

# JUUL Labs, Inc.

## Privacy Policy

**Effective Date: January 1, 2020**

Welcome to our website. JUUL Labs, Inc. (“JUUL Labs”, “us”, or “we”) operate [www.JUUL.com](http://www.JUUL.com), our ecommerce website where you can browse and purchase our products and [www.JUULLabs.com](http://www.JUULLabs.com), our corporate informational website where you can find information about our company including efforts to combat underage use, regulatory and policy issues, and our Track + Trace program where you can report devices confiscated from minors.

This privacy policy (“Privacy Policy” or “Policy”) addresses how information is collected, stored, and utilized by JUUL Labs, whether through one of our websites, [www.Juul.com](http://www.Juul.com) and/or [www.JUULLabs.com](http://www.JUULLabs.com) (individually a “Website” or collectively the “Websites”), any mobile application we may offer in the future which is linked to this Policy (the “App”) (collectively, the “Services”) or offline. By accessing or using our Services, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information, as applicable, as described in this Privacy Policy and the Websites’ respective terms of service (“Terms of Service”).

JUUL Labs reserves the right to change this Privacy Policy. See the section captioned “Changes to this Privacy Policy” below.

### **1. Information Collected at [www.juul.com](http://www.juul.com) and Through our Mobile App**

JUUL Labs holds our customer base in the highest regard and is dedicated to providing the best experience on our Services. In order to offer an enjoyable and premium experience on our ecommerce website, we collect information which can personally identify you (e.g., name, address and email) and information that is about you but that does not identify you individually (e.g., aggregate information on the number and frequency of visits to various pages of the Websites). The categories of information we collect can include the following:

- We may collect personal information that you provide to us directly, such as your name, phone number, location, payment information, and e-mail address when you register on our Websites, purchase a product, sign up for our newsletter mailing list, or otherwise communicate with us (e.g., via customer service). Account creation is required when purchasing products from any e-commerce Websites.
- We may also collect any communications between you and JUUL Labs and any other information you provide to JUUL Labs. If you download and use our mobile App to access the Service, the App does not require you to enter any personally identifiable information, though you may voluntarily provide information to us through the App, for example, when you contact us through the App’s customer service link and provide to us your name, email address and any information you choose to include in the text of your

message. We use this information to operate, maintain, and provide to you the features and functionality of the Websites, as well as to communicate directly with you, such as to send you email messages. We may also send you service-related emails or messages (e.g., account verification, change or updates to features of the Websites, technical and security notices).

## **2. Information Collected at [www.juullabs.com](http://www.juullabs.com)**

JUUL Labs is dedicated to providing quality information regarding our company, our efforts to combat underage use, and regulatory and policy issues affecting our industry. On our corporate site we collect very little information which can personally identify you (e.g., name, address and email) and information that is about you but that does not identify you individually (e.g., information submitted through our Track and Trace program such as a device serial number or the number and frequency of visits to various pages of the corporate website). The categories of information we collect can include the following:

- We may collect personal information that you provide to us directly, such as your name, and e-mail address when you communicate with us (e.g., the “Contact Us” page). Our Track and Trace program collects only a device serial number and an optional email address.
- We use this information to communicate with you, such as to respond to your inquiries and to operate our Track and Trace program to curtail improper use of our products. We may also send you service-related emails or messages (e.g., account verification, change or updates to features of the Websites, technical and security notices).

## **3. Information Automatically Collected on all Online Websites and Apps**

We and our third-party partners, automatically collect certain types of usage information when you visit our Websites, use our Service, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, web beacons, file information and similar technologies (collectively, “Tracking Technologies”). For example, we may collect information such as your domain name, browser type, operating system, IP address, web pages viewed while visiting our site, links clicked, length of time spent on our Service, and reference website from which you accessed the Website.

We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Website and to understand more about the demographics of our users. In gathering this information, we are able to enhance your experience when visiting our Websites (including keeping your preferences and items placed in your shopping cart between visits) and to provide custom, personalized content and information, including targeted content and advertising. These cookies do not contain or track sensitive information such as your payment information. You may set your browser to not accept cookies; however, some features of the Websites may not function properly without the use of cookies. Although we do our best to honor the privacy preferences of our users, we are unable to respond to “Do Not Track” signals set by your browser at this time.

