

Cellar Privacy Policy:

Welcome to Cellar! Our commitment is to respect and protect your privacy. This This Cellar Privacy Policy ("Privacy Policy") describes how we collect, use, and disclose information about you when you access or use Cellar's digital platforms and services, including:

- (a) websites, portals, mobile applications, channels, and software, including www.cellarco.ai, social media pages and channels (collectively, the "Websites"); and
- (b) any services, features, media, functions, content, tools, and links contained or offered in the Websites (collectively, the "Services").

We may make changes to this Privacy Policy from time to time. We may also post privacy policies or statements on Websites or Services where those additional policies apply. When we make changes to this Privacy Policy, we will do our best to notify you by:

- (i) sending an e-mail to the e-mail address you most recently provided; or
- (ii) sending a push notification or in-app notification; or
- (iii) prominently posting a notice of the changes on those Websites.

We respect the privacy of your personal information when using the Cellar's Websites and Services. You also have certain rights with respect to your information, as explained further below in the Privacy Policy.

Information We Collect And How We Use It

Information We Collect

We collect certain types of information in order to better provide our Websites and Services to all of our users. The types of information we may collect, and how that information is used, depend on how you use our Websites and Services.

Account Information: If you create an account on any of the Websites or Services (a "User Account"), you may submit your full name, e-mail address, home address, phone number, zip code, gender, a profile bio, and birth date. Some users may also submit their means of age verification (e.g., driver's license) or working certification, or work badge displaying your place of employment. We use this information to facilitate the creation and continued security of your User Account and to assist in facilitating transactions that you initiate through the Websites and Services. We also use it to identify you as a user in our system based on a legitimate interest in

providing, personalizing, and improving the Services for an optimal user experience. See below for more on Managing and Deleting Your Information.

Public Content: The information that you contribute or post on the Websites or Services is intended for public consumption, including your reviews, tips, photos, videos, check-ins, comments, likes, posts, events, bookmarks, friends, lists, compliments, and User Account name and profile photo.

Communications: When you sign up for a User Account or use certain features, you can opt-in to receive social, transactional, marketing, or administrative messaging from other Cellar users, businesses, and Cellar itself. You may also exchange messages with Cellar administrators, or other users.

Messages that you exchange through the Websites or Services are saved. If you send or receive messages through the Websites or Services via SMS text message, we may log phone numbers, phone carriers, and the date and time that the messages were processed. We may also store the information that you provide when you communicate with us, including phone calls, letters, e-mails, and other electronic messages, or in person.

This information is largely used to process and deliver those messages, based on our legitimate interest in facilitating communications and responding to you for things like customer support. We also use it to send newsletters, surveys, offers, and other promotional materials. You may always opt out of our direct marketing e-mails by following the instructions contained within our promotional e-mails or, in some cases, by logging into your User Account and changing your communication preferences.

Transactional Information: If you initiate a transaction through any of our Websites or Services (the "Transactable Sites"), you may submit personal information such as your name, telephone number, billing address, shipping address, and e-mail address.

To most efficiently serve you when transacting through our Transactable Sites, payment transactions and order fulfillment are handled by established third-party banking managers, processing agents, and distribution institutions. They receive only the information required to verify and any payment to you.

Activity: We may collect information about you through your use of our Websites and Services, including geographic location, IP address, browser type, domain name, the website that led you to the Websites, the website to which you go after leaving the Websites, the dates and times you access the Websites, device ID, and activities within our Websites or Services.

We do this to customize the advertising you view and to recommend content based on our legitimate interest in advertising our Websites and Services. We also do this to provide user base demographics to our listing providers in order to help connect you to those business and facilitate your transactions with them.

Further, we may collect certain information with the help of cookies and other tracking mechanisms—please see our Cookies section below for more information.

How Cellar Uses Your Information

In addition to the above, we also collect and use information for the following purposes:

To track usage of the Websites and Services, analyze system administration, debug and identify repairs, and back up our systems to allow for disaster recovery, based on our legitimate interest in operating and administering the continued availability of our Services and Websites.

To detect security incidents and protect, investigate, prevent, and potentially take action against possible deceptive, fraudulent, unauthorized, malicious or illegal activities, and to respond to claims that Website content is inauthentic, counterfeit, or otherwise violates the rights of third parties, based on our legitimate interest in promoting the safety and security of the systems and applications used for our Websites and Services and in protecting our rights, your rights, and the rights of others.

To improve, upgrade, and enhance the Websites and Services, based on our legitimate interest in providing you and other users with an optimal user experience.

