



## PRIVACY POLICY

Your privacy is critically important to us.  
Global Beverage Team, LLC is located at:

**Global Beverage Team**  
**141 W. Jackson Blvd., Ste. 1930**  
**Chicago, IL 60604**

In these California Consumer Privacy Act Disclosures ("CCPA Disclosures"), Global Beverage Team, LLC ("Company") discloses information about our data processing practices as required by the California Consumer Privacy Act of 2018 ("CCPA"), and supplement the disclosures in any CCPA Notice at Collection issued in addition to the CCPA Notice at Collection Online provided in Section III below. These CCPA Disclosures are effective as of May 1, 2022.

### **I. Who and what information is subject to these CCPA Disclosures?**

California residents are protected as "consumers" by the CCPA with respect to personal information. A number of statutory exceptions apply under the CCPA and to these CCPA Disclosures, including the following:

1. personal information reflecting a written or verbal communication or a transaction between the business and the consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency and whose communications or transaction with the business occur solely within the context of the business conducting due diligence regarding, or providing or receiving a product or service to or from such company, partnership, sole proprietorship, non-profit, or government agency.
2. personal information that is collected by a business about a natural person in the course of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the natural person's personal information is collected and used by the business solely within the context of the natural person's role or former role as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or a contractor of that business.
3. personal information that is collected by a business that is emergency contact information of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the



extent that the personal information is collected and used solely within the context of having an emergency contact on file.

4. personal information that is necessary for the business to retain to administer benefits for another natural person relating to the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of administering those benefits.

## **II. How can a consumer with a disability access these CCPA Disclosures?**

Consumers who have a visual disability may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this notice.

## **III. CCPA Notice at Collection**

Pursuant to California Civil Code §1798.100(b) and California Attorney General Regulations § 999.305, Company makes this disclosure at or before the point of collection. Company collects the categories of personal information about consumers for the business and commercial purposes set out in our CCPA Privacy Policy, which is set forth below.

## **IV. CCPA Privacy Policy**

Company provides the following disclosures about consumer rights and personal information handling practices in the preceding twelve months, as required by the CCPA and Section 999.308 of the California Attorney General regulations (Privacy Policy).

### **1. Right to Know About Personal Information Collected, Disclosed, or Sold.**

This CCPA Privacy Policy describes personal information we generally collect, use, disclose and sell about California residents. You have the right to request that we disclose what personal information we collect, use, disclose and sell about you specifically ("Right to Know"). To submit a request to exercise your Right to Know, please submit an email request to [PR@gbtbrands.com](mailto:PR@gbtbrands.com) and include "California Request to Know" in the subject line. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practi-



es for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

## 2 .Our Personal Information Handling Practices

We have set out below categories of personal information we have collected about California residents in the preceding 12 months and, for each category of personal information collected, the categories of sources from which that information was collected, the business or commercial purposes for which the information was collected, and the categories of third parties with whom we shared the personal information.

Section	Category of personal information	We collected such personal information to use for the following business or commercial purposes:	We have collected such personal information from the following categories of sources:	We shared such personal information with the following categories of third parties:
1	Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	Internet Protocol Address See section 6 below for details.	Via our Website	Service providers where necessary to perform functions on our behalf.
2	Any categories of personal information described in subdivision (e) of Section 1798.80: "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any	See section 1 above.	See section 1 above.	See section 1 above.



	other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."			
3	Characteristics of protected classifications under California or federal law (classes include race, color, religion, national origin, sex (including pregnancy, childbirth, and related medical conditions), disability, leave, age, citizenship status, genetic information, ancestry, breastfeeding, marital status, gender identity, gender expression, sexual orientation, medical condition including AIDS/HIV, political activities and affiliations, military and veteran status, and status as a victim of domestic violence, assault, or stalking).	Not Collected	Not Collected	Not Collected
4	Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Not Collected	Not Collected	Not Collected
5	Biometric information: Hair color, eye color, fingerprints, height, retina scans, facial recognition, voice, and other biometric data	Not Collected	Not Collected	Not Collected
6	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	Not Collected	Not Collected	Not Collected
7	Geolocation data	Not Collected	Not Collected	Not Collected
8	Audio, electronic, visual, thermal, olfactory, or similar information.	Not Collected	Not Collected	Not Collected



9	Professional or employment-related information.	Not Collected	Not Collected	Not Collected
10	Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	Not Collected	Not Collected	Not Collected
11	Inferences drawn from consumer's personal data to create a profile reflecting a consumer's: Preferences Characteristics Psychological trends Predispositions Behavior Attitudes Intelligence Abilities Aptitudes	Not Collected	Not Collected	Not Collected

### 3. Disclosures of Personal Information, No Sale

Over the preceding 12 months, we disclosed certain categories of California residents' personal information to the categories of third parties as shown in the table above. We do not and will not sell California residents' personal information. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

### 4. Right to Request Deletion of Personal Information

You have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information, please submit an email request to [PR@gbtbrands.com](mailto:PR@gbtbrands.com) and include "California Request to Delete" in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected



account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

## **5. Right to Opt-Out of the Sale of Personal Information**

You have the right to opt-out of the sale of your personal information by a business. We do not, and will not, sell your personal information.

## **6. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights**

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.

## **7. Authorized Agent**

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described in Sections 2 and 3 above:

- Mail a certified copy of your written declaration authorizing the authorized agent to act on your behalf to 194 W. Jackson Blvd., Ste.1930, Chicago, IL 60604 and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.



If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

#### **8. Contact for More Information**

If you have questions or concerns regarding our privacy policy or practices, you may contact us using the following details:

**Email address: [PR@gbtbrands.com](mailto:PR@gbtbrands.com)**

**Postal address: Global Beverage Team, LLC**

**141 W. Jackson Blvd., Ste. 1930**

**Chicago, IL 60604**