If you download and use a mobile App to access our Service, we automatically collect certain types of information about your device and usage in several ways. When you download and use the App, JUUL Labs will automatically receive certain information, about which JUUL Labs products that are connected to the App, your mobile device and your usage of the App, such as the device operating system and version and information regarding your use of the App, such as the time spent using the App, which features of the App you access and use, and error messages but not specific identifying information about you. JUUL Labs may modify the information that it receives from the App at any time and will provide you notice of such changes by alerting you of a change to the Privacy Policy.

The App may store information regarding usage of a compatible JUUL Labs device that you have linked to the App when the App is running or when a compatible JUUL Labs product is available to pair with the App. Such information may include identification and pairing information to connect with a JUUL Labs product, log files, modes, settings, durations, error rates, and other information that may be useful to enhance the connectivity between a compatible JUUL Labs product and the APP. We do not link this Device Usage information to your personal information in our systems and this information is transmitted in an anonymous form and in an encrypted manner. If you do not opt-in to the Usage Recording Feature, the App will not collect any device usage information. If you do opt-in and choose to save certain settings or save user profiles in a durable, continuing manner for future sessions regardless of JUUL Labs product, this information may be retained by JUUL Labs.

#### **4. Use And Sharing Of Information Collected**

JUUL Labs utilizes information that is collected in various ways. Information collected helps our efforts to advance our customers' and visitors' online experience when visiting our Service. This ranges from improving important communications on our corporate website, fulfilling our public commitment to appropriate use of our products, ensuring accessibility, improving content, customer service, shopping checkout experience on our ecommerce website and overall Service satisfaction. We also use information we collect to assist with product development efforts, response to mandated legal notices, process purchases on the ecommerce website, to provide you with products or services you request from us through the ecommerce website and App, to improve your overall experience with the Services, for internal analytics purposes, to troubleshoot technical difficulties and errors, to notify you about changes to our Services, and in any other way we may describe to you at the time you provide the information.

#### **We may share your personal information with:**

- Third-party vendors, service providers, contractors and agents that perform services on our behalf, as needed to carry out their work for us, which may include identifying and serving advertisements, providing mailing services, providing financial services, web hosting, or providing analytic services. This sharing is only done so when those entities are performing functions solely on our behalf and they are not permitted to store such information except as needed to perform our work or as required by law;
- When you post content to any public area of our Websites, this information may be visible to the public and we may publish this information on our Websites along with

some of your personal information such as your first name, last initial, and state of residence;

- With your consent, to third parties who may send you offers and information about products and services we think you may enjoy; Other companies and brands owned or controlled by JUUL Labs and other companies owned by or under common ownership as JUUL Labs, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way as we can under this Privacy Policy;
- Other parties in connection with a company transaction, such as a merger, corporate restructuring, sale of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third-party, or in the event of a bankruptcy or related or similar proceedings; and
- Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Service or to protect the security or integrity of our Services; and/or (c) to exercise, investigate, or protect the rights, property, or personal safety of JUUL Labs, our visitors, or others.

We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

**Please note:** The products sold on our ecommerce website are highly regulated by various governing agencies. It may become necessary to share the information that we collect with such agencies to comply with laws, a judicial proceeding, court order, or other legal requests.

We also may disclose information that has been collected where we believe it is necessary to investigate, prevent, or take action regarding underage use or purchase of JUUL Products, illegal activities, suspected fraud and/or counterfeit, situations involving potential threats to the safety of any person, violations of our Terms of Service or Privacy Policy, or as evidence in litigation in which JUUL Labs is involved.

## **5. Age Verification**

The products that we sell on our ecommerce Website are highly regulated and age restricted. We are required and committed to preventing sales to anyone under the legal purchasing age. We will only send you marketing materials and information that encourage or facilitate a purchase of our products after you have certified that 1) you are a of legal purchasing age for the product you wish to purchase; 2) that you wish to be added to our mailing list for the purpose of receiving transactional offers and advertising from a tobacco-regulated company; and 3) that you understand that providing false information may constitute a violation of the law.