To enforce our Terms of Use, this Privacy Policy, and any other policies governing your access to or use of any of the Websites or Services.

How Cellar Shares Your Information

We generally do not share your personal information, except in the following limited circumstances:

- We may share your personal information at your direction, including with third parties such as PayPal or other third party banking institutions.
- We may share your information with other third parties who perform legitimate services on our behalf as described in Section 4 below.
- We may disclose your information if we believe doing so is appropriate or necessary to prevent any liability, or fraudulent, abusive, or unlawful uses, or to protect Cellar, our Websites and Services, or any rights, property, or personal safety of Cellar or others.

In the event that Cellar is or may be acquired by or merged with another company or involved in any other business deal (or negotiation of a business deal) involving sale or transfer of all or part of our business or assets, we may transfer or assign your information as part of or in connection with the transaction and such acquirer or merged entity may thereafter utilize your

personal information in accordance with this Privacy Policy. Finally, in the event of insolvency, bankruptcy, or receivership, information may be transferred as a business asset.

We may also share your information with our affiliates as described above for any purpose consistent with this Privacy Policy.

Cookies

We may use cookies, web beacons, tags, scripts, local shared objects such as HTML5, advertising identifiers (including mobile identifiers such as Apple's IDFA or Google's Advertising ID) and similar technology ("Cookies") in connection with your use of the Websites or Services. We may also use third parties, like Google Analytics, to help us process this information.

Cookies collect and transmit information about you, such as your use of the Websites or Services; your browser type, search preferences, IP address; and the date and time of your use. Cookies may have unique identifiers, and reside, among other places, on your computer or mobile device, in e-mails we send to you, and on our web pages.

We may use both session-based and persistent Cookies. Session-based Cookies exist only during one session and disappear from your device when you close your browser or turn off your device. Persistent Cookies remain on your computer or device after you close your browser or turn off your computer.

Managing Cookies: It may be possible to delete, block, or disable Cookies through your device or browser settings, but doing so can affect the functionality of the Websites and Services and may prevent you from accessing certain features. The method for disabling Cookies may vary by device and browser, but can usually be found in preferences or security settings. Please note that disabling a cookie or category of cookies does not delete the cookies from your browser unless manually completed through your browser function.

Third Parties

Third parties may receive information about you as follows:

Advertisers: Cellar does not disclose your personal information to third parties for the purpose of directly marketing their services to you unless you first agree to such disclosure. However, we may allow third-party Cookies to collect the same type of information for the same purposes that Cellar does for itself. In doing so, Cellar adheres to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising.

Service Providers: We may rely on third parties to provide some of the features and services that are available through the Websites or Services, such as communications and hosting services, network security, technical and customer support, tracking and reporting functions, quality assurance testing, payment processing, marketing and promotional features, product listings, and brand management. We may share information from or about you with these third-party providers so that they may, for example, complete your requests.

Aggregate Information: We may share user information in the aggregate with third parties such as advertisers, brand managers, and content distributors. For example, we may disclose the number of users that have been exposed to or clicked on advertisements or certain products available in the Transactable Sites, or the general characteristics of such users. We attempt to anonymize this data wherever possible.

Businesses on Cellar: We may share information from or about you (such as your age and gender, your devices, and your use of the Websites and Services) with third-party businesses listed on the Websites or Services, for example, when engaging with the Websites and Services. Keep in mind that businesses may see your Public Content and receive information about your transactions as defined in Section 2 above, regardless of your settings.

Investigations: We may investigate and disclose information from or about you to third parties like law enforcement if we have a good faith belief that such investigation or disclosure: (i) is reasonably necessary to comply with federal, state, or local legal process and legally binding law enforcement instructions and orders, such as a search warrant, subpoena, statute, judicial proceeding, or other legal process served on us; (ii) is helpful to prevent, investigate, or identify possible wrongdoing in connection with the Websites or Services; or (iii) protects our rights, reputation, property, or that of our users, affiliates, clients, partners, or the public.

Managing And Deleting Your Information

Your Right To Access and Manage Your Information

You have the right to access, review, correct, or update the information you provide to us as part of your registration for a User Account with our Websites or Services.

You can exercise this right and manage your own information by updating your User Account directly or by submitting a Data Request to us pursuant to the section below.

You are responsible for the information you provide to us, and you should maintain the accuracy of the personal information in your User Account so that we can best provide products and services to you.

You may also be able to disallow our use of certain location data through your device or browser settings, for example by disabling “Location Services” for the Cellar application in iOS privacy settings. Please note, however, that disabling Location Services may adversely impact your experience with the functionality of our Website or Services, and enabling such services may be necessary in some cases to allow certain transactions.

