

LEGACYSECURE INC. Privacy Policy

Last updated and Effective July 8, 2021

This Privacy Policy discloses the information practices of LEGACYSECURE INC. ("LEGACYSECURE," or "we," "our," or "us") when you visit LEGACYSECURE's <https://legacysecure.tech> website (the "Site"). For purposes of this Privacy Policy, "LEGACYSECURE" means and includes LEGACYSECURE INC. and its affiliates and subsidiaries and its and their investors, officers, directors, employees, agents, representatives and assigns. We encourage you to read this Privacy Policy carefully. Terms not defined in this Privacy Policy shall have the meaning set forth in LEGACYSECURE's Terms of Service. By accessing, viewing, and/or using the LEGACYSECURE Services and the Site, each user (individually, "User" or "you" and collectively, "Users") understands and agrees to the privacy practices contained herein. If you object to anything in this Privacy Policy or LEGACYSECURE's Terms of Service or otherwise do not understand or agree to be bound by this Privacy Policy or LEGACYSECURE's Terms of Service s do not use the LEGACYSECURE Services and exit immediately.

The Privacy Policy applies to information collected: on this Site, any electronic communications between You and the Site (such as email or other electronic communications), and any other third-party sites that contain links to the Site.

1. Interpretation and Definitions

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

Definitions

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Company** (referred to as either "the Company", "LEGACYSECURE" "We", "Us" or "Our" in this Agreement) refers to LEGACYSECURE INC., 1273 north avenue building 5 apt 5d new Rochelle, NY 10804.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual as its defined by the General Data Protection Regulation ("G.D.P.R.).
- **Service** refers to the Website.

- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **Manufacturer** refers to the Company providing the product that is subject to authentications utilizing LEGACYSECURE's Near Field Communication Chips.
- **Website** refers to LEGACYSECURE's URL, accessible from <https://legacysecure.tech>
- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

2. Security.

The security of your Personal Data is important to us. However, no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

3. Notice of Privacy Policy Changes.

LEGACYSECURE may update this Privacy Policy to reflect changes to information practices. If any material changes are made, Users will be notified by e-mail (sent to the e-mail address provided) or by means of a notice on the LEGACYSECURE Services prior to the change becoming effective. Users are encouraged to review this page upon each visit to the LEGACYSECURE Services for the latest information on LEGACYSECURE's information practices.

4. Data Collection, How it is Collected and Why it is Collected

In this Privacy Policy, we refer to any information that can uniquely identify an individual (including the information below) as "Personal Data". We collect data that helps You determine the authenticity of the product You purchased. LEGACYSECURE uses the data it collects from the end user verification solution (which occurs when You scan the cigar or product label) to provide analytics to the Manufacturer of the product to provide insights into when and where Products have been scanned.

a. Data Collected by LEGACYSECURE

This system does not have a user login account for end-users of LEGACYSECURE's end-user verification solution. LEGACYSECURE has NO user accounts and, therefore, end user's access LEGACYSECURE's end-user verification through a URL that does not collect or request additional Personal Data from You.

Device ID. LEGACYSECURE collects Personal Data when You scan the smartlabel located on the cigar or product.

How Will We Use Device ID Data. LEGACYSECURE will use Device ID data in order to distinguish users that have previously voted on a product in the ratings system from users that have not previously voted on product in the rating system.

Geolocation. LEGACYSECURE collects location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. Note however, if you choose to opt out, you may not be able to use certain aspects of the Services.

How Will We Use Geolocation Data. We use this information to provide features of Our Service; to improve and customize Our Service.

How do we collect Data: LEGACYSECURE collects Personal Data when You scan LEGACYSECURE's smartlabel located on the cigar or other product with the smartlabel affixed to the product.

Legal Basis. If you are an individual in the European Economic Area (EEA), The legal basis for the processing of the email newsletter Personal Data when using the offered contact options is your consent according to Art. 6(1)(a) of the GDPR. You can revoke your consent at any time.

b. Usage Data

What Usage Data Do We Collect. LEGACYSECURE collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request.

