

Political Action Campaign Privacy Policy

Updated: Effective January 1, 2023

Welcome to our political action campaign (the “**Campaign**,” “**us**,” “**we**,” or “**our**”) website, which is sponsored by ITG Brands, LLC. This Privacy Policy applies to your use of our political action websites (including www.votersfortobaccofreedom.org) and to other information we collect online (together, our “**Service**”). If you are an employee, job applicant, or if we collected your Personal Information in the context of your employment at another business and you have questions about how we use your Personal Information, please contact us as provided below.

Please read our Privacy Policy and Terms of Use carefully before using the Service. By using the Service or otherwise providing Personal Information to us, you agree to the Service’s [Terms of Use](#) and consent to our data collection, use, and disclosure practices, other activities as described in this Privacy Policy. If you do not agree, please discontinue use of the Service.

CONTENTS

- Personal Information We Collect and Why We Collect It
- How We Collect Your Personal Information
- How We Disclose Personal Information
- Social Features on Our Service
- Analytics
- Your Choices About Tracking and Communications
- Security and Passwords
- Age Restrictions
- Nevada Privacy Notice
- California Privacy Rights
- International Visitors
- Changes to This Policy
- How to Contact Us

PERSONAL INFORMATION WE COLLECT AND WHY WE COLLECT IT

“**Personal Information**” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you. Personal Information does not include information that is publicly available, de-identified, or aggregated.

The chart below summarizes the types of Personal Information we collect and why we collect it. We may use your Personal Information for any purposes not inconsistent with our statements under this Privacy

Policy, or otherwise made by us in writing at the point of collection, and not prohibited by applicable law, including the purposes listed below.

CATEGORY OF PERSONAL INFORMATION	EXAMPLES	PURPOSE(S) FOR COLLECTION
Contact Information and Identifiers	Real name, alias, account name, username, driver’s license number, signature, social security number, state identification number, postal address, unique personal identifier, online identifier, IP address, email address, or other similar identifiers	<p>To allow you to participate in the features we offer</p> <p>To maintain your accounts with us</p> <p>To communicate with you, including about our products, updates to our terms and policies, and to obtain your feedback</p> <p>To send you marketing materials and advertisements</p> <p>To recognize you when you use our services</p> <p>To show you relevant ads while you browse the internet or use social media</p> <p>To send you relevant coupons</p> <p>To allow you to participate in promotions, sweepstakes, contests, and rewards programs</p> <p>Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p> <p>For litigation and other legal and regulatory requirements</p>
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<p>To allow you to participate in the features we offer</p> <p>To provide you with appropriate products and recommendations</p> <p>To help you find relevant products more quickly</p> <p>To tailor our communications to you</p> <p>To provide customer service and support</p> <p>To send you relevant coupons</p> <p>To allow you to participate in promotions, sweepstakes, contests, and rewards programs</p>

		<p>To improve our services, and our products, marketing and advertising</p> <p>Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
Demographic Information	Age, birth date, gender, languages spoken, marital status, and racial or ethnic origin	<p>To allow you to participate in the features we offer</p> <p>To send you relevant marketing materials and advertisements</p> <p>To tailor our communications to you</p> <p>To improve our services, and our products, marketing and advertising</p> <p>Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p> <p>For litigation and other legal and regulatory requirements</p>
Internet or Other Electronic Network Activity Information	Internet or other similar activity, browsing history, search history, information on a consumer's interaction with a website, application logs, device data and registration, social media account information or advertisement	<p>To allow you to participate in the features we offer</p> <p>To provide you with appropriate products and recommendations</p> <p>To help you find relevant products more quickly</p> <p>To tailor our communications to you</p> <p>To provide customer service and support</p> <p>To send you relevant coupons</p> <p>To allow you to participate in promotions, sweepstakes, contests, and rewards programs</p> <p>To improve our services, and our products, marketing and advertising</p> <p>Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>