Before you can make a purchase through our ecommerce website, we will verify your age through a non-affiliated third-party company to perform an age and identify verification check for adherence to this requirement. We utilize these trusted verification services to verify the information that you provide and ensure that you qualify to access and purchase products from the Website. This process has been developed with the customer's privacy in mind with detailed information neither shared nor accessible.

In some cases, we may not be able to verify your age and/or identity through a verification service. If we are unable to verify your age with the requested information, we require that you verify your identity through a third-party service called Berbix. Before proceeding, however, we will seek your agreement and consent via a dialogue box that will appear on our JUUL Website. Berbix will: collect an image of your face that you provide through our JUUL Website; collect a photo or scan of your face as it appears on an identification document; and employ facial recognition technology to verify your identity and age. Berbix provides us with a report of its findings. JUUL Labs does not collect, retain or possess the original photos or scans that you submit to Berbix. By using Berbix, you are submitting your photos and identification documents for verification directly to Berbix, you are agreeing to share your identification with Berbix, and you agree that Berbix is solely responsible for any use or loss of data. To learn how Berbix will collect and use your information, please refer to Berbix's [Privacy Policy](#) and [Terms of Service](#).

## **6. Third Party Tracking And Online Advertising**

We may share, or we may permit third-party online advertising networks and other third-party services, to collect, information about your use of our e-commerce Website over time so that they may play or display ads that may be relevant to your interests on our e-commerce Website as well as on other websites or apps. Additionally, the e-commerce Website utilizes third-party sites to provide content to customers such as social media features. These third-party sites may set cookies on your browser and/or obtain your IP address.

Typically, though not always, the information we share is provided through cookies or similar Tracking Technologies, which recognize the device you are using and collect information, including hashed data, click stream information, browser type, time and date you visited the e-commerce Website, and other information. This information is used to display targeted ads on or through our Service or on other websites or apps, including on Facebook. We or the online advertising networks use this information to make the advertisements you see online more relevant to your interests. As noted above, depending on your browser or mobile device, you

may be able set your browser to delete or notify you of cookies and other Tracking Technology by actively managing the settings on your browser or mobile device. We do not permit third-parties to collect your identifiable information from the Websites unless you provide it to them directly.

## **A. Information Collected Via Technology**

As you use our Websites and services, certain information may also be passively collected and stored on our or our service providers' server logs, including your Internet protocol address, browser type, and operating system. We also use Cookies and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit and the solutions and information for which you searched and viewed, or on which of the advertisements displayed on Website you clicked. This type of information is collected to make our Websites and Service more useful to you and to tailor the experience with the Websites to meet your special interests and needs.

An "Internet protocol address" or "IP Address" is a number that is automatically assigned to your computer when you use the Internet. In some cases, your IP Address stays the same from browser session to browser session; but if you use a consumer internet access provider, your IP Address probably varies from session to session. For example, we, or our service providers, may track your IP Address when you access our e-commerce Website to assist with ad targeting.

"Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. Please read our [Cookies Policy](#) for more information. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience. Persistent Cookies can be removed by following your Internet browser help file directions. In order to use our Services, your web browser must accept Cookies. If you choose to disable Cookies, some aspects of our Websites may not work properly, and you will not be able to receive certain services.

To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org/choices>, and/or the DAA's resources at [www.aboutads.info/choices](http://www.aboutads.info/choices), and you may also adjust your ad preferences through your Facebook settings.

## **7. Your California Privacy Rights**

### **A. Information Shared for Direct Marketing Purposes**

If you are a California resident, you have the right to receive, once per year, free of charge:

- 1) the identity of any third-party company to which we have disclosed your personal information for that company's direct marketing purpose on our Websites; and
- 2) a description of the categories of personal information disclosed. To request this information, please contact us at [dataprivacy@juul.com](mailto:dataprivacy@juul.com).