Your Right To Delete Your Information

You have the right to delete certain personal information you provide to us as part of your registration for a User Account with our Websites or Services, or that you submit through the Transactable Sites. Keep in mind, we need this information to provide account management and access, and if you choose to delete information, you may not be able to take advantage of certain features of the Websites and Services. Should you choose to delete information, you can exercise this right by submitting a Data Request to us pursuant to the section below. We will never discriminate against you should you choose to exercise these rights.

In some circumstances, we may retain information about you for legitimate business or legal purposes, or for any purposes authorized under this Privacy Policy unless prohibited by law. For example, we may retain information to prevent, investigate, or identify possible wrongdoing in connection with the Websites or Services, or to comply with legal obligations. Some information may persist in a limited internal capacity for internal administration, such as in backup files maintained for data integrity and disaster recovery. We strive to store your information no longer than necessary, and will take steps to delete your information where reasonably possible.

Data Requests

Please note that we take your privacy seriously and therefore take steps to safeguard your personal information, including ensuring an adequate level of data protection in accordance with international standards.

If you are not satisfied with how we have stored or processed your personal information, please contact us pursuant to the section below. If you would like to access, revise, or delete any personal information, please submit a written Data Request by contacting us pursuant to Section 6 below.

We will take such steps as we deem necessary to verify your identity before proceeding with your Data Request. For example, we may ask you for a piece of information held in your records that you might reasonably be expected to know. We cannot disclose personal information pursuant to a Data Request to anyone other than the individual in question. Once any queries around the information requested have been resolved, copies of the information will be sent to you electronically wherever possible or, if this is not technically possible, by mail.

If you submit multiple Data Requests and these Data Requests are excessive or manifestly unfounded, we will charge \$20.00 to cover the administrative costs involved in dealing with each Data Request. In extreme circumstances, we reserve the right to refuse your Data Requests if they are excessive or manifestly unfounded.

We will attempt to respond to proper and confirmed Data Requests within thirty (30) days, or as otherwise required by applicable law.

Your Right To Cancel Or Modify Marketing Communications

You have the right to cancel or modify the e-mail marketing communications you receive from us. You can exercise this right by following the instructions contained within our promotional e-mails or, in some cases, by logging into your User Account and changing your communication preferences. Please note that this will not affect subsequent or different subscriptions—if your opt-out preferences are limited to certain types of e-mails, the opt-out will be so limited.

While you can manage some of your e-mail preferences, please note that you cannot opt out of receiving certain administrative, transactional, or legal messages from Cellar which we may send in the course of legitimate business if you are signed up for a User Account and/or use certain features. However, such announcements can be terminated by asking us to close your User Account.

Contact Information for submitting a Data Request

For any questions related to this Privacy Policy or to submit a Data Request, you may contact us via e-mail at admim@cellarco.ai

Children Using The Websites Or Services

The Websites and Services are intended for adults only and require that users be no less than twenty-one (21) years of age to access and use such Websites and Services. Please check the applicable terms and conditions for such Websites and Services for further information. Individuals under the age of twenty-one (21) are prohibited from creating a User Account and profile, or accessing the Websites or Services. If you

become aware that an underage user has created a User Account using false, stolen, or otherwise misleading information, please contact us immediately at customerservice@cellarco.ai.

Security

We have implemented a number of measures to help protect your personal information. These measures include, but are not limited to, minimizing access to personal information to employees with a need to access it. Please note, however, that while we endeavor to keep our security measures up-to-date, no data security measures can guarantee complete security.

In addition, there are steps you can take to help protect your information, including choosing a robust password for your device and/or account that nobody else knows or can easily guess, and keeping your log-in and password private.

Cellar is not responsible for the actions or activities of unauthorized third parties who compromise our security measures, and so we cannot be responsible for such unauthorized party's access, acquisition, or distribution of your personal information. If you believe your personal information has been compromised, we encourage you to notify us immediately using the contact information above. Please note that we retain some personal information about you in accordance with our record retention policies, as required by law, or as required for the achievement of the purposes of the processing as mentioned above (e.g., to enforce any agreements or provide a product/service).

It is important for you to protect against unauthorized access to your account, password, and computer. Be sure to sign off of your account when finished, especially if you are using a shared computer. You can learn more about steps you can take to protect your personal information at:

<https://www.consumer.ftc.gov/articles/0272-how-keep-your-personal-information-secure>.

CONTACT US

If you have any questions about these Terms, please contact us at the following:

Email: admin@cellarco.ai