



## PRIVACY POLICY

Last Changes to Privacy Policy: July 2017

### INTRODUCTION

During use of the GHOST Vapes website (www.ghostvapes.com or any other website operated by Ghost, (including any versions optimized for viewing on a wireless or tablet device); hereafter “the Website”) and the GHOST Vapes app (“the App”), or by email communication, you (“You” or “the User”) may provide to Ghost Vapes (“Ghost” or “we” or “us”) personal information. It is important that you are aware how we may use this information.

Please be advised that the practices described in this Privacy Policy apply only to information gathered online through the Website and the App. It does not apply to information that you may submit to us offline or by companies or organizations to which we may link or who may link to us.

By using the Website and the App, you are accepting the practices described in our Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Website or the App. We reserve the right to modify or amend the terms of our Privacy Policy from time to time without notice. Your continued use of the Website and/or the App following the posting of changes to these terms will mean you accept those changes. If we intend to apply the modifications or amendments to this Privacy Policy retroactively or to personal information already in our possession, we will provide you with notice of the modifications or amendments.

If you have any questions about this Privacy Policy or don’t see your concerns addressed here, you should contact us here.

### INFORMATION COLLECTED

We collect two basic types of information from you in conjunction with your use of the Website and the App, personal information and non-personal information. Personal information is information that you supply to us, as described more fully below, i.e., when you use the Website and/or the App, order a product, complete a survey, register on the Website or the App, upload content, participate in a community, or provide your e-mail address. Personal information is any information that can individually identify you and includes, among other things, your name, e-mail address, telephone number, postal address, credit card, billing and contact information. Non-personal information includes information that does not personally identify you, but it may include tracking and usage information about your location, demographics, use of the Website, the App and the Internet.

#### Personal Information

As a general matter, you can browse the App and/or the Website without submitting your personal information to us. However, there are a number of circumstances in which you may supply us or our agents with your personal information. The following lists the most common ways in which we may collect your personal information.

- Registration for an account on the App or the Website
- Making a purchase on the Website



- Profile information that You provide for Your user profile
- Uploading or submitting content to the App and/or the Website
- Submitting an application to work at Ghost
- Participation in surveys
- Participation in our affiliate and referral programs
- Registration to receive alerts or other information via email, text or instant message from Ghost
- Request for sales calls, customer service, support requests or other assistance
- App or Website related communications, e.g. account verification; technical notification
- Submission of content or other data and information on any part of the App or Website that permits it
- Any other place on the App or Website where you knowingly volunteer personal information

### **Non-Personal Information**

In addition, when you interact with the App and the Website, we may collect certain information that does not identify you individually and our servers may automatically keep an activity log of your use of our App and/or Website (“Non-Personal Information”). Generally, we collect and store the following categories of Non-Personal Information:

Non-identifiable demographic data such as age, gender, and five digit zip code as part of collecting personal information

Device information about your computer, browser, mobile device, or other device that you use to access the App and Website. This information may include IP address, geolocation information, unique device identifiers, browser type, browser language, and other transactional information.

Analytics and usage information about your use of the App and/or Website.

Additional “traffic data” and log files such as time of access, date of access, software crash reports, session identification number, access times, and referring addresses.

Other non-personally identifiable information regarding your use of the Website and/or App.

### **Collection of Your Source IP Address/Location Information**

We may collect and store location information about you on the App and/or Website and associated with your account that you volunteer on the App and/or Website or enable through the App and/or Website or your device. We will not collect any location information that you do not volunteer or enable. We will delete any location information that you request is deleted. We do collect and store your device’s source IP address which may disclose the location of your device at the time you access the App and/or Website.

### **Collection of third-party Personal Information Through Refer-A-Friend Feature**

We may from time to time conduct a referral service to introduce people you know to our products. If you choose to use our referral service to tell someone about our App and/or Website or a discount on our products, we will ask you for your contact’s name and email address. We will automatically



send your contact a one-time communication inviting him or her to visit our App and/or Website. We store this information for the purpose of sending this one-time email and tracking the success of our referral program. Your contact may contact us at [info@ghostvapes.com](mailto:info@ghostvapes.com) to request that we remove this information from our database.

## **USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES**

Like many apps and websites, we use “cookies”, which are small text files that are stored on your computer or equipment when you visit certain online pages that record your preferences and actions. We may also use cookies to monitor traffic, improve the App and/or Website and make it easier and/or relevant for your use. Like many apps and websites, we use cookies, web beacons and similar technologies to record your preferences, track the use of our App and/or Website and your exposure to our advertisements. If you delete your cookies or if you set your browser or device to decline these technologies, some features of the App and/or Website may not work or may not work as designed.

We use both “session” cookies and “persistent” cookies. We do not use flash cookies, web storage, web beacons or other technology that tracks your browsing history across multiple websites or apps.

We use cookies for the other purposes set out below:

- We use cookies to remind us who you are and to find your account information in our database when you access a service so you do not need to log in at every visit. This helps us to provide you with service tailored to your specific needs and interests. A cookie is created when you register for a service
- We use cookies to determine the browser the visitor uses so the App and/or Website can be designed to work properly with the most common versions of different browsers
- We use cookies in conjunction with sending you e-mail newsletters
- Advertisers that place ads on the App or Website may use cookies
- We use cookies in conjunction with analysis of your use of our App and/or Website and generate analytics regarding our App and/or Website (including without limitation using third-party cookies placed by our analytics services)
- We use cookies to estimate our audience size. Your browser is given a unique cookie that helps us determine whether yours is a repeat visit or a first visit

We may partner with third-party advertising companies to better provide advertisements about our goods and services that may be of interest to you. These third-party advertisers may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use the App and/or Website. They may collect information about your online activities over time and across different App and/or Website and other online services. They may use this information to provide you with interest-based advertising or other targeted content. These online advertising partners do not have access to or use your name, address, e-mail address,



telephone number or other personally identifiable information from us, without your consent. They may, however, use persistent identifiers to anonymously track your Internet usage across other apps and websites in their networks beyond our App and/or Website. While we restrict their further use of such information, such third parties may, with sufficient data from other sources, be able to personally identify you, unknown to us.

Similarly, you can learn about your options to opt-out of mobile app tracking by certain advertising networks through your device settings. For more information about how to change these settings for Apple, Android or Windows devices, see:

Apple: <http://support.apple.com/kb/HT4228>

Android: <http://www.google.com/policies/technologies/ads/>

Windows: <http://choice.microsoft.com/en-US/opt-out>

Please note that opting-out of advertising networks services does not mean that you will not receive advertising while using our App and/or Website or on other apps and websites, nor will it prevent the receipt of interest-based advertising from third parties that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms.

Your browser or device may include “Do Not Track” functionality. Because a “Do Not Track” compliance protocol has not yet been finalized, GHOST Vapes’ information collection and disclosure practices, and the choices that we provide to customers, will continue to operate as described in this privacy policy, whether or not a Do Not Track signal is received.

## **HOW DO WE USE YOUR INFORMATION?**

We use the information we learn from you to help us personalize and continually improve your experience on the App and/or Website. We may use your Personal and Non-Personal Information in the following ways:

### **General Uses**

- To facilitate your purchase of our products
- To upload your content to our App and/or Website as you request
- To permit you to update, edit, and manage your content or orders on our App and/or Website
- To communicate with you about your account or transactions with us (including service related announcements) and send you information about features and enhancements on our App and/or Website
- To communicate with you about changes to our policies
- To personalize content and experiences on our App and/or Website, including providing you reports, recommendations and feedback based on your preferences



- To disclose anonymized Personal Information to disclose statistics and analytics and other details regarding the use of our App and/or Website.
- To optimize or improve our products, services and operations
- To automatically update the App on your device
- To detect, investigate, and prevent activities that may violate our policies or be illegal
- To perform statistical, demographic, and marketing analyses of users of the App and/or Website

### **Use of Your Location Information**

- Specifically, we use your location information to:
- Personalize content on our App and/or Website, including providing you reports, recommendations and feedback based on your preferences
- Optimize or improve our products, services and operations
- Detect, investigate, and prevent activities that may violate our policies or be illegal
- Perform statistical, demographic, and marketing analyses of users of the App and/or Website and their purchasing patterns

### **Combination of Your Personal Information**

We use the information from one portion of the App and/or Website on other portions of the App and/or Website or elsewhere in our operations, or in reports and analysis, all of which are owned and operated by Ghost, and we may combine information gathered from various portions of the App and/or Website into a single customer record or analysis or report. We also use and/or combine information that we collect off-line or we collect or receive from third-party sources to enhance, expand, and check the accuracy of your customer records.

### **WHO DO WE PROVIDE YOUR INFORMATION TO?**

Except as disclosed in this Privacy Policy, we do not disclose your Personal Information collected online to any companies not part of Ghost or its parent, subsidiaries or related entities. In no event will we sell or rent your Personal Information as part of a customer list or similar transaction.

### **Business Partners and Third Parties**

We may share your Personal Information with our other business partners from time to time. You may withdraw your consent to our sharing of your Personal Information with business partners and third parties at any time by following the opt-out process described below.

### **Third-Party Agents**

We have third-party agents, subsidiaries, affiliates and partners that perform functions on our behalf, such as hosting, billing, logistics, shipping, fulfilment, payment processing, push notifications, storage, bandwidth, content management tools, analytics, customer service, fraud protection, etc. These entities have access to the Personal Information needed to perform their functions and are contractually obligated to maintain the confidentiality and security of that Personal Information. They are restricted from using, selling, distributing or altering this data in any way other than to provide the requested services to the App and/or Website.



## **Emergency Situations**

We may also use or disclose Personal Information if required to do so by law or in the good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or the App and/or Website; (b) protect and defend our rights or property, the App and/or Website or our users, and (c) act under emergency circumstances to protect the personal safety of us, our affiliates, agents, or the users of the App and/or Website or the public. This includes exchanging information with other companies and organizations for fraud protection.