### **B. Confirmation of Purchases**

If you are a California resident who makes a purchase through our ecommerce website, we will make one phone call with an auto dialer and pre-recorded voice to the phone number you provide in order to confirm the order, pursuant to California law.

### **C. California Consumer Privacy Act Rights ("CCPA")**

As of January 1, 2020, verified California residents will have the right to:

- Request and receive disclosure of our personal information collection practices during the prior 12 months, including the categories of personal information we collect, the categories of sources of such information, our business purpose for collecting or sharing such information, and the categories of third parties with whom we share such information;
- Request and receive a copy of the personal information we have collected about them during the prior 12 months;
- Request and receive disclosure of our information sharing practices during the prior 12 months, including a list of the categories of personal information sold with the category of third-party recipients and a list of the categories of personal information that we disclosed for a business purpose;
- Request that we not sell personal information about them; and
- Request that we delete (and direct our service providers to delete) their personal information subject to certain exceptions.

For purposes of the CCPA personal information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

In order to make a request for disclosure California residents may contact us by visiting <https://juul.force.com/us/s/ccpa> or by calling (844)-668-6900. We will ask you for information that allows us to reasonably verify your identity (that you are the person about whom we collected personal information) and will use that information only for that purpose. We cannot respond to your request or provide you with personal information if we cannot verify your identity and confirm that the personal information relates to you.

You may make a request up to twice within a 12-month period. We will endeavor to respond within forty-five days of receipt of your request, but if we require more time (up to an additional forty-five days) we will notify you of our need for additional time.

For requests for a copy of the personal information we have collected during the 12 months prior to your request we will endeavor to provide the information in a format that is readily useable, including by mailing you a paper copy or providing an electronic copy to your registered account, if you have registered an account with us.

We will not discriminate against you as a result of your exercise of any of these rights.

We do not provide personal information to third parties in exchange for monetary consideration, but during the past 12 months, we have disclosed data to certain third parties that provide us with services such as assisting with marketing, data analysis and security, which may fall under the definition of “consideration” and be considered a “sale” under the CCPA.

Our Service is not intended for individuals under the age of 21. We do not knowingly collect or solicit any information from anyone under the age of 21 on this Service. Under CCPA, if you would like to instruct us not to sell your personal information, please visit our Do-Not-Sell web page at <https://juul.force.com/us/s/ccpa>. We do not sell personal information of individuals we actually know are less than 21 years of age. Once we receive your Do-Not-Sell request we will wait at least 12 months before asking you to reauthorize personal information sales.

During the past 12 months, depending upon which Websites you have visited, we have collected the following categories of information from the listed sources, used it for the listed business purposes and shared it with the listed categories of third parties. The categories of information include information we collect from our website visitors, registered users, employees, vendors, suppliers and any other person that interacts with us either online or offline. Not all information is collected about all individuals. For instance, we may collect different information from applicants for employment or from vendors or from customers.

Categories of Information Collected	How We Collect Your Information	Business Purpose Use for Your Information	Third Parties Receiving Your Information
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• Individuals submitting information to us and/or</li> <li>• Information we automatically collect from site visits and/or</li> <li>• Employment information/applications</li> </ul>	<ul style="list-style-type: none"> <li>• Performing Services for You</li> <li>• Transaction Audits</li> <li>• Block and remove fraudulent/unverified users</li> <li>• Functionality debugging/error repair</li> <li>• Ad customization</li> <li>• Internal Research &amp; development</li> <li>• Quality Control</li> <li>• Compliance with Federal, State and Local regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, mail houses, marketing partners, shipping partners, employee benefits partners)</li> </ul>



		<ul style="list-style-type: none"> <li>• Product Identification and Administration</li> </ul>	
<b>Sensitive Information</b>	<ul style="list-style-type: none"> <li>• Individuals submitting information to us and/or</li> <li>• Employment Applications and/or</li> <li>• Employee Information</li> </ul>	<ul style="list-style-type: none"> <li>• Transaction Audits</li> <li>• Security detection, protection and enforcement</li> <li>• Functionality debugging/error repair</li> <li>• Ad customization</li> <li>• Performing services for you</li> <li>• Internal Research &amp; Development</li> <li>• Quality Control</li> <li>• Compliance with Federal, State and Local regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Service Providers (such as payment processors, employee benefits partners)</li> </ul>
<b>Protected Class Information</b>	<ul style="list-style-type: none"> <li>• Individuals submitting information to us and/or</li> <li>• Employment Applications and/or</li> <li>• Employee Information</li> </ul>	<ul style="list-style-type: none"> <li>• Transaction Audits</li> <li>• Security detection, protection and enforcement</li> <li>• Performing services for you</li> <li>• Internal Research &amp; development</li> <li>• Quality Control</li> <li>• Compliance with Federal, State and Local regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Service Provider (such as employee benefits partners)</li> </ul>
<b>Commercial Information</b>	<ul style="list-style-type: none"> <li>• Individuals submitting information and/or</li> <li>• Information we automatically collect from site visitors</li> </ul>	<ul style="list-style-type: none"> <li>• Transaction History, Auditing, Purchase and Use Restrictions, Product Improvement, Product Identification</li> <li>• Security detection, protection and enforcement</li> <li>• Functionality debugging/error repair</li> <li>• Ad customization</li> <li>• Internal Research &amp; development</li> <li>• Quality Control and Assurance</li> <li>• Product Improvement</li> <li>• Compliance with Federal, State and Local regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as marketing partners, shipping partners)</li> </ul>
<b>Electronic Network Activity</b>	<ul style="list-style-type: none"> <li>• Information automatically collected from site visitors</li> </ul>	<ul style="list-style-type: none"> <li>• Transaction Audits</li> <li>• Security detection, protection and enforcement</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, security detection)</li> </ul>

		<ul style="list-style-type: none"> <li>• Functionality debugging/error repair</li> <li>• Ad customization</li> <li>• Performing services for you</li> <li>• Internal research and development</li> <li>• Quality control</li> </ul>	
<b>Audio/Video Information</b>	<ul style="list-style-type: none"> <li>• Individuals submitting information and/or</li> <li>• Information we collect for security purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Transactions Audits</li> <li>• Security detection, protection and enforcement</li> <li>• Functionality debugging/error repair</li> <li>• Ad customization</li> <li>• Performing services for you</li> <li>• Internal research and development</li> <li>• Quality control</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as payment processors, security detection)</li> </ul>
<b>Biometrics</b>	<ul style="list-style-type: none"> <li>• Individuals submitting information and/or</li> <li>• Information we collect for security purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Transaction Audits</li> <li>• Security detection, protection and enforcement</li> <li>• Performing services for you</li> <li>• Compliance with Federal, State and Local regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as marketing partners, shipping partners)</li> </ul>
<b>Geolocation</b>	<ul style="list-style-type: none"> <li>• Information we automatically collect from site visitors</li> </ul>	<ul style="list-style-type: none"> <li>• Transaction Audits</li> <li>• Security detection, protection and enforcement</li> <li>• Functionality debugging/error repair</li> <li>• Ad customization</li> <li>• Performing services for you</li> <li>• Internal research and development</li> <li>• Quality Control</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers (such as marketing partners)</li> </ul>
<b>Inference from Above (Preferences, Characteristics, Behavior, Attitudes, Abilities, etc.)</b>	<ul style="list-style-type: none"> <li>• Internal analytics</li> <li>• Information we automatically collect from site visitors</li> <li>• Information submitted by individuals</li> </ul>	<ul style="list-style-type: none"> <li>• Transaction Audits</li> <li>• Security detection, protection and enforcement</li> <li>• Functionality debugging/error repair</li> <li>• Ad customization</li> <li>• Performing services for you</li> <li>• Internal Research &amp; Development</li> <li>• Quality Assurance</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers</li> </ul>

## 8. Track + Trace

During the past 12 months we have not collected information through the Track + Trace program on our corporate website as this a new feature Going forward, when a submission is made, we will be collecting the serial number of the product and an optional email address for the reporter. Submissions are intended in cases when a product has been confiscated from a minor, and facilitates appropriate remediation with the retailer suspected of selling the product. Information collected through this program is used internally for safety and security, legal compliance, device monitoring, and performing remedial actions to curtail the improper or illegal use of our devices.