What Will We Do with Usage Data. LEGACYSECURE's purpose in collecting non-personally identifying information is to better understand how LEGACYSECURE visitors use its website. LEGACYSECURE also collects this data to improve site user interface, content personalization, conduct A/B testing and optimize sales and marketing content. A/B testing and personalization A/B tests, content personalization, improving site user interface, optimizing sales and marketing content Marketing automation sending marketing materials relevant to your interests Retargeting displaying our advertisements on other websites

5. **Where Does LEGACYSECURE Store Data.** LEGACYSECURE maintains all data hosted with a cloud service providers. In some cases, analytical data may be stored with our cloud analytics service providers.

6. Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, provide customer support, provide customer service and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

As part of this Privacy Policy, we will always state the legal basis on which we base the processing of your Personal Data.

7. Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

8. Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

9. **Protection of Children's Privacy.** This Site and its Services and Products are not developed for or directed at children. Therefore, LEGACYSECURE does not intend to collect information from individuals under 13 years of age. If it is discovered that LEGACYSECURE has inadvertently collected information from an individual not meeting these requirements, LEGACYSECURE will promptly take all reasonable measures to delete that data from databases and systems.

Moreover, LEGACYSECURE does not intend to collect information from individuals under 21 years of age. If it is discovered that LEGACYSECURE has inadvertently collected information from an individual not meeting this requirement, LEGACYSECURE will promptly take all reasonable measures to delete that data from databases and systems.

10. **Do Not Track Signals.** Please note that because there is no consistent industry understanding of how to respond to “Do Not Track” signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

11. **Sharing Personal Information. Information Sharing.**

LEGACYSECURE shares analytical data, which includes with the manufacturers of the products we showcase in the End User Verification system. All shared data is anonymized and contains no personal data or any data to identify an individual such as (IP address or user tracking Ids set by our systems.). The shared analytical data is part of our core offering for End User Verification. The Analytic Data provides paying cigar manufacturers and other Companies regarding how, when and where their products are used.

LEGACYSECURE will disclose User Information to third parties only in the ways and for the purposes that are described in this Privacy Policy, LEGACYSECURE’s Terms of Service. LEGACYSECURE may disclose User Information in LEGACYSECURE's sole discretion: (a) to third parties that provide services on behalf of LEGACYSECURE and/or in connection with the LEGACYSECURE Services; (b) if required or permitted pursuant to any applicable law, regulation, or court or administrative order; (c) in connection with any User's violation of or to otherwise enforce LEGACYSECURE's rights under the Terms of Service or other agreements with LEGACYSECURE; (d) to protect the property of LEGACYSECURE; or (e) to protect the personal safety and/or rights of employees of LEGACYSECURE, other Users, or members of the public. Further, and notwithstanding anything herein to the contrary, LEGACYSECURE may transfer, sell and/or distribute User Information to third parties: (a) for the satisfaction of any debt or upon liquidation of LEGACYSECURE should such a situation arise; (b) to a purchaser or transferee of all or a portion of LEGACYSECURE's assets in conjunction with the sale or transfer of such assets; and/or (c) with the exception of protected health information, at or for any other purpose in LEGACYSECURE's sole discretion.

We share your Personal Data with service providers to help us provide our services and fulfill our contracts with you, as described above. For example:

- We may share your Personal Data to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.
- We may share Your Personal Data in the following situations:

With Service Providers: We may share Your Personal Data with Service Providers to monitor and analyze the use of our Service, to contact You.

For business transfers: We may share or transfer Your Personal Data in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.

With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

With other users: when You share Personal Data or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.

With Your consent: We may disclose Your Personal Data for any other purpose with Your consent.

13. Behavioral Advertising.

- **Web Beacons.** Small electronic files, known as web beacons, may be contained on the Site and our emails. Web beacons permit LEGACYSECURE to perform tasks such as count users who have visited the Site's pages, used screens, or Users who have opened emails and for other Website statistics, records level of User engagement with the Site and verifies the Site's system integrity.
- LEGACYSECURE also displays our advertisements on other websites.

14. Cookies

To enrich and perfect your online experience, LEGACYSECURE INC. uses "Cookies" similar technologies and services provided by others to display personalized content, appropriate advertising and store your preferences on your computer.