## **SECURITY OF INFORMATION**

We take the security and confidentiality of information we collect very seriously and have implemented physical and electronic safeguards. We exercise care in providing secure transmission of your information from your device to our servers. Personal Information collected by our App and/or Website are stored in secure operating environments that are not available to the public. Our security procedures mean that we may occasionally request proof of identity before we disclose your Personal Information to you. Please understand, however, that while we try our best to safeguard your Personal Information once we receive it, no transmission of data over the Internet or any other public network can be guaranteed to be 100% secure.

Transaction information including payment card details is handled through our payment processor and is PCI Compliant.

We require that in our agreements with our vendors that personal information passed to third parties for the purpose of order fulfillment or transaction processing is held securely and used only to carry out the relevant activity.

## **EXTERNAL LINKS**

The Website may contain links to other external or third-party websites. Ghost have no control over websites outside the [www.ghostvapes.com](http://www.ghostvapes.com) domain and cannot be held responsible or liable for use of any personal information provided by any User to any such external website.

## **HOW LONG DO WE KEEP YOUR INFORMATION?**

Following termination or deactivation of your account, Ghost, its Clients, Affiliates, or its service providers may retain information (including your profile information) and user content for a commercially reasonable time for backup, archival, and/or audit purposes. If you have any questions about termination or deactivation of your account, please contact us directly at [info@ghostvapes.com](mailto:info@ghostvapes.com).

## **GOVERNING LAW**

The Website and the App are published in the United States. We attempt to protect the personal information of all users of the Website and the App and we attempt to comply with local data protection and consumer rights laws to the extent they may apply to our Website and our App, but our Website and our App is located and targeted to United States citizens and our policies are directed at compliance with those laws. You understand that your use of the Website and/or the App may involve the transfer of personal information to the United States or other countries where Ghost operates its business. You consent to all such transfers of your personal information to the United States or other jurisdictions where Ghost has operations. If you are uncertain whether this



privacy policy conflicts with the applicable local privacy laws where you are located, you should not submit your personal information to Ghost.

#### **ASSIGNMENT**

We may change our ownership or corporate organization while providing the Website and the App. We may also sell certain assets associated with the Website and the App. As a result, please be aware that in such event we may transfer some or all of your information to an entity acquiring all or part of our assets or to another entity with which we have merged. Under such circumstances we would, to the extent possible, require the acquiring party to follow the practices described in this Privacy Policy, as it may be amended from time to time. Nevertheless, we cannot promise that an acquiring entity or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Policy.

#### **CHANGES TO THIS POLICY**

As the Website and the App continue to develop, we may add new services and features to the Website and the App. In the event that these additions affect our Privacy Policy, this document will be updated appropriately. We will post those changes prominently so that you will always know what information we gather, how we might use that information and whether we will disclose it to anyone. We do, however, recommend that you read this Privacy Policy each time you use the Website and the App in case you missed our notice of changes to the Privacy Policy. We will not, however, materially change our policies and practices to make them less protective of Personal Information we have previously collected from you without your express consent.

#### **WHAT ARE YOUR CHOICES AND HOW DO YOU OPT-OUT?**

We believe you should have choices about the collection, use and sharing of your information. Although you cannot opt-out of all data collection when you visit our sites, you can limit the collection, use and sharing of your personally identifiable information.

#### **Collection of Personal Information**

All personally identifiable information is provided on a voluntary basis. If you do not want Ghost to collect such information, you should not submit it to the Website or the App. However, not doing so will restrict your ability to order products, access some content and use some of the functionality of the Website or the App.

#### **Emails and Other Communications**

If you would like to alter the type of communications you receive from us, including opting out of promotional communications from us, you may do so at any time by updating the communication preferences specified in your account profile through the Website or the App. Please note that this may affect your ability to access certain products and services, and we may continue to send non-promotional communications such as order confirmations, surveys, and other information about your use of the Website and/or the App. If you refer others to us using our email functionality, please note that they may choose not to receive any promotional emails from us in the future by following the opt-out instructions in the email invitation.



### **Accessing and Correcting Your Information**

If you have an account with Ghost, you may review and change your information by logging into your account and editing your profile. Be advised that we may not be able to delete your Personal Information without also deleting your user account. You will not be permitted to examine the Personal Information of any other person or entity and may be required to provide us with Personal Information to verify your identity prior to accessing any records containing information about you. We may not accommodate a request to change or delete Personal Information if we believe doing so would violate any law or legal requirement, or cause the information to be incorrect.

If you have any questions about this Privacy Policy, you should contact us by email at [info@ghostvapes.com](mailto:info@ghostvapes.com).

### **YOUR CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798.83 permits customers of Ghost who are California residents to request certain information regarding its disclosure of their personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [info@ghostvapes.com](mailto:info@ghostvapes.com).

### **CONTACT**

Ghost Vapes can be contacted with any comments or queries by one of the following means:

Mail: 9242 Beverley Boulevard, Beverley Hills, CA 90210

Email: [info@ghostvapes.com](mailto:info@ghostvapes.com)

Please note that these are not dedicated contact points for product registration or technical support. For queries relating to these areas please refer to the contact details provided elsewhere on the Website.