

# Privacy Policy

## MIZKAN AMERICA, INC. PRIVACY PRINCIPLES

Mizkan America, Inc. takes privacy seriously. The following four principles underpin our approach to respecting your privacy:

1. We value the trust that you place in us by giving us your personal information. We will always use your personal information in a way that is fair and worthy of that trust.
2. We will provide clear information about how we use your personal information. We shall always be transparent with you about what information we collect, what we do with it, with whom we share it and who you should contact if you have any concerns.
3. We will take all reasonable steps to protect your information from misuse and keep it secure.
4. We will comply with all applicable data protection laws and regulations and we will co-operate with data protection authorities. In the absence of data protection legislation, we will act in accordance with generally accepted principles governing data protection.

## MIZKAN AMERICA, INC. PRIVACY NOTICE

*Last Updated: December 2014*

This Privacy Notice explains the types of personal information we collect and how we use, disclose and protect that information.

### What does this Privacy Notice apply to?

This Privacy Notice applies to personal information collected by Mizkan America, Inc. in connection with the brands we offer (find out more about Mizkan America, Inc. at <http://www.mizkan.com/Corporate.aspx>). This includes information collected offline through our Consumer Support Centers, direct marketing campaigns, sweepstakes and competitions, and online through our websites, applications and branded pages on third-party platforms and applications accessed or used through such websites or third-party platforms (“**Mizkan Americas Sites**”).

This Privacy Notice also applies to targeted Mizkan America, Inc. content, including offers and advertisements for Mizkan America, Inc. products and services, which we (or a service provider acting on our behalf) may send to you on third-party websites, platforms and applications (“**Third-Party Sites**”) based on your Site Usage Information (as defined below). These Third-Party Sites may have their own privacy policies and terms and conditions. We encourage you to read them before using those Third-Party Sites.

This Privacy Notice is hereby incorporated into and forms part of the terms and conditions of use of the applicable Mizkan America, Inc. Site. **See your privacy rights and who to contact below.**

## **Your consent**

By using a Mizkan America, Inc. Site, you are consenting to the relevant Mizkan America, Inc. brand collecting, using and disclosing your personal information in accordance with this Privacy Notice. If you do not agree to the collection, use and disclosure of your personal information in this way, please do not use Mizkan America, Inc. Sites with your personal information.

Mizkan America, Inc. will only collect, use or disclose your personal information where it is fair and lawful to do so. In most cases, we will ask for your consent explicitly but, in some cases, we may infer consent from your actions and behavior. We may ask you to provide additional consent if we need to use your personal information for purposes not covered by this Privacy Notice. You are not obliged to provide such consent but if you decide not to then your participation in certain activities may be restricted. If you provide additional consent, the terms of that consent shall prevail in the event of any conflict with the terms of this Privacy Notice.

Please note, however, that we may process your personal information without consent if we have a legitimate reason to do so, provided that such use will not have a prejudicial effect on your own rights, freedoms and interests. Any such use shall be in accordance with the Mizkan America, Inc. Privacy Principles set out above.

## **What about my child's privacy?**

Websites operated by or on behalf of Mizkan America, Inc. are intended for use by persons age 13 and over. Mizkan America, Inc. does not seek to collect information about children under the age of 13. No information should be submitted to or posted on Mizkan America, Inc.'s websites by users under 13 years of age.

If a child under the age of 13 submits personal information to Mizkan America, Inc.'s website, we delete the information as soon as we discover it was provided by a child under 13 years of age and do not use it for any purpose. Mizkan America, Inc. encourages parents to take an active role in their children's use of the Internet and to inform them of the potential dangers of providing information about themselves over the Internet.

## **What information do we collect?**

In this Privacy Notice, your "personal information" means information or pieces of information that could allow you to be identified. This typically includes information such as your name, address, screen name, profile picture, email address, and telephone number, but can also include other information such as IP address, shopping habits, information about your lifestyle or preferences such as your hobbies and interests. We may collect personal information about you from different sources, including:

1. Information you give us directly
2. Information we collect automatically when you use the Mizkan America, Inc. Sites
3. Information we collect from other sources

## How do we use your personal information?

We use your personal information to:

1. Improve our products and your experience on the Mizkan America, Inc. Sites.
2. To contact you regarding products and services which may be of interest to you, provided you have given us consent to do so or you have previously requested a product or service from us and the communication is relevant or related to that prior request and made within any timeframes established by applicable laws.
3. To provide you with products or services that you request from us.

## Cookies

We use “cookies” on our Sites. A cookie is a piece of data stored on a site visitor’s hard drive to help us improve your access to our site and identify repeat visitors to our site. For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving time while on our Sites. Cookies can also enable us to track and target the interests of our users to enhance the experience on our Sites. Usage of a cookie is in no way linked to any personally identifiable information on our Sites.