Cookies or Browser Cookies. A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

How do we use Cookies. LEGACYSECURE creates cookies within its application. We share information about your use of the Site and your interaction with our ads on other websites with our advertising partners. We collect and share some of this information directly with our advertising partners, and in some cases through the use of cookies or other similar technologies (which you may consent to, depending on your location).

What types of cookies do we use.

- **Analytic Tracking.** cookies to identify new users from returning users' Data cookies to store user preferences such as preferred time zone and Imperial vs Metric.
- **Storing the Cookies Data.** We are following standard practice. Without cookies a user would have to log into a website every time they access a new page. Rather than requesting login every time a webpage is accessed. An authentication cookie is set and automatically sent to the server and verified on each page load.
- **How to manage your cookies.** You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

Legal Basis. The legal basis for the processing data by means of cookies is Art. 6(1)(f) of the GDPR.

For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by:

- **GOOGLE** - <https://www.google.com/settings/ads/anonymous>
Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

15. Tracking Technology

Currently any tracking is used for analytical data, to help improve our applications, target users for advertising, and provide analytical feedback to our customers about their products.

16. Who is Processing Data. We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data on our behalf about how you interact with our Services over time. This information may be used to,

among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes. We have contracts in place with our data processors, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

Data may also be processed by our contracted service providers.

17. Your Rights under the CCPA. If you are a resident of California, you have the right to access the Personal Data we hold about you (also known as the ‘Right to Know’), to port it to a new service, and to ask that your Personal Data be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information below.

If you would like to designate an authorized agent to submit these requests on your behalf, please contact us at the address below.

When you make a request for LEGACYSECURE to delete personal information, LEGACYSECURE deletes the information as explained in this policy.

19. Transferring Data Internationally. We may transfer Data LEGACYSECURE has collected from You to third party data processors located in countries outside of the European Economic Area (“EEA”). LEGACYSECURE will comply with the applicable law regarding transfer of Personal Data. By using the Site, You consent to transfer of Your Personal Data to third party data processors located in countries outside of the European Economic Area (“EEA”).

20. Your Data Subject Rights under the General Data Protection Regulation (“GDPR”):

1. You have the right to be informed. Anyone processing your Personal Information or Personal Data must clearly state what they are processing, why they are processing and who else the data may be passed to.
2. The right to access. You have the right to view what data is held about you by a Data Controller.
3. The right to rectification. You have the right to have Your data corrected or amended if the data being held is inaccurate in any way.
4. The right to erasure also known as The Right to be Forgotten. You may request that Your Personal Data be deleted in certain circumstances. If Your Personal Data is no longer required for the purpose it was collected for, or Your Personal Data has been unlawfully processed.
5. The right to restrict processing. The Data Subject has the right to ask for a temporary halt to processing of Personal Data, such as in the case where a dispute or legal case has to be concluded, or the data us being corrected.

6. The right to data portability; a Data Subject has the right to ask for any data supplied directly to the Data Controller by him or her, to be provided in a structured, commonly used, and machine-readable format.
7. The right to object; the Data Subject has the right to object to further processing of their data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.
8. Rights in relation to automated decision making and profiling; Data Subjects have the right not to be subject to a decision based solely on automated processing.

You may exercise your rights at any time by:

- 1) contacting us at email address: privacy@legacysecure.tech
- 2) Calling the following telephone number: (914) 500 5349
- 3) Sending mail to the following address: 1273 North Avenue, Bldg 5, Apt. 5D New Rochelle, NY 10804

How to Contact the Appropriate Authority

According to Art. 13 (2) GDPR, you have the right to complain to a supervisory authority.

Should you wish to report a complaint of if you feel that LEGACYSECURE has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office ("ICO") by using the link directly below or the ICOs helpline.

<https://ico.org.uk/make-a-complaint/>

Contact: 0303 123 1113.

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at privacy@legacysecure.tech or by mail using the details provided below:

LEGACYSECURE INC., 1273 North Avenue, Bldg. 5, Apt. 5D

Phone: (914) 500-5349

Last updated: July 8, 2021

Consent. By using the LEGACYSECURE Services on the Site, You consent to LEGACYSECURE's collection, storage, analysis, use and disclosure of User Information as set forth in this Privacy Policy and LEGACYSECURE's [Terms of Service](#).