

Juul Labs, Inc. Global Privacy Notice

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1. SCOPE

This Privacy Notice describes how JUUL Labs, Inc. and its affiliates and subsidiaries (“Juul Labs,” “we,” “us,” or “our”) collect, use, disclose and otherwise process information that identifies you or could reasonably be used to identify you (“personal data” or “personal information”). Unless otherwise specified, JUUL Labs, Inc. is the controller of, and responsible for the personal data we process under this Privacy Notice.

This Privacy Notice applies to personal data processed by us on websites where we sell our products (the “E-commerce Sites,” or the “Sites”), mobile or web-based applications that may pair with certain of our products (any, a “JUUL App”), and other online or offline offerings that we may make available to adult audiences (collectively, the “Services”) that link to this Privacy Notice.

This Privacy Notice may be supplemented or superseded by other privacy notices that may relate to specific jurisdictions, products, or relationships you have with Juul Labs. For example:

- If you are a resident of the UK, EU, Canada, an US state or other jurisdiction with a comprehensive privacy law, additional detail about the information we collect is contained in the [Supplemental Disclosures](#) section below.

- If you work for Juul Labs or apply for a job with us, the terms of [Worker and Applicant Privacy Notice](#) describe how we process your personal data in the employment context.
- If you are eligible and elect to participate in market research or product improvement studies we may conduct or sponsor from time to time, all personal data, including any sensitive or special category data that we may collect will be described at the time you enroll and be processed in accordance with the terms of the explicit, informed consent you provide at the time.

[Learn more about your privacy rights and how to exercise them.](#)

2. INFORMATION WE COLLECT

The categories of personal data we collect depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources, such as third-party services and organizations, as described below. If we are required by applicable law or by the terms of a contract to collect your personal data and you fail to provide the necessary information to us, we may not be able to provide you with Services you requested or otherwise perform our contract with you.

- **Age Verification Information.** Juul Labs' products and services are age-restricted to ensure they are available only to individuals who are legally eligible to purchase our products in the jurisdiction in which they are offered ("Adults"). To access our E-Commerce Sites, or to participate in certain consumer programs, you must verify that you are legally eligible to purchase our products in your jurisdiction. To verify your age, we, and or

our third-party service providers specializing in age verification and fraud deterrence (any, an “Age Verification Provider”) may collect information such as your address, email, phone number, date of birth, government ID, the last few digits of your government-issued identifying documentation, or facial photos (such as “selfies”) used for verifying age against a government ID. Our Age Verification Provider(s) may also use age estimation technologies to verify that you are an Adult. If you elect to use age estimation to verify your eligibility to access our E-Commerce Sites, you submit a live photo/video directly to our Age Verification Provider who analyzes the image to estimate your age, sends Juul Labs a verification result and timestamp (whether you are an Adult or not), and deletes the image. We only receive and store the verification result and timestamp associated with the age estimation.

- **Account Information.** We collect personal data when you register and create an account on our E-Commerce Sites, such as residential address including zip or postal code to determine eligibility for delivery, name, email address, username and password, telephone number, and any other details in connection with your account (“Account Details”).
- **Payment Information.** We may collect personal data and details associated if you make a payment on our E-Commerce Sites. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (e.g., your billing details).
- **Device and Non-App Usage Information.** We collect information about the devices you use to access our Services, including technical information

about your device and network, such as hardware model, operating system version, your internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier and other unique mobile identifiers, browser or device information, location information (including approximate location derived from IP address), and internet service provider. We may also collect information about your activity on our Services and your interactions with our ads and communications, such as the routes by which you access our Services along with access dates and times, browsing behavior such as pages viewed, links clicked, information about your activity on a specific page(s) and other information about how you use our Services.

- **JUUL2 Device and JUUL App Data.** Depending on your jurisdiction, you may be able to purchase and pair the JUUL2 device (“JUUL2 Device”) with our JUUL App. If you use a JUUL2 Device and elect to pair it with the JUUL App, we will collect: (i) data about your interactions with the JUUL App, such as where the JUUL App is running in the mobile device’s operating system, when a notification is sent to or cleared from, the JUUL App, or when you tap on certain of the JUUL App’s buttons (“App Data”) and (ii) logs of activity that takes place on a JUUL2 Device that has been synced with a paired JUUL App, such as device-level details about firmware updates, pod insertion, pod compatibility, pod flavor, nicotine concentration, liquid levels, battery charge and similar diagnostics (“Device Data”). App Data and Device Data are maintained in pseudonymized states but will be associated with your Account Details to support your use of a JUUL2 Device paired with the JUUL App.