## Mobile Message Services

We may make available a service through which you can receive text or other types of messages from Mizkan America, Inc. (such as SMS (short message service), or MMS (multimedia message service), or EMS (enhanced message service)) on your wireless or mobile device (“Mobile Message Service”). If you subscribe to one of our Mobile Message Services, you agree to receive such messages from Mizkan America, Inc. at the address or mobile number you provide for that purpose (unless and until you have elected to opt out of receiving such messages by following the instructions in the **Your privacy rights and who to contact** section below).

You understand that your wireless carrier’s standard rates apply to these messages, and that you may change your mind at any time by following the instructions in the **Your privacy rights and who to contact** section below. If fees are charged to your wireless account invoice, you agree that we may collect from you and provide your carrier with your applicable payment information in connection therewith. You represent that you are the owner or authorized user of the wireless device you use to sign up for the Mobile Message Service, and that you are authorized to approve the applicable charges. In addition to meeting certain age restrictions and any other terms and conditions associated with each Mobile Message Service, you may be required to register personal information such as your name, text message, wireless address or mobile phone number. We may also obtain the date, time and content of your messages in the course of your use of the Mobile Message Service. We will use the information we obtain in connection with our Mobile Message Service in accordance with this Privacy Policy. Please note, however, that your wireless carrier

and other service providers may also collect data about your wireless device usage, and their practices are governed by their own policies.

You acknowledge and agree that the Mobile Message Service is provided via wireless systems which use radios (and other means) to transmit communications over complex networks. We do not guarantee that your use of the Mobile Message Service will be private or secure, and we are not liable to you for any lack of privacy or security you may experience. You are fully responsible for taking precautions and providing security measures best suited for your situation and intended use of the Mobile Message Service. We may also access the content of your wireless and/or mobile phone account with your carrier for the purpose of identifying and resolving technical problems and/or service-related complaints.

## **Who do we share your personal information with?**

Mizkan America, Inc. is an operating unit of Mizkan Americas, Inc., the pre-eminent manufacturer and marketer of specialty vinegars, mustards, cooking wines, marinades, wine reductions, salted spirits, Asian sauces and dressings, and a variety of other liquid condiments. See more at: <http://www.mizkan.com/Corporate.aspx>. Mizkan America, Inc. may share your personal information with the member companies of the Mizkan Group and trusted third-parties based outside the country in which you live so that they may process that data on our behalf.

We may also share your personal information with companies, organizations or individuals outside of Mizkan America, Inc. if we believe that disclosure of the information is necessary for legal reasons.

## **Transferring your personal information**

We may transfer your personal information to servers located outside the country in which you live or to affiliates or other trusted third-parties based in other countries so that they may process personal information on our behalf. By using a Mizkan America, Inc. Site or otherwise providing Mizkan America, Inc. with personal information, you agree to us doing so in accordance with the terms of this Privacy Notice and applicable data protection laws and regulations.

You should be aware that many countries do not afford the same legal protection to personal information as you might enjoy in your country of origin. While your personal information is in another country, it may be accessed by the courts, law enforcement and national security authorities in that country in accordance with its laws. Subject to such lawful access requests, we promise that anyone processing your personal information outside your country of origin is required to implement measures to protect it and is only entitled to process it in accordance with Mizkan America, Inc.'s instructions.

## **Safeguarding your personal information**

We take all reasonable precautions to keep your personal information secure and require any third-parties that handle or process your personal information for us to do the same. Access to your

personal information is restricted to prevent unauthorized access, modification or misuse and is only permitted among our employees and agents on a need-to-know basis.

## **Your privacy rights and who to contact**

If you have any questions, comments or concerns about how we handle your personal information, then you may contact us by clicking the **Contact Us** link on the Mizkan America, Inc. Site that directed you to this Privacy Notice. Your request will be directed to the appropriate Mizkan America, Inc. brand. Alternatively, please go to [www.mizkan.com](http://www.mizkan.com) and click on the **Contact Us** link.

You have the right to tell us if you:

1. Don't want to be contacted in the future by us
2. Would like a copy of the personal information which we hold about you
3. Would like us to correct, update or delete your personal information in our records
4. Wish to report any misuse of your personal information

To assist us in dealing with your request, please provide your full name and details.

## **Changes to our Privacy Notice**

We may change this Privacy Notice from time to time by posting the updated version of the Privacy Policy on the Mizkan America, Inc. Sites. We will give you reasonable notice of any material change. We encourage you to visit frequently to stay informed about how we use your personal information.

## **Other Mizkan America, Inc. privacy notices**

In addition to this Privacy Notice, there may be specific campaigns or promotions which will be governed by additional privacy terms or policies. We encourage you to read these additional terms or policies before participating in any such campaigns or promotions as you will be required to comply with them if you participate. Any additional privacy terms or policies will be made prominently available to you.