

Bolay Enterprises, LLC
Website Privacy Policy

Last updated: January 25, 2019

Bolay Enterprises, LLC (“we,” “us,” or “our”) are pleased to provide you with access to our Website. This Privacy Policy describes our practices with respect to the collection, transfer, manipulation, disclosure and other uses of Your Information and certain other information collected by us through our Website. For purposes of this Privacy Policy, “Your Information” means information about you which may be of a confidential nature and may include personally identifiable information, including your email address.

This Privacy Policy does not apply to information collected by us through mediums other than our Website, or to information collected by any person or entity other than us, even if related to our Website (such as a third-party website, content, application, that may link to or be accessible from or on our Website).

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING OUR WEBSITE. BY USING OUR WEBSITE, OR BY CLICKING TO ACCEPT OR AGREE TO OUR [TERMS OF USE](#) WHEN THIS OPTION IS MADE AVAILABLE TO YOU, YOU ACCEPT AND AGREE TO BE BOUND AND ABIDE BY OUR TERMS OF USE, INCLUDING THIS PRIVACY POLICY. IF YOU DO NOT WANT YOUR INFORMATION USED OR DISCLOSED IN THE MANNER DESCRIBED IN THIS PRIVACY POLICY, OR IF YOU DO NOT AGREE WITH ANY TERM OR CONDITION IN THIS PRIVACY POLICY OR OUR [TERMS OF USE](#), THEN YOU MUST NOT ACCESS OR USE OUR WEBSITE OR SUBMIT YOUR INFORMATION TO US.

This Privacy Policy may change from time to time (see “Changes to our Privacy Policy”). Your continued use of our Website after we make changes is deemed to be acceptance of those changes, so please check this policy periodically for updates.

Capitalized terms used in this Privacy Policy but not otherwise defined have the meanings ascribed to them by the [Terms of Use](#).

1. Children Under the Age of 13

Our Website is intended to be accessed and used only by adults and are not directed to minors. If you are below the age of 18, you may access and participate in our Website only under the supervision of a parent or legal guardian who agrees to be bound by this Privacy Policy and our [Terms of Use](#). We do not knowingly collect personally identifiable information by anyone under the age of 13 and you should not provide us with any information regarding any individual under the age of 13. If we learn that we have inadvertently gathered information from anyone under the age of 13, we will take reasonable measures to promptly remove that information from our records.

2. What Information We Collect and How We Collect It

We receive and collect several types of information about you, such as the information described below.

Information you provide to us: From time to time, you may provide us with certain information, including Your Information or information of third parties. Instances where you may provide this information include when you create, manipulate or update accounts on or through our Website, fill out forms or fields on or through our Website, or sign up for any promotions or to receive newsletters or other materials about our Website or those of third parties. By way of example, when you order food online from us, apply for a job with us, or purchase one or more products from us, you may provide your first and last name, card payment information, billing information, e-mail address, and other information.

Information we receive from third parties: We may obtain information about you from sources other than you, such as from our Third-Party Providers and our business partners. The information that we will receive depends on the third party and your privacy settings with that third party. For example, when ordering our food online, when applying for a job or purchasing our products, our Third-Party Providers will collect certain information from you,

often including Your Information, and will share that information with us. All information that you disclose to third parties will be subject to the privacy policies and practices of such third parties. You should review the privacy policies and practices of such third parties prior to disclosing information to them.

Information we collect through automatic data collection technologies: We and third parties acting on our behalf may use various technologies to collect and store information when you use our Website, including sending cookies, web beacons, pixel tags or other anonymous identifiers to your device, or otherwise tracking your activities on our Website over time. “Cookies” are pieces of data stored on a computer, mobile phone or other device. A “web beacon” is a type of technology that lets us know if you visited a certain page or whether you opened an email. A “pixel tag” is a type of technology placed within a website or e-mail for the purpose of tracking activity, which is often used in combination with cookies. Other “anonymous identifiers” include, without limitation, random strings of characters used for the same purposes as cookies, web beacons or pixel tags, such as with mobile devices where cookie technology may not be available. These technologies help us know that you are logged on to or using our Website, provide you with features based on your preferences, help us understand when and how you are interacting with our Website and compile other information regarding your use of our Website. We also may use these technologies to collect information about your online activities over time and across third-party websites or other online Website (a practice known as behavioral tracking).

The information collected through these technologies, standing alone, cannot be used to determine your identity. Such information may, however, be combined in a way that makes it become personally identifiable information (i.e., information that can identify you). For example, we may tie this information to personal information about you that we collect from other sources or that you provide to us. If this happens, we will treat the combined information as personally identifiable information.

It may be possible to disable some (but not all) Cookies or automatic data collection technologies through your device or browser settings, but doing so may affect the functionality of our Website. The method for disabling Cookies or other automatic collection technologies may vary by device and browser, but can usually be found in preferences or security settings. For example, iOS and Android devices each have settings which are designed to limit forms of ad tracking.

To make a do-not-track request with respect to behavioral tracking on this Website or to receive information on how and how we respond to web browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking, please contact us at info@bolay.com or in writing at:

Bolay Enterprises, LLC
Attention: Admin Department
625 N. Flagler Drive, Suite 1000
West Palm Beach, FL 33401

In contacting us, you must include the reference to our “Privacy Policy” on the subject line and in the body of the message and include the email address or mailing address, as applicable, for us to send our response. We reserve the right not to respond to inquiries submitted other than to the address specified above.

Our Collection Practices with Respect to Certain Specific Information:

General Use and Preference Information. We may collect, receive and store information regarding your general use of our Website (such as details of how and when you used our Website, interactions with our Website, log in information, resources that you access, your Internet protocol address, your browser type and your device type), as well as your preferences.

Device Information. When you access or use our Website through your computer, mobile phone or other device, we may collect information regarding and related to your device, such as hardware models and IDs, device type, operating system version, the request type, the content of your request and basic usage information about

your use of our Website, such as date and time. In addition, we may collect information regarding application-level events, such as crashes, and associate that temporarily with your account (if any) to provide customer service. We may also collect and store information locally on your device using mechanisms such as browser web storage and application data caches.

Location Information. If you submit your zip code or other geographic information to us, you may provide us with your location information. Furthermore, if you enable the collection of location information on your device, then we may collect information about your actual location, such as your mobile device's GPS coordinates. We may also use other technologies to determine your location (such as through the location of nearby Wi-Fi access points or cell towers), or obtain your location information from third parties.

Third-party content providers may collect information: Some content or applications, including advertisements, on our Website may be served by third-parties, including advertisers, ad networks and servers, content providers and application providers. These third parties may collect information about you when you use our Website using cookies alone or in conjunction with web beacons or other tracking technologies. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. Please note that the information collected by these third parties may be associated with Your Information and that these third parties may collect information, including Your Information, about your online activities over time and across different websites and other online Websites.

3. How We Use Your Information

We may use the information we collect for various lawful business purposes. Among others, these purposes may include using this information, including Your Information, to:

- *Present our Website, products and related content to you.* For example, if you provide us with your contact information for purposes of receiving newsletters, emails, promotional materials or other information or content from us, we will use the information you provide us to send you such information or materials.
- *Contact you and provide you with information.* For example, we might contact you via e-mail or other communications to provide you with Website or service offering updates, promotions, offers, personalized information and other information from us or our Third-Party Providers or business partners or to respond to comments, inquiries, job applications, and other information submitted by you.
- *Analyze, improve and manage our Website, products, service offerings and operations.* For example, we might obtain feedback regarding our Website, products, and service offerings, understand and anticipate your needs and preferences, better understand your use of our Website or products or service offerings, customize and tailor Website content and advertising, improve our marketing and promotional efforts, engage in statistical analysis and provide feedback or information to our business partners, vendors, advertisers and other third parties.
- *Resolve problems and disputes, and engage in other legal and security matters.* For example, we may use the information we collect to comply with, monitor compliance with and enforce this Privacy Policy, our Terms of Use (including any terms and conditions incorporated or referenced in our Terms of Use) and any other applicable agreements and policies, meet other legal and regulatory requirements, and protect the security and integrity of our Website. We might also use information that we collect to investigate any complaint you make regarding our Website, content, products, service offerings or other related matters, to provide evidence in any dispute or anticipated dispute between you and us, or to prevent fraud or other criminal or otherwise inappropriate activities.
- *Display advertisements to our advertisers' target audiences.* Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria. Note also that our third party content providers may use information they collect via our Website to provide you with interest-based (aka behavioral) advertising or other targeted content.

- *Comply with a request from you in connection with the exercise of your rights.* For example, where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists to be able to comply with your request.
- *Other Purposes.* We may also use your information in other ways. To the extent required by applicable law, we will provide notice at the time of collection and obtain your consent.

4. How We Disclose Your Information

General Disclosure of Your Information: We may disclose the information we collect, including Your Information:

- to our affiliates and their respective employees, agents and representatives involved in delivering our Website, products and other services to you;
- to any person who, in our reasonable judgment, is authorized to receive Your Information as your agent, including as a result of your business dealings with that person (for example, your attorney);
- to our third-party vendors or suppliers (including our Third-Party Providers) so that they may provide support for our internal and business operations, including for the handling of the purchase and sale of our products, data processing, data verification, data storage, surveys, research, internal marketing, delivery of promotional, marketing and transaction materials and our Website's maintenance and security;
- to fulfill the purpose for which you provide it;
- to third parties when you engage in certain activities through our Website that are sponsored by such third parties, such as purchasing products or services offered by a third party, applying for a job, electing to receive information or communications from a third party or electing to participate in contests, sweepstakes, games or other programs sponsored, in whole or in part, by a third party;
- to third parties that are interested in contacting you or providing offers to you that may be related to our Website or to products or services you may find of interest;
- as required by applicable law or ordered by a court, regulatory or administrative agency;
- as we deem necessary, in our sole discretion, if we believe that you are violating any applicable law, rule, restriction or regulation, or are otherwise interfering with another's rights or property, including our rights or property;
- if requested by authorities in the event of any act instance of local, regional or national emergency;
- to enforce our Terms of Use, including this Privacy Policy, and any other applicable agreements and policies;
- with your consent;
- to otherwise enforce or protect our rights; and
- in connection with a Business Transfer (see "Other Disclosures by Us" below).

Please note that the list above is not exhaustive and that we may, to the extent permitted by applicable law, in our sole discretion, share, loan, rent, sell or otherwise disclose the information we collect to third parties at any time, for any lawful purpose, without notice or compensation to you.

When we disclose the information we collect to third parties, such information will become permanently subject to the information use and sharing practices of the third party, and the third party will not be restricted by this Privacy Policy with respect to its use and further sharing of such information. Furthermore, these third parties may further disclose, share and use this information. By submitting information (including Your Information) to us, you expressly consent to such disclosure and use of such information. If you do not want this information (including Your Information) shared as described above, then you should not provide us with such information.

Other Disclosures by Us:

Aggregation and De-Personalization. We may use and disclose any de-identified information for any lawful purpose, including for any commercial purpose. De-identified Information means Information that does not identify you, including any identifiable information de-identified by either by combining it with information about others, for example, by aggregating your information with information about other persons, or by removing characteristics, such as your name, that make the information personally identifiable to you.

Business Transfers. We may disclose, lease, sell, assign or transfer the information we collect (including Your Information) to third parties in connection with a Business Transfer. A “Business Transfer” means a sale, acquisition, merger, consolidation, reorganization, bankruptcy or other corporate change involving us, even if the Business Transfer is only being contemplated and regardless of whether the Business Transfer relates to a part of or our whole business. Nothing in this Privacy Policy is intended to interfere with our ability to transfer all or part of our business, equity or assets (including our Website) to an affiliate or independent third party at any time, for any lawful purpose, without notice or compensation to you.

Circumvention of Security Measures: We use a certain technical, administrative and organizational security measures to keep Your Information safe. However, despite our efforts, please be aware that methods of transmission and electronic storage are not completely secure. We cannot guarantee the privacy or security of Your Information, as third parties may unlawfully intercept or access transmissions or electronic storage. Further, to the extent permitted by law, we are not responsible for circumvention of any privacy settings or security measures of our Website. Therefore, you use our Website at your own risk, you should not expect that Your Information will always remain private, and we do not guarantee the performance or adequacy of our security measures. In the event that an unauthorized third party compromises our security measures, to the extent permitted by law, we will not be responsible for any damages, directly or indirectly, caused by an unauthorized third party’s ability to view, use or disseminate Your Information.

5. Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding our collection, use and disclosure of the information that we collect. Below are some mechanisms that provide you with control over such collection, use or disclosure:

- *Cookies.* If you do not wish us to collect cookies, you may set your browser to refuse cookies, or to alert you when cookies are being sent. If you do so, please note that some or all parts of our Website may then be inaccessible or may not function properly.
- *E-mail Offers.* If you do not wish to receive e-mail offers or other information or communications from us, you can opt-out of receiving such e-mail offers or other information or communications from us (other than e-mails or other information or communications related to the completion of your registration, correction of user data, change of password and other similar communications essential to your transactions on or through our Website) by using the unsubscribe process at the bottom of the e-mail. Please be aware that it can take up to 15 business days to remove you from our marketing e-mail lists. If you opt-out from receiving our marketing e-mails, you may continue to receive confirmation and shipping status e-mails.
- *Managing Your Information.* If a portion of our Website allows you to create an account with us, then you can review and update Your Information by logging into that portion of our Website, visiting your account profile page and making changes.
- *Online Behavioral Advertising.* Certain third-party advertising networks that deliver behavioral advertising are members of the Network Advertising Initiative (“NAI”). You can prevent NAI member companies from collecting preference data about you by visiting <http://www.networkadvertising.org/choices/> and following the NAI’s directions. Note that if you opt-out through the NAI, you will still receive advertising. In addition, if you opt-out through the NAI and later delete your cookies, use a different browser or buy a new computer, you will need to renew your opt-out choice.

6. Information that You Disclose to Third Parties

Our Website, as well as the e-mail messages sent with respect to our Website, may contain links or access to websites or Website operated by third parties that are beyond our control. Links or access to third parties from our Website is not an endorsement by us of such third parties, or their respective websites, applications, products, Website or

practices. We are not responsible for the privacy policies, terms and conditions, practices or the content of such third parties. All information that you disclose to such third parties will be subject to the privacy policies and practices of such third parties. You should review the privacy policies and practices of such third parties prior to disclosing information to them. If you have any questions about how these third parties use your information, you should review their policies and contact them directly.

7. Operation of our Website in the United States

Our Website is operated in the United States. As a result, the information we collect (including Your Information) will be used and disclosed as described in this Privacy Policy in the United States, as well as in other countries if you access our Website outside of the United States. In some cases, the laws of countries other than the United States regarding our use and disclosure of your information may be less stringent than the laws of the United States.

8. Changes to Our Privacy Policy

We may amend this Privacy Policy at any time and from time to time. Amendments will take effect immediately upon us posting the updated Privacy Policy on the Website. Accordingly, you are encouraged to revisit this Privacy Policy from time to time in order to review any changes that we have made. The date on which this Privacy Policy was last updated will be noted immediately above this Privacy Policy.

9. Contacting Us

If you have any questions, suggestions or complaints regarding our use or disclosure of the information we collect from you or wish to contact us to make a request regarding such information (including Your Information), please contact us at info@bolay.com or in writing at:

Bolay Enterprises, LLC
Attention: Admin Department
625 N. Flagler Drive, Suite 1000
West Palm Beach, FL 33401

In contacting us, you must include the reference to our "Privacy Policy" on the subject line and in the body of the message and include the email address or mailing address, as applicable, for us to send our response. We reserve the right not to respond to inquiries submitted other than to the address specified above.