- **JUUL2 Usage Data.** If you use a JUUL2 Device and elect to pair it with the JUUL App, data relating to how you use paired JUUL2 Device(s), such as puff-related data, pod consumption and pod-history (“Usage Data”) will be collected and maintained on your JUUL2 Device. We allow you to create encrypted backups of your Usage Data to Juul Labs server so that you can transfer these data to a JUUL App on a new mobile device or protect copies of these data stored in a web-based version of the JUUL App (“Your Backup Data”). Your Backup Data is encrypted and inaccessible to us. Your Usage Data is only accessible to us if: (i) you return your JUUL2 Device to us and give us permission to access Device Data and Usage Data, such as in connection with a [warranty claim](#) or [medical/health claim](#); (ii) you return your JUUL2 Device with a product complaint that legally obligates us to conduct an investigation involving your Usage Data, or (iii) you have enrolled in a study and have provided consent to us to access those data.
- **Location Information.** We may collect or infer information about your location based on your mailing address, zip or postal code, or IP address that we collect through our E-Commerce Sites. If you download and install the JUUL App on, and enable location sharing in, your mobile device, the JUUL App will use the location of your mobile device to provide you with connected features. App-based location data is not shared with us but is used only to allow you to use the “Store Locator” or “Locate My JUUL” features in the JUUL App. The “Store Locator” feature uses the GPS coordinates of your mobile device to display locations that are authorized to sell JUUL products and have committed to age verification. The “Locate My JUUL” feature helps you locate your JUUL2 Device by using the last

location of your mobile device running the JUUL App when it was last connected to your JUUL2 Device. It works by sharing de-identified location coordinates of your mobile device with a third-party mapping service provider to provide you with map information, leveraging information locally available to you through your JUUL App.

- **Adverse Experience Reports.** If you contact us to report a potential issue, concern, or complaint related to an adverse experience potentially related to the use of our products (any, an “Adverse Experience”), we are required to collect certain information, including potentially sensitive and special category personal data about the health and habits of the person with whom the Adverse Experience is associated.
- **Device Registration.** We may collect information about any JUUL device you register on our E-Commerce Sites. If you register a JUUL device, we will collect information about the device (such as device type, serial number, and date and purchase location type) which we will associate with you and your Account Details.
- **Device Reports.** If you report a JUUL device that was confiscated from a minor through our [Track + Trace program](#), we collect the serial number of the confiscated JUUL device but do not collect personal data about the individual reporter (or any other individual).
- **Warranty Information and Claims Data.** In the event you return a registered JUUL2 Device in connection with a warranty claim, we will only access Device Data and Usage Data with your prior explicit consent unless we are otherwise required by applicable laws, including those relating to health and safety (such as in the case that a warranty claim relates to an Adverse Experience).

- **Customer Service and Feedback.** We may collect personal data, such as email address, phone number, or mailing address when you request information about our Services, register for any informational communications, marketing and promotional correspondence, request customer or technical support (including through automated chat or voice tools) or otherwise communicate with us.
- **Reviews and Online Comments.** Age-verified adult account holders may submit product reviews on our E-Commerce Site. If you elect to submit a review or comment, we may use personal data that you submit or make available in your review or comment, as well as personal data associated with your account. Though we vet content intended to be posted on our E-Commerce Sites and reserve the right to modify it, any information you provide through a review or public-facing sharing features of the Services may be made public.
- **Promotional Activities.** We may collect personal data from you if you are an age-verified adult accountholder on our E-Commerce Site and you elect to participate in promotions we offer from time to time, such as discount or incentive offers. We may also identify eligible adults to participate in other commercial programs if and as we may develop and offer them from time to time (any, an “Optional Program”) If you elect to participate in any of our Optional Programs, we may collect personal data from you to verify your eligibility and or to support your participation in the Optional Program. Any promotions we offer will be conducted and managed in compliance with applicable law, which may dictate the type of personal data we collect and whether and how we disclose it.

