

PRIVACY POLICY

This privacy policy (the "Privacy Policy") describes how Palm Commodities International, LLC ("Palm") collects, uses, and shares personal information gathered via our website located at www.palminc.com, as well as credit card information provided by customers. By visiting the Website, or providