therefore, we will process your data only in accordance with applicable data protection law and this Privacy Policy. Where necessary under applicable law, we will have a lawful basis to process your data if:

- You have consented to such processing;
- We have a legitimate interest for processing your data – *e.g.*, for data analytics purposes; fraud prevention; direct marketing; network and information systems security; enhancing or improving our content, products, and services; identifying usage trends; and determining the effectiveness of promotional campaigns; and/or
- We are legally obligated to process it.

We may use the information we collect from and about you to:

- Respond to your inquiries and contact you when necessary;
- Enhance your online experience, including as a way to recognize you and welcome you to the Site;
- Review the usage and operations of our Site, develop new products or services, and conduct analysis to enhance or improve our content, products, and services;
- Provide you with customized content, targeted offers, and advertising on the Site, via email, text message or push notification, or across other websites or social media;
- Administer any orders that you have placed with us and process payments;
- Communicate with you about your purchase;
- Register and manage your account(s) with us;
- Contact you with information, newsletters, and promotional materials;
- Use your data in an aggregated non-specific format for analytical and demographic purposes (this processing may involve profiling – for example to create audiences based on demographic or location-based information for marketing and customization purposes);
- Address problems with the Site or our business, and to protect the security or integrity of the Site and our business; or
- For other purposes disclosed at the time you provide your information or otherwise with your consent.

Additionally, if you use the Site to connect with any third-party services (e.g., social media Site), you authorize us to use information from and about you, on your behalf, to interact with these third-party services based on your requests.

## 3. INFORMATION WE SHARE

### *A) Information You Share*

The Site offer many ways to find, enjoy, and share content. Your activity in connection with the Site may include filling out surveys, reviewing and rating products, inquiring about or purchasing products, participating in online communities, “liking” or “sharing” our content on your social media accounts or otherwise interacting with the Company. Any information you may disclose on our Site, in blogs, on message boards, in chat rooms, or in other public areas of the Site or other third-party websites, applications, or services that the Site may link to, becomes public information. Please exercise caution when disclosing personal information in these public areas.

## ***B) Information We Share***

We may share your personal information with:

***-Affiliates:*** We may share your information with the Company affiliates and subsidiaries for business, operational, promotional, and marketing purposes.

***-Service Providers:*** We may share your information with service providers that provide business, professional or technical support functions for us, help us operate our business and the Site, or administer activities on our behalf.

***-Sweepstakes, Contests, and Promotions:*** If you choose to enter into one of our sweepstakes, contests, or other promotions (a “Promotion”) we may disclose your information to third parties or the public in connection with administering the Promotion, as required by law, as otherwise permitted by the Promotion’s official rules, or otherwise in accordance with the terms of this Privacy Policy

***-Legal Obligations; Safety:*** We may access and disclose your information to respond to subpoenas, judicial processes, or government requests and investigations, or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law. We may disclose your information to protect the security of our Site, servers, network systems, and databases. We also may disclose your information as necessary, if we believe that there has been a violation of our Terms of Use, any other legal document or contract related to our services, or the rights of any third party.

***-Sale or Transfer of Business or Assets:*** We may sell or purchase assets during the normal course of our business. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information may be considered an asset of ours and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to try to require that the transferee use personal information provided through this Site in a manner that is consistent with this Privacy Policy.

***-Aggregate or Anonymous Non-Personal Information:*** We may also share aggregate, anonymous, or de-identified non-personal information with third parties for their marketing or analytics uses.

***-Other:*** We also may share your information as disclosed to you at the time of collection.

### **4. HOW LONG YOUR INFORMATION IS RETAINED**

We will retain your individual personal data only as long as we need it for the purpose for which we are processing it. For example, when you contact us with a complaint, query, or other concern, we will retain your information for as long as needed to respond to your query. We may use data aggregated by Google Analytics indefinitely without further notice to you.

We will periodically review the personal information we hold and delete it securely, or in some cases anonymize it, when there is no longer a legal, business, or consumer need for us to retain it. When we anonymize data, we may retain such data indefinitely without further notice to you.

### **5. YOUR RIGHTS**

#### ***A) For EEA Residents***

We respect your privacy rights and provide you with reasonable access and rights to the personal data (as defined in the General Data Protection Regulation) that you may have shared with us. If

you live in the EEA, and wish to access, amend, delete, or transfer any personal data we hold about you, you may contact us as set forth in the “Contact Us” section.

At any time, you may object to the processing of your Personal Data on legitimate grounds, but we reserve the right to proceed with the processing if otherwise permitted by applicable law. If you believe we have infringed upon your right to privacy granted by applicable data protection laws, please contact [info@belugagroup.ru](mailto:info@belugagroup.ru). You also have a right to lodge a complaint with data protection authorities.

***B) For California Residents***

California law permits residents of California to request certain details about how the Company shares their personal information with third parties or affiliated companies for direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at [info@belugagroup.ru](mailto:info@belugagroup.ru). You must put the statement “Your California Privacy Rights” in the subject line. We are not responsible for notices that are not properly sent, or that do not have complete information.

California residents may also take advantage of the following rights:

-You may request, up to two times each year, that we disclose to you: (1) the categories and specific pieces of personal information that we have collected about you; (2) the categories of sources from which we collect your personal information; (3) the business or commercial purpose for collecting your personal information; (4) the categories of third parties with whom we have shared your personal information; and (5) the business or commercial purpose for selling your personal information, if applicable.

-You may also request that we delete any personal information we have collected from or about you. There are some reasons we will not be able to fully address your request, such as if we need to complete a transaction for you, to detect and protect against fraudulent and illegal activity, to exercise our rights, or to comply with a legal obligation.

We offer multiple ways for you to make such a request (“Data Access Request” and “Deletion Request”) free of charge, including the following:

-Send an e-mail to [info@belugagroup.ru](mailto:info@belugagroup.ru). You must put the statement “Your California Privacy Rights” in the subject field and include as an attachment a completed Data Access Request Form or Deletion Request Line in free form. We are not responsible for requests that are not labeled or sent properly, or that do not have complete information.

In order for us to fulfill your Data Access Request Form or Deletion Request Form, we will need to verify that you are who you say you are and that we indeed collect or retain your personal information on our systems. For verification purposes, we will attempt to match information that you provide to us with information we already have in our records. We will not be able to delete or provide you with access to your personal information unless we are able to verify your identity. We will respond to your request within 45 days of receiving your request, after proper verification, unless we need additional time, in which case we will let you know. We value your privacy and will not discriminate against you in response to you exercising your privacy rights.

An authorized agent may submit a request on your behalf, after submission of proof of authorization in accordance with California law.

For purposes of compliance with the California Consumer Privacy Act, in addition to the further details as described throughout this Privacy Policy, we make the following disclosures:

-We collect the following categories of personal information: *identifiers/contact Information, commercial information, internet or other electronic network activity information, geolocation, visual and audio information, age, gender, and inferences drawn from the above.*

-We disclose the following categories of information for a business purpose: *identifiers/contact information, commercial information, internet or other electronic network activity information, geolocation, visual and audio information, and inferences drawn from the above.*

### **C) Cookies; Tracking**

Certain parts of our Site require cookies. You are free to adjust your device or Internet browser settings to limit certain tracking or to decline cookies. Please refer to your device's settings or your Internet browser's "Help" section for more information on how to delete and/or disable your device or browser from receiving cookies or controlling your tracking preferences. Our system may not respond to Do Not Track requests or headers from some or all Internet browsers. For more information about how we collect and use cookies, and how you can control how we use certain cookies, see our Cookie Policy below.

### **D) Choices Concerning Direct Marketing**

If you consented to receive direct marketing from the Company, we provide you with the opportunity to opt-out of marketing communications. To unsubscribe from our email communications at any time follow the instructions contained within the email you received, or contact us using the information in the "How to Contact Us" section below.

## **6. LINKS**

The Sites may have links to third-party websites, which may have privacy policies that differ from our own. We are not responsible for the practices of such sites.

## **7. CHILDREN'S PRIVACY**

Protecting children's privacy is important to us. We do not direct the Sites to, nor do we knowingly collect any personal information from children under the age of thirteen (or older, if applicable law provides for different protections). If we learn that a minor has provided personal information through the Sites, we will use reasonable efforts to remove such information from our files.

We do not sell personal information about people under the age for 16.

## **8. DATA SECURITY**

We have taken certain physical, administrative, and technical steps to safeguard the information we collect from and about our customers and visitors to the Sites. While we make every effort to help ensure the integrity and security of our network and systems, we cannot guarantee our security measures.

## **9. INTERNATIONAL TRANSFERS**

Since the Company is a global company, Site covered by this policy attract users from all over the world. the Company is based in the United States. Therefore, if you choose to give us personal information, we will process that information in the United States. Data protection laws in the United States may be less stringent than in your country.

To ensure that we adequately protect your data, we only transfer your data subject to suitable safeguards being in place. In particular, we transfer your information outside the EEA through the use of standard contractual clauses and we make sure that any such transfers are conducted in accordance with applicable laws and using adequate and appropriate safeguards. To find out more about how we safeguard your information (including obtaining a copy of such safeguards) in relation to transfers outside the EEA, please contact us via the details provided in the "How to Contact Us" section below.

## **10. REVISIONS TO THIS PRIVACY POLICY**

We reserve the right, at our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Privacy Policy at any time. When we do, we will post the change(s) on the Sites.

Your continued use of the Sites following the posting of changes to these terms means you accept these changes. If we change the Privacy Policy in a material way, we will provide appropriate notice to you.

#### **11. HOW TO CONTACT US**

If you have any questions or concerns about this Privacy Policy or the practices described herein, please contact our Privacy Officer at:

Attention: Privacy Officer

[info@belugagroup.ru](mailto:info@belugagroup.ru)