- **Conferences, Trade Shows, and Other Events.** We may collect personal data from individuals when we attend or host conferences, trade shows, and other events.
- **Business Contacts.** We may collect personal data from individuals and third parties to conduct due diligence or otherwise assess and pursue potential business opportunities.
- **Social Media Account Information.** If you link or communicate with us via a third-party social media account, we may collect information you have publicly shared on your account.

3. HOW WE COLLECT INFORMATION

There are several ways we may obtain information about you. We collect information about you (a) that you elect to provide to us when using our Services and when you otherwise interact with us, such as through our customer service channels, (b) that we collect automatically when you use our Services, and (c) that we receive from third parties.

- **We Collect Information from You Directly.** We collect information when you use our Services or otherwise interact with us. This includes registering to use our Services and creating an account on an E-Commerce Site, placing an order, providing a review, registering, or reporting a device, signing up for communications, or participating in surveys or promotional programs we may offer. Further, if you elect to back-up your JUUL2 Usage Data to our servers, we store Your Backup Data in an encrypted form and can only access Your Backup Data with your JUUL2 Device that has been returned to us in connection with a Warranty or Adverse Event claim.

- **We Collect Information Automatically When You Use Our Services.**

We as well as third parties that provide content, analytics, or other functionality on our Services, may use cookies, pixel tags, and other technologies (collectively, “Tracking Technologies”) to automatically collect information through your use of our Services. This includes information about your equipment, browsing actions and patterns. We also collect Personal and Deidentified Data Automatically When You Pair a JUUL2 Device with the JUUL App as described in the [JUUL2 Device and JUUL App Data](#) and [JUUL2 Usage Data](#), sections above.

- **We Collect Personal Data from Third-Party Services and Other**

Sources. Where permitted by law, we may obtain personal data about you from third-party services and organizations, from other individuals or from publicly available sources. For example, we may require you to verify your age via an Age Verification Provider that will verify you are legally eligible to purchase our products in your location. Further, if you access our Services through a third-party application, such as a social networking site, we may collect personal data about you from that third-party application that you have made available via your privacy settings. We may also use identity and contact data that we receive from our marketing partners, to help us more effectively target our postal marketing campaigns. Finally, it is possible for us to receive personal data from other individuals (such as a spouse or family member) who contact us to report a potential Adverse Experience experienced by you when using our products.

4. HOW WE USE INFORMATION

We will only use your personal data for lawful purposes. Specifically, we may use your personal data for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below. More information about the legal basis for each of these purposes under applicable data protection laws is set forth in our [Supplemental Disclosures](#).

We will only use your personal data for the purpose for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose as specified in applicable data protection laws. If we need to use your personal data for a purpose that we have not specified in this Privacy Notice, we will notify you where we are required by applicable data protection laws to do so and we will explain the legal basis which allows us to do so, or seek your consent, as required.

- **We Use Information to Provide our Services.** We use personal data and other information to provide our Services, including by:
 - Verifying your age and eligibility to visit our E-Commerce Sites, use the JUUL App and other Services, register you as a new customer of our E-Commerce Sites and buy our products;
 - Confirming and fulfilling your purchases;
 - Managing our relationship with you, your information and account;
 - Providing access to certain areas, functionalities, and features of our Services such as Auto-Ship;
 - Answering requests for customer or technical support;
 - Communicating with you about your account, activities on our Services, and policy changes, and

- Processing your financial information and other payment methods on our E-Commerce Sites.
- **Administrative, Regulatory and Compliance Purposes.** We may use your personal data for various administrative, regulatory and compliance purposes, such as:
 - Authenticating and verifying age to ensure lawful access to our regulated products and requests to exercise privacy rights under applicable law;
 - Providing information required to meet our compliance obligations or commitments, such as preventing underage use of our products or collecting information from individuals who may have experienced potentially Adverse Experiences when using our products;
 - Reporting Adverse Experiences reported to, or discovered by us, to relevant oversight authorities;
 - Detecting underage use of our products, security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and investigating, educating and or prosecuting those responsible for that activity;
 - Auditing relating to interactions, transactions, and other compliance activities including combatting and investigating underage use of our products;
 - Measuring interest and engagement in our Services, including the use of data analytics to improve our website, products, app and customer experience;
 - Improving, ensuring the safety of, and operating quality controls pertaining to, upgrading, or enhancing our devices and Services;