Categories of Information Collected	How We Collect Information through Track + Trace	Business Purpose Use for This Information	Third Parties Receiving This Information
Identifiers	<ul style="list-style-type: none"> <li>• Individuals submitting information to us</li> </ul>	<ul style="list-style-type: none"> <li>• Block and remove fraudulent and unverified users</li> <li>• Internal research and development</li> <li>• Quality Control</li> <li>• Compliance with Federal, State and Local regulations</li> </ul>	<ul style="list-style-type: none"> <li>• Serial numbers are referenced through a 3<sup>rd</sup> party system to identify the point of sale, although no identifiers are shared externally.</li> </ul>

## 9. Notice To Nevada Residents

We do not transfer personal information for monetary consideration. If you would like to tell us not to sell your information in the future please email us at [dataprivacy@juul.com](mailto:dataprivacy@juul.com) with your name, postal address, telephone number and email address with “Nevada do not sell” in the subject line.

## 10. Rights With Respect To Your Data

Modifying or deleting your information. If you have any questions about reviewing, modifying, correcting, or deleting your information, or if you want to remove your name or comments from our Website or publicly displayed content, you can contact us directly at [dataprivacy@juul.com](mailto:dataprivacy@juul.com). We may not be able to modify or delete your information in all circumstances.

Opt-out of App’s Usage Recording Feature. You may turn off the App’s Usage Recording Feature at time of download, or you may delete the App from your device.

How to control your communications preferences: You can stop receiving promotional email communications from us by clicking on the “unsubscribe link” provided in such communications. We make every effort to promptly process all unsubscribe requests. You may not opt out of product or service-related communications (e.g., account verification, transactional communications, changes/updates to features of the service, technical and security notices).

## **11. Privacy Of The Underage**

Our Service is not intended for individuals under the age of 21. We do not knowingly collect or solicit any information from anyone under the age of 21 on this Service. In the event that we learn that we have inadvertently collected personal information from an individual under age 21, we will delete that information as quickly as possible. If you believe that we might have any information from an individual under 21, please contact us at [dataprivacy@juul.com](mailto:dataprivacy@juul.com). Protecting the privacy of the underage is very important to us. Thus, if we obtain actual knowledge that a user is under 21, we will take steps to remove that user's Personal Information from our databases.

## **12. Users Outside Of The U.S.**

Your information collected through our website may be stored and processed in the United States or any other country in which JUUL Labs or its affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which JUUL Labs or its parent, subsidiaries, affiliates, or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

## **13. Third-party Websites**

Our Service may contain links to websites operated by third parties. This Privacy Policy does not apply to these third-party website or services. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms & conditions and that we do not accept any responsibility or liability for their policies. Links should be clicked at your own risk, and it is your sole responsibility to review the applicable privacy policy and terms and conditions of any third-party website accessed.

## **14. Security**

We take the security of your information extremely seriously and employ physical, administrative, and technological safeguards designed to preserve the integrity and security of all information collected through our website. Our Service support the industry standard Secure Socket Layer (SSL) encryption which is applied to all data transmitted so it cannot be read by others. In addition, if you are using a shared computer to access the Website, we recommend that you log out of your account before ending your browser session. This will also ensure that your account will not be used by anyone other than yourself. Unfortunately, the transmission of information online is not completely secure. Although we do our best to protect all information collected through the Service, we cannot guarantee the security of your information collected and/or transmitted through the Services. Any transmission of information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

## **15. SMS Short Code And Partner Technology Privacy Policy**

We collect information in the form of the content that you submit during your use of JUUL Labs' e-commerce Website, such as photos, comments, ratings and other information you choose to submit. We may also collect information about you and your friends, from any social network you may have connected from, in order to provide you with a more personalized experience. For instance, we may collect your user ID or profile information that you have permitted to be displayed in order to display you as a friend or in association with your profile and collections. When you order our products or services, you will need to submit your credit card or other payment information so that our service providers can process your payment for those products and services. If you choose to sign up to receive information about products or services that may be of interest to you, we will collect your email address and all related information. Additionally, we collect any information that you voluntarily enter, including personally identifiable information, into any postings, comments, or forums within the JUUL Labs community. For each of these personally identifiable information collections (or any below), we will ask for your consent and provide you with clarity before making any such collections. Additionally, you will have the option to opt out of any of these collections at any time and we will stop collecting such data from you.

