

Direct Wines, Inc., (hereafter “Direct Wines,” “we,” “us,” or “our”) offers programs, benefits, and applies to the URL, www.Laithwaites.com (the "Site"), and all other websites, social media pages, accounts owned by the Company (individually, and collectively, the "Websites"), and all mobile applications owned by the Company (together with the Websites, collectively, the "Company Sites"). other offerings to consumers related to the collection, retention, or sale of Personal Information that may be deemed a “financial incentive” or “price or service difference” under the California Consumer Privacy Act (“CCPA”) and “financial incentive” under the Colorado Privacy Act (CPA).

These financial incentives may include:

- Discounts, coupons, and special offers when you sign up for our email list, mobile messaging, and referral promotion, or participate in a limited-time or one-time marketing promotions.

These promotions may involve collecting the following Personal Information from customers who participate:

- First and Last Name,
- Email Address,
- Phone Number,
- Date of Birth (Age Gate necessity in association with the sale of alcohol)
- Inferences

We are providing you with this information so that you may make an informed decision on whether to participate in our programs, including our Referral Program, and Mobile Messaging.

- **Limited-Time Promotions:** From time to time, we may offer incentives limited to a specific time period. In exchange for your participation in these promotions, you may be offered a financial incentive, such a discount

Participation in a limited-time offer or promotion is governed by the applicable terms and conditions for the program, which will also describe any financial incentives associated with the promotion and how to participate. You can terminate participation at any time as will be explained in the program terms. The value of your Personal Information will be disclosed in the promotion terms.

- **One-Time Promotions:** In addition to the programs identified above, we may also offer you one-time percentage off coupons, discounts, or other promotions from time to time, such as when you provide us your email address or mobile phone number and agree to receive marketing messages in exchange for a one-time coupon. Including when you make a referral

for a one-time reward. Such offers may not be available at all times. The amount and terms of such offers will be presented to you at the time of the offer. You can terminate participation at any time by contacting us. Our good-faith estimate of the value of your Personal Information is the value of the benefit we offer to you. We have calculated such value by using the expense related to the benefit.

Each financial incentive or price or service difference related to submission and use of consumer personal information is based upon our good faith estimate of the value of such information, which takes into consideration, without limitation, estimates regarding (i) the ways in which we may use such information currently or in the future, (ii) the anticipated revenue which might be generated from the use of such information, (iii) the anticipated expenses which might be incurred in the collection, storage, and use of such information, as well as the overhead, marketing, and other expenses which might be incurred in the operation of our business, and (iv) anticipated future economic and market conditions and other relevant factors related to the estimated potential value of such information to our business.

By participating in any of the above promotional programs, you agree that the benefits are reasonably related to the value of the Personal Information collected and retained.

Participation in our promotional programs is always optional, and you can opt-out or unsubscribe from program participation at any time.

You can also contact us at

Phone:1-800-649-4637

Mail: Laithwaites

Attn: Customer Service

PO Box 7133

Port St. Lucie, FL 34985-9898

Email: customerservice@laithwaiteswine.com

EFFECTIVE DATE OF POLICY

This Privacy Policy is effective as of December 7, 2023.