- Debugging to identify and repair errors with our products and Services;
 - Delivering relevant website content and advertisements to you and measuring and understanding the effectiveness of the advertising we serve to you;
 - Sharing personal data with third parties we've engaged as service providers as necessary to provide the Services;
 - Enforcing our agreements and policies, including without limitation, violations of our commercial terms with distributors or retailers, our Terms & Conditions, and this Privacy Notice, including notifying you of changes to this Privacy Notice;
 - Carrying out activities that are required to comply with our legal obligations (including obligations imposed by regulatory decree, court order, or legal settlement), or when we believe it is necessary to investigate, prevent, or take action regarding underage use or purchase of our products, illegal activities, suspected fraud and/or counterfeit, situations involving potential threats to the safety of any person;
 - Providing relevant or requested evidence in litigation in which we are involved, and
 - For other legitimate business purposes as permitted by law.
- **Marketing and Advertising our Products.** We may use personal data to market and advertise our products to adult consumers in accordance with our internal guidelines, as permitted by applicable law, and consistent with applicable court orders, settlements, regulations, or other voluntary commitments undertaken by us. For example, we may make product

recommendations or offers available to current account holders based on past purchase history or other relevant information.

- **De-identified and Aggregated Information.** We may use personal data to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create. We use this de-identified or aggregated data for the purposes outlined in this Privacy Notice and afford it appropriate protections as required by applicable data protection and other laws.
- **Other Purposes.** We may also use your personal data for other purposes with your consent, as requested by you or as required or permitted by applicable law.

5. HOW WE DISCLOSE INFORMATION

We may disclose your personal data to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

We may also disclose your information with third parties as required, appropriate or otherwise permitted by law.

We do not allow our third-party service providers that process your personal data on our behalf to use your personal data for their own marketing or any other purposes, and we only permit them to process your personal data pursuant to the terms of written contracts for specified purposes and in accordance with our instructions.

- **Disclosures to Provide our Services.** The categories of third parties with whom we may share your personal data are described below.
 - **Service Providers.** We may disclose your personal data to our third-party service providers and vendors that assist us with the provision of our Services. Service providers include, for example, Age Verification Providers, internet service providers, data analytics providers, operating systems and providers, and vendors that provide us with IT support, hosting, payment processing, customer service, and related services.
 - **Business Partners.** We may disclose your personal data to our business partners to provide you with a product or service you have requested. This includes, for example, delivery service providers that we use to fulfill orders made on our E-Commerce site.
 - **Affiliates.** We may disclose your personal data to our company affiliates (other companies and brands owned, controlled, or under common ownership with Juul Labs) for administrative or regulatory compliance purposes, IT management, or for them to provide services to you or support and supplement the Services we provide.
 - **Social Networks.** Your personal data may be disclosed to social networks if you visit our corporate social media accounts by clicking a social media widget from our Sites (e.g., X or LinkedIn).
 - **Advertising Partners.** Certain areas of our E-Commerce Sites that are available exclusively to logged-in, age-verified account holders may enable advertising Tracking Technologies. If Tracking Technologies are enabled for advertising purposes, third-party advertising partners may collect information regarding your device

and activities on the E-Commerce Sites (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day, etc.).

- **Disclosures to Protect Us or Others**

- **Government Entities and Parties to Litigation.** We may disclose your personal data to government entities or in the context of private or public litigation, for our administrative purposes, to meet our statutory, regulatory, or other compliance-related obligations, or to respond to a legal inquiry or mount a defense to an allegation in a legal or regulatory context.
- **External Parties to Comply with Legal Process or in the Public Interest.** We may access and disclose personal data or information we can associate with you to external parties if we believe in good faith that doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; to protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

- **Disclosures in the Event of Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and contract.

6. ONLINE TRACKING TECHNOLOGIES

We as well as third parties that provide content, analytics, or other functionalities in relation to our Services, may use technologies such as cookies, web beacons and similar tools (“Tracking Technologies”) to automatically collect information through your use of our Services and distinguish you from other users of the Services.

We may use Tracking Technologies in various ways, as described by the following categories:

- **Essential Tracking Technologies.** These Tracking Technologies are essential to our ability to offer our Services and include technologies that allow you access to our Services, applications, and enable tools that we use to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of embedded functionalities or features of our Services.
- **Performance-Related Tracking Technologies.** These Tracking Technologies help us assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services.
- **Functionality-Related Tracking Technologies.** These Tracking Technologies allow us to operate our Services and offer enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past viewing activities.
- **Analytics.** These Tracking Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services.

- **Social Media Platforms.** We maintain corporate social media accounts that contain only informational, non-promotional content such as job postings, press releases on scientific research, public policy updates, or potential product safety notices. If you visit one of our corporate social media accounts, the social media site, like any other third-party site, may collect personal data. Your interactions with these platforms are governed by the privacy policy of the company providing it.
- **Fraud and Abuse Prevention Providers.** We may use third-party services to protect our Sites from fraud and abuse. For example, we may use Google's reCAPTCHA technology to evaluate various device-and-user based analytics to estimate whether the activity is from an automated program (i.e. a "bot") or a human.

7. YOUR PRIVACY CHOICES

The privacy choices you have about your personal data are determined by your specific circumstances, the context, and applicable law, and are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications.
- **Text Messages.** If you provide your mobile telephone number to us for the purpose of setting up and securing your account on our E-Commerce Sites and completing age, identity and phone number verification, we will send

one-time passcode ("OTP") text messages to that number in conjunction with account creation, password reset, login verification, account recovery, and other account-security and identity-verification events. OTP messages are the only mobile messages we will send to that number unless you affirmatively opt into our mobile messaging program as described below. If you affirmatively opt in to our mobile messaging program through your account on our E-Commerce Sites or through another method we may offer, you consent to receive: (1) transactional messages relating to a transaction or service interaction with us, such as order confirmations, shipping updates, account alerts, and similar communications; and (2) promotional messages delivering marketing, promotional, and informational content about JUUL products and offers. You may opt out of all transactional and promotional mobile messages at any time by replying STOP in accordance with the opt out methods described in the Mobile Messaging Terms or in the Terms and Conditions applicable to your E-Commerce Site. We will not sell or share your phone number or mobile information, or original opt-in data and consent, to third parties for promotional or marketing purposes.

- **Phone calls.** If you receive an unwanted phone call from us, you may opt out of receiving future phone calls from us by following the instructions which may be available on the call, or you may [Contact Us](#) at any time as set forth below. We will not sell or share your phone number or mobile information to third parties for promotional or marketing purposes.
- **Account Deletion.** If you have an account on the E-Commerce Sites, you may request to delete your account by logging in to your account and selecting the "Delete My Account" option under your Profile. If we are

required by law or regulatory obligation to maintain information in your account (for example, to process your warranty claim or investigate a complaint you've filed), we will notify you and process your request when we are legally able. Note that deleting your account will also prevent access to, or further interaction with a JUUL App from that account.

- **Unpairing JUUL2 Devices from the JUUL App.** If you have paired a JUUL2 Device with the JUUL App, you can “forget” any Juul2 Device, so it no longer pairs with, or transmits data to, the App.
- **App Location Data.** If you have installed the JUUL App on your mobile device and enabled location to use its location-enabled features, you can disable location services for the JUUL App in your mobile device settings.
- **App Deletion.** If you have installed the JUUL App on your mobile device, you may delete it and all its data by following the prompts on your device.
- **Tracking Technologies.** You can control our use of certain Tracking Technologies in the following ways:
 - **Cookie Controls.** You may decline all or select the types of non-essential Tracking Technologies that apply to your use of our Services by managing your preferences at any time by clicking “Change Cookie Preferences” in the footer on our [Site](#) or, if you have an account, by logging into your account and managing your “Cookies Settings” through your profile.
 - **Browser Controls.** You may also stop or restrict the placement of certain Tracking Technologies in your browser or remove them by adjusting your preferences as your browser permits. These tools are generally available in the help section of browsers. You can also use

the quick links, based on the browser type that you are using:

[Internet Explorer](#), [Google Chrome](#), [Firefox](#), and [Safari](#).