### **A. Personal Information from Other Sources**

We may receive personally identifiable information about you from other sources with which you have registered, companies who we have partnered with (collectively, "Partners") or other third parties. We may associate this information with the other personally identifiable information we have collected about you.

### **B. E-mail and E-mail Addresses**

If you send an e-mail to us or fill out our "Feedback" form through JUUL Labs' Websites or Service, we will collect your e-mail address and the full content of your e-mail, including any attached files, and other information you provide. We may use this e-mail address to contact you, for example, in the case of the e-commerce Website, for things such as notifications of limited-edition sales. You may indicate your preference to stop receiving further promotional and other communications as further detailed below.

### **C. Information you Post**

You understand that when you use the e-commerce Website, certain information you post or provide through the Website, such as your name, profile, comments, posts and ratings, may be shared with other users and posted on publicly available portions of the e-commerce Website, including without limitation, chatrooms, bulletin and message boards, along with other public forums. Please keep in mind that if you choose to disclose personally identifiable information when posting comments or other information or content through the e-commerce Website, this information may become publicly available and may be collected and used by others, including people outside the JUUL Labs community. We will not have any obligations with respect to any information that you post to parts of JUUL Labs' Websites available to others and recommend

that you use caution when giving out personal information to others in public forums online or otherwise. We also share the information you publish with other third parties.

#### **D. SMS Terms of Service**

When you opt in to receive marketing messages, we will send you an SMS message to confirm your sign up.

Upon completing 2-Factor Authentication, users will be automatically enrolled in Transactional message SMS.

You can cancel the SMS service at any time. Just reply “STOP”. 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.

Users must explicitly elect to opt in to JUUL Marketing SMS.

We are able to deliver messages to the following mobile phone carriers:

Major carriers: AT&T, Verizon Wireless, Sprint, T-Mobile, U.S. Cellular, Alltel, Boost Mobile, Nextel, and Virgin Mobile.

Minor carriers: Alaska Communications Systems (ACS), Appalachian Wireless (EKN), Bluegrass Cellular, Cellular One of East Central IL (ECIT), Cellular One of Northeast Pennsylvania, Cincinnati Bell Wireless, Cricket, Coral Wireless (Mobi PCS), COX, Cross, Element Mobile (Flat Wireless), Epic Touch (Elkhart Telephone), GCI, Golden State, Hawkeye (Chat Mobility), Hawkeye (NW Missouri), Illinois Valley Cellular, Inland Cellular, iWireless (Iowa Wireless), Keystone Wireless (Immix Wireless/PC Man), Mosaic (Consolidated or CTC Telecom), Nex-Tech Wireless, NTelos, Panhandle Communications, Pioneer, Plateau (Texas RSA 3 Ltd), Revol, RINA, Symmetry (TMP Corporation), Thumb Cellular, Union Wireless, United Wireless, Viaero Wireless, and West Central (WCC or 5 Star Wireless).

This list may change without warning and without notice to you.

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.

As with any of its programs, JUUL Labs, Inc. may discontinue this program at any time and without notice to you.

## **16. Changes To This Privacy Policy**

We may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the Privacy Policy in a material manner, we will let you know and update date at the top of this page. If you object to any changes, you may close your account. Continuing to use our Websites and Services after we publish changes to this Privacy Policy means that you are consenting to the changes.

## **17. Contact Us**

If you have any questions about this Privacy Policy, please contact us at [dataprivacy@juul.com](mailto:dataprivacy@juul.com).