<p>Geolocation Data</p>	<p>Your physical location based on information you provide directly or inferred from your IP address</p>	<p>To allow you to participate in the features we offer</p> <p>To deliver coupons to you</p> <p>Auditing, research and analysis, to maintain and improve the Service, and for any other internal business purposes</p>
<p>Audiovisual Information</p>	<p>Audio recordings of customer care calls, video, or similar information</p>	<p>To provide you with customer service</p> <p>To improve our products and services</p> <p>For litigation and other legal and regulatory requirements</p>
<p>Communications with Us</p>	<p>The contents of your communications with us via phone, email, text message, chat, or other means (such as survey responses, product reviews, and comments on our blog and social media pages)</p>	<p>To communicate with you about our products and services, your orders, and to provide customer service and support</p> <p>To improve our websites, apps, products, and marketing</p> <p>To allow you to participate in our promotions, sweepstakes, contests, and loyalty programs</p> <p>To detect and prevent fraud against you and/or us</p> <p>For litigation and other legal and regulatory requirements</p>
<p>Inferences About You from Any Other Category of Information We Collect</p>	<p>Information reflecting your preferences, characteristics, trends, or attitudes</p>	<p>To provide you with appropriate products and recommendations</p> <p>To improve our services, and our products, marketing and advertising</p> <p>To provide you with a better website or app experience</p> <p>Auditing, research and analysis, to maintain and improve our services, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>

We may use and disclose Personal Information for any purpose if it is publicly available, de-identified, or aggregated with other information so that it can no longer identify you.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your Personal Information through various means, including when you directly provide it to us and automatically through your use of our Service. We may also collect Personal Information about you from our sponsors, vendors, and other parties. In some instances, you may be able to choose what information to provide, but sometimes we require certain information from you to use features of our Service.

Information that You Provide

We collect Personal Information about you directly when you:

- Sign up for our mail, email, and/or text message distribution list
- Enter search terms or other information through our Service
- Subscribe to receive our notifications
- Exchange communications with us by mail, email, phone, etc.
- Post comments to our online communities
- Connect with us via social media

Information Collected Automatically

The Campaign and/or our vendors also automatically collect certain information about you when you access or use the Service (“**Usage Information**”). Usage Information may include your IP address, device identifier, browser type, operating system, information about your use of the Service, and data regarding network connected hardware (e.g., computers or mobile devices), the domain name of the website that allowed you to navigate to the Service, search engines used, the length of time spent on the Service, the pages you looked at on the Service, the address (or “**URL**”) of the websites you visited before and after visiting the Service, the frequency of your visits to the Service, and certain other available information. The methods we use to collect Usage Information include:

- **Log Files.** Log information is data about your use of the Service, such as IP address, browser type, internet service provider, referring/exit pages, operating system, date/time stamps, and related data, which may be collected and stored in log files.
- **Cookies.** We use cookies and other tracking technologies (such as web beacons) to collect and store information about your interactions with our website, including information about your browsing behavior. Our website also supports cookies placed by our vendors, affiliates, and advertising partners.

Cookies are small files that a website transfers to your device through a web browser that enable the site’s or a vendor’s systems to recognize your device and to capture and remember certain information. Web beacons (also known as tracking pixels) are tiny graphics embedded invisibly on a webpage or in an email that may be used to deliver or communicate with cookies, to count users who have visited certain pages, and to understand usage patterns. In general, our website use cookies and other tracking technologies as follows:

- Where necessary to run our website, for example by allowing you to log in.
- To optimize the functionality of our website, including by personalizing content for you, greeting you by name and remembering your preferences (e.g., your choice of language or region).

- For analytics purposes—for example, to help us understand how our website is used and to see what topics most interest you. More information on website analytics is provided below.
- For purposes of ad targeting and marketing. These cookies collect information about your browsing behavior on our website in order to show you interest-based advertising when you visit other websites or use social media.
- To determine if you open or act upon our email messages. Information on unsubscribing from our commercial email communications is provided below.
- To obtain information about your interactions with our online advertisements, such as whether you clicked on an ad and the website where you may have seen the ad.

Cookies vary in how long they last. “Session cookies” terminate shortly after you terminate your internet session. “Persistent cookies” are stored on your device until a set expiration date. We use both session cookies and persistent cookies on our website.

- **Web Beacons (“Tracking Pixels”).** Web beacons are small graphic images, also known as “Internet tags,” “clear GIFs,” or “Pixel Tags”) embedded in web pages and email messages. Web beacons may be used, without limitation, to count the number of visitors to the Service, to place cookies, to monitor how users navigate the Service, and to count content and advertising views.
- **Embedded Scripts.** An embedded script is programming code designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from our web server, or from a vendor with which we work and is active only while you are connected to the Service and deleted or deactivated thereafter.
- **Location-Identifying Technologies.** Geo- filtering and other location-aware technologies may locate you, or make assumptions about your location, for purposes such as verifying your location and delivering or restricting/providing content based on your location. Content on our Service may be personalized based on various information we may have about you to try to provide you with more location-relevant content.
- **Device and Activity Monitoring.** Technologies that monitor, and may record, certain of your interactions with the Service, and/or collect and analyze information from your device, such as, without limitation, your operating system, plug-ins, system fonts, and other data, for purposes such as identification, security, fraud prevention, troubleshooting, tracking and/or improving the Service and customizing or optimizing your experience on the Service.

Information We Collect from Other Sources

We may also obtain information about you from other sources, including our vendors. We also may obtain your Personal Information from our sponsors, and from parent, subsidiary, and sister companies. In some circumstances, we obtain Personal Information about you from other

parties, including business partners, resellers, and data brokers, some of which may sell the information to us. To understand your rights and choices regarding Personal Information collected by other companies, please consult the privacy policies of the businesses that you interact with.

HOW WE DISCLOSE PERSONAL INFORMATION

We may disclose your Personal Information for any purposes not inconsistent with this Privacy Policy, our written statements at the point of collection, or applicable law. In general, we disclose Personal Information as follows:

- With our sponsors
- Within our group of companies including affiliates, subsidiaries, locations, etc.
- With our agents, vendors, consultants, and other business providers in order for them to provide their services to us. For example, we may disclose your Personal Information to provide customer service, operate and improve our business and the Service, improve our campaigns and customer service, help run our promotions (including coupons and rewards programs), process payments, perform auditing and quality control, communicate with you, and otherwise operate our business.
- With other parties for co-marketing purposes, to improve our campaigns, or to provide you with products and services that may interest you
- With our advertising partners for the purposes of ad targeting, remarketing, and customized advertising content
- As necessary, for the following purposes: (a) to comply with any legal process; (b) to respond to requests from public and government authorities; (c) to enforce our terms and conditions; (d) to protect our operations and protect our rights, privacy, safety, or property, and/or that of you or others; and (e) to allow us to pursue available remedies or limit the damages that we may sustain
- With our insurers and professional advisers for the purposes of managing risks, obtaining professional advice, exercising or defending against legal claims, etc.
- With other businesses in connection with or during negotiations of any reorganization, acquisition, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding)

SOCIAL FEATURES ON OUR SERVICE

Certain functionalities on the Service permit interactions that you initiate between the Service and certain other services, such as social networks (“**Social Features**”). Examples of Social Features include: enabling you to send content such as contacts and photos between the Service and another’s service; “liking” or “sharing” the Campaign’s content; logging in to the Service using your social media account (e.g., using Facebook Connect to sign-in to the Service); and to otherwise connect the Service to another service (e.g., to pull or push information to or from the Service). If you use Social Features, information you post or provide access to may be publicly displayed on the Service or by the social media service that you use. Similarly, if you post information on a social media service that references the Service (e.g., by using a hashtag associated with the Campaign or one of our brands in a tweet or status update), your post may be used on or in connection with the Service or otherwise by the Campaign and/or our affiliates. Also, both the Campaign and the social media service may have access to certain information about you and your use of the Service and any social media service.

ANALYTICS

Our website uses analytics technology provided by our vendors to understand how users interact with the site, improve our web experience, and improve our campaigns. Analytics services in use on our website include Google Analytics. These analytics services use cookies and other Tracking Technologies to collect information about how you use the Service. Personal Information collected by these analytics services (e.g., your IP address and other Usage Information) may be transmitted to and stored by these providers on servers in the U.S. (or elsewhere). See below for more information on your choices regarding analytics services.

YOUR CHOICES ABOUT TRACKING AND COMMUNICATIONS

Cookies and Tracking Technologies

Our website offers a cookie preference center that allows you to exercise your choices on these technologies. Cookies may also generally be disabled or removed by tools available as part of most commercial browsers, and in some instances blocked in the future by selecting certain settings. Browsers offer different functionalities and options, so you may need to set them separately. Please review your browser's Help menu for instructions, or visit www.allaboutcookies.org for more information. Please note that if you disable all cookies, some features of our Service may not function properly.

Do Not Track Signals

Your browser settings may allow you to automatically transmit a "Do Not Track" signal to online services you visit. Note, however, there is no consensus among industry participants as to what "Do Not Track" means in this context. Like many online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. We do, however, respond to the Global Privacy Control ("GPC") signal for California residents wishing to opt-out of the "sale" of their Personal Information. For more information, please see our [California Privacy Notice](#).

Analytics and Advertising Technologies

You may exercise choices regarding the use of cookies from Google Analytics by going to <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

You may choose not to receive some interest-based advertising by submitting opt-outs. Some of the advertisers and providers that perform advertising-related services for us may participate in the Digital Advertising Alliance's ("DAA") Self-Regulatory Program for Online Behavioral Advertising and/or the Network Advertising Initiative ("NAI"). To learn more about how you can exercise certain choices regarding interest-based advertising, including use of cross-device data for serving ads, visit <http://www.aboutads.info/choices/>. To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that opting out only means that those selected members should no longer deliver certain interest-based advertising to you but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks).

We also use advertising services provided by Google Ad Services, such as remarketing with analytics and interest-based ads. We may use first-party cookies or other first-party identifiers as well as third-party cookies or other third-party identifiers to, e.g., deliver advertisements, measure your interests, and/or personalize content. For more information on how Google Analytics uses data collected through our services, visit <http://www.google.com/policies/privacy/partners>. To opt out of Google Analytics cookies, visit <https://tools.google.com/dlpage/gaoptout> or download the Google Analytics Opt-Out Browser Add-On.

Depending on your device settings, you may also opt out of certain interest-based advertising through the device's "Limit Ad Tracking" or equivalent feature. Refer to your device for more information on what this opt out affects. For instance, you can adjust or reset the advertising identifiers on your mobile device in the device settings. iOS users can visit Settings > Privacy > Advertising > Reset Advertising Identifier. Android users can visit Google settings > Ads > Reset advertising ID.

In addition, we may serve ads on other online services that are targeted to reach people on those services who are also identified in one of more of our databases ("Matched List Ads"). This is done by using tracking technologies or by matching common factors between our databases and the databases of the other online services such as Facebook/Meta or Twitter. We are not responsible for these services, including without limitation the security of the data they hold about you. If we use Facebook to serve Matched List Ads on Facebook services, you should be able to hover over the box in the right corner of such a Facebook ad, or go to your account settings, to find out what options Facebook offers you to control such ads. If we use Twitter Matched List Ads, you should be able to review your ad options in your account settings on Twitter.

We are not responsible for the effectiveness of any other parties' opt-out options or the accuracy of their statements regarding their programs.

Email Communications

You may unsubscribe from our marketing email communications by clicking the "unsubscribe" link found in every commercial email we send, or by sending a request to unsubscribe to privacy@itgbrands.com. Unsubscribing from our marketing communications will not affect the level or quality of service we provide to you.

Text/SMS Messages

You have the choice to opt-in to receiving text messages and alerts on the mobile phone number(s) you provide to us. Once you opt-in, we may send you text messages (i) regarding our campaigns; and (ii) to investigate or prevent fraud. You do not have to opt-in to text messages and alerts to use and enjoy our Service. If you opt-in, standard text messaging charges may apply. You may choose to opt-out from our text messages and alerts at any time. To directly opt-out, send us a text message from your mobile phone with the word STOP, STOP ALL, END, QUIT, CANCEL or UNSUBSCRIBE, and we will unsubscribe you from text communications. If you opt-out, you will not receive any additional text messages via your mobile phone. For more information regarding our text messaging and alerts, please contact us at privacy@itgbrands.com or 1 (888) 342-6567.

SECURITY

We take commercially reasonable measures to protect Personal Information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Nevertheless, transmission via the internet and electronic storage are not completely secure, and we cannot guarantee the security of your Personal Information. If you suspect any unauthorized activity involving your Personal Information, please report that activity to us immediately.

AGE RESTRICTIONS

The Service is intended for adults not less than twenty-one (21) years of age. If you are under twenty-one (21) years of age, you are not permitted to use the Service and should not send any Personal Information to us. We do not knowingly collect Personal Information as defined by the Children's Online Privacy Protection Act ("COPPA"). If we learn that we collected Personal Information in a manner not permitted by COPPA, we will dispose of that information, or otherwise treat it, in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under the age of thirteen (13) has provided us with Personal Information, please contact us here.

NEVADA PRIVACY NOTICE

Nevada law allows residents to opt out of the sale of certain Personal Information, called “covered information.” The Campaign does not sell covered information as defined under Nevada law and we have no plans to change that practice. If you want to be notified if we do change that practice, you may submit your request at our Consumer Rights Request [webform](#).

CALIFORNIA PRIVACY RIGHTS

California residents can learn more about their privacy rights [here](#).

VIRGINIA PRIVACY RIGHTS

This section supplements other parts of this Privacy Policy and provides additional information for Virginia consumers, including how to exercise their rights under the Virginia Consumer Data Protection Act (“VCDPA”). All terms in this section are used as defined in the VCDPA.

Additional Information about Certain Data Uses

Targeted Advertising. We may process your Personal Data for targeted advertising. To opt out, please click [here](#).

Sales of Personal Data. We may sell your Personal Data. To opt out, please click [here](#).

Making a Privacy Rights Request

If you are a resident of Virginia, you have the right to submit certain requests relating to your Personal Data as described below. To exercise any of these rights, please submit a request through our [webform](#) or call us at 1 (888) 342-6567. Please note that we will need to authenticate your identity before your request can be processed. For authentication, you will be asked to log into your account or to provide two-to-three (2-3) pieces of Personal Data that we will match against our records.

Right to Access and Data Portability. You have the right to confirm whether we are processing your Personal Data, to access your Personal Data, and to obtain a copy of Personal Data you provided to us in a portable format.

Right to Correct. You have the right to request that we correct inaccuracies in your Personal Data, taking into account the nature of the Personal Data and our purposes for processing it.

Right to Delete. You have the right to request that we delete your Personal Data, subject to exceptions.

Right to Opt Out. You have the right to opt out of the following uses of your Personal Data: (a) targeted advertising; (b) the sale of Personal Data; and (c) profiling in furtherance of decisions that produce legal or similarly significant effects. _

Right to Appeal. Sometimes we are unable to process requests relating to your Personal Data, in which case, your request will be denied. If you are a resident of Virginia whose privacy rights request has previously been denied by us and you believe we denied it in

error, you may appeal for reconsideration of your request using our [webform](#) or by calling us at 1 (888) 342-6567.

Please note that if you make a privacy rights request, we will retain the Personal Data submitted in connection with your request for recordkeeping purposes.

INTERNATIONAL VISITORS

Our Service is directed solely to residents of the United States. If you access the Service from outside of the U.S., please be aware that Personal Information collected through the Service may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Service or provision of any Personal Information to us constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information in the U.S. as set forth in this Privacy Policy.

CHANGES TO THIS POLICY

By using our Service, you consent to the terms of this Privacy Policy and our Terms of Use. We may change our Privacy Policy from time to time. Your use of our Service indicates your consent to the privacy policy posted at the time of use.

On January 1, 2023, we changed our Privacy Policy to clarify the types of Personal Information we collect about you, the ways we collect your information, and how we use and disclose your information. We also updated the parts of our Privacy Policy that explain the rights of California, Nevada, and Virginia residents.

HOW TO CONTACT US

If you have any questions about this Privacy Policy, please contact us at privacy@itgbrands.com, by mail to 714 Green Valley Road, Greensboro, NC 27408-7018 (Attn: Legal Department), or toll-free by phone at 1 (888) 342-6567.