- **Mobile Device Controls.** You may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#). Please note that cookie-based opt-outs may not stop all mobile tracking, such as tracking done on mobile applications.
- **Ad Industry Opt-outs.** The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Digital Advertising Alliance](#), the [European Digital Advertising Alliance](#), and the [Digital Advertising Alliance of Canada](#). Please note you must separately opt out in each browser and on each device.

8. YOUR PRIVACY RIGHTS

In accordance with applicable law, you may have various privacy rights, as outlined below. If you would like to exercise any of these rights, please [Contact Us](#) at any time as set forth below. We will process such requests in accordance with applicable laws and will not discriminate or retaliate against you for exercising any privacy right granted to you by applicable law.

To protect your privacy, we will take steps to reasonably verify your identity before fulfilling certain types of requests and will begin processing your request once your identity has been verified. Depending on your jurisdiction, you may also designate an authorized agent to exercise a privacy right or rights on your

behalf. We may ask authorized agents to submit proof of their authority to make certain requests (such as deletion or access requests), on your behalf. In some cases, we may be required to contact the individual who is the subject of the request to verify their identity or confirm the authorized agent has permission to submit the request. If you are an authorized agent seeking to make an access, correction, or deletion request on behalf of an individual, please [Contact Us](#).

- **Access and Obtain a Copy** of your personal data, including: (i) confirming whether and how we are processing your personal data; (ii) obtaining access to or a copy of your personal data; and (iii) receiving an electronic copy of personal data that you have provided to us; (iv) for automated information where our processing is based on consent or the performance of a contract with you, or (v) data portability (asking us to send that information to another company in a structured, commonly used, and machine-readable format);
- **Request Correction** of your personal data where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal data;
- **Request Deletion** of your personal data, which enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it, when you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local laws. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;

- **Request Restriction of or Object to** our processing of your personal data where the processing of your personal data: (i) is based on our legitimate interest for direct marketing purposes; (ii) involves processing or sharing of your sensitive personal data for certain non-essential purposes, or in contexts that require your consent; and (iii) for profiling in furtherance of decisions that produce legal or similarly significant effects that concern you;
- **Withdraw your Consent** to our processing of your personal data. Where our processing is based on your consent or subject to your objection, please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal. See “Opt-out of ‘Sale’ and ‘Sharing’” in our [Notice at Collection and US State Privacy Notice](#).
- **Appeal.** You may have the right to appeal our decision or response to your request. To exercise your right to appeal, you can submit an appeal request using the same method used to submit your original request, including by [Contacting Us](#) at any time as set forth below.
- **Exercise Choices Regarding Profiling or Automated Decision-making Technologies.** If your personal data is profiled in furtherance of decisions that produce legal or similarly significant effects concerning you, you have certain regarding the decision and process. If applicable, you also have the right to object to the results, review the personal data used in the profiling and, if the decision is determined to have been based upon inaccurate personal data, the right to have the data corrected and the profiling decision reevaluated based upon the corrected data.

- **Lodge a Complaint.** While we are always willing and eager to listen and respond to your concerns about this Notice or our data practices, at any time you have the right to lodge a complaint with the data protection authority or other regulatory body in charge of enforcing data protection laws in your jurisdiction.

9. INFORMATION SECURITY

We take steps to ensure that your information is treated securely and in accordance with this Privacy Notice. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal data.

10. THIRD PARTY LINKS AND CONTENT

Our Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage you to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal data to third-party websites or applications is at your own risk.

11. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States, Canada, United Kingdom, which jurisdictions may have data protection laws that are

different from the laws where you live. We will safeguard your information consistent with the requirements of applicable laws.

12. INFORMATION RETENTION

We store the personal data we collect as described in this Privacy Notice for as long as necessary to fulfill the purpose(s) for which it was collected, or based upon other criteria, including, but not limited to, the sensitivity and volume of such data, in each case in line with our data retention policies, unless a longer retention period is required or permitted by law. For example, we do not retain the last several digits of your government ID if we have collected them to verify your identity, and any photo you submit in conjunction with the age verification process is deleted after the minimum period required to enable us to meet our legal obligations.

13. UNDERAGE USERS AND AGE VERIFICATION

Our Services are exclusively directed at Adults who have been age-verified. We have designed our E-Commerce Sites and Apps to prevent non-adults from accessing them or otherwise engaging with our Services and we do not knowingly collect personal data from, or otherwise interact with, non-Adults.

Protecting underage individuals is important to us. If you are a parent or guardian and believe your underage child has created an account or otherwise provided personal data through our Sites without your agreement, and wish to have that information modified or deleted, [Contact Us](#) at any time as set out below. If we become aware that an underage individual has provided us with personal data in violation of our policies, compliance obligations or applicable law, we will delete

any personal data we have collected, unless we have a legal obligation to keep it, and terminate the minor's account if applicable.

14. CHANGES TO THIS PRIVACY NOTICE

We review this Privacy Notice periodically and at least annually. We may revise this Privacy Notice as necessary to ensure the accuracy of our disclosed business practices, data handling and applicable laws. If we make any material changes to this Privacy Notice, we will notify you by posting the updated Privacy Notice on our Sites and Apps and as may additionally be required by applicable law.

15. CONTACT US

Please visit our [Privacy Center](#) if you have questions about our privacy practices, this Privacy Notice, or wish to exercise your rights as detailed in this Privacy Notice.

16. SUPPLEMENTAL DISCLOSURES FOR SPECIFIC JURISDICTIONS

- **United States.** Some US states have privacy laws that require specific disclosures and afford residents of those states with additional privacy rights. Please see our [Notice at Collection and US State Privacy Law Notice](#) and our [Consumer Health Data Privacy Notice](#) for details. As described in that Notice, residents of covered states have the right to request access to, and correction or deletion of, their personal information through our [Privacy Center](#) Customer Service at 1-855-852-5885. If you are a resident of a covered state, you may also opt out of “sales,” and

“sharing,” by following the instructions in our [Notice at Collection and US State Privacy Law Notice](#).

- **United Kingdom and European Union.** The table below contains a list of the legal bases on which we rely when processing personal data that is subject to applicable data protection laws in Europe, including the EU General Data Protection Regulation (the **EU GDPR**) and the EU GDPR as it forms part of retained EU law in the United Kingdom, (the **UK GDPR**). Please also note that if your personal data is subject to the EU GDPR or UK GDPR, you may receive a copy of the safeguards we use to protect your personal data when it is transferred internationally on request.

Processing Purpose	Data	Applicable Legal Bases
Provide our Services	Information you share with us including identity, contact, profile, and JUUL App Data	Performance of a contract with you; necessary for our legitimate interests (managing our relationship with you; to keep our records updated and resolve customer issues; to improve, personalize and develop the services we offer you, to communicate with you about your use of our services), and with your consent.
Administrative, Regulatory and Compliance Purposes	Information you share with us including identity, contact, communications, profile, and JUUL App Data, information collected automatically, site, and non-App usage data and JUUL App and Usage Data.	Performance of a contract with you; Necessary to comply with a legal or regulatory obligation (including the defense of claims); Necessary for our legitimate interests (to operate our business, provide administrative and IT services, network security, to prevent fraud and in the context of a business reorganization; to maintain current business records, study how customers use our products/services, resolve customer issues, improve the App and Sites, support personalized features, to detect and resolve technical problems and to develop our business), and with your consent.

Marketing and Advertising Purposes	Information you share with us including identity, contact, site, and non-App usage data, information collected automatically and communications data.	Necessary for our legitimate interests (to study how customers use our products/services, to develop them and to develop and grow our business); Consent if required by law (e.g. for use of non-essential cookies)
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- **Canada.** With respect to our operations in Canada, we collect, use, and disclose your personal data with your consent, except as otherwise permitted or required by law. Your consent may be expressed or implied, depending on the circumstances. Personal data (also referred to as personal information) includes any information about you as an identifiable individual.

We have policies and procedures in place designed to ensure our compliance with this Privacy Notice and applicable laws, including policies and procedures regarding the retention and destruction of personal information, the handling of complaints, and the appropriate management of personal information by our personnel. We restrict access to personal information to those of our personnel with a need to know for the purposes described in this Privacy Notice, which may include personnel in our marketing, customer service, e-commerce, fulfillment, legal, audit, finance, and IT departments.

If you have any questions, including with respect to our use of service providers outside of Canada, please [Contact Us](#) or email privacy.canada@juul.com or vieprivee.canada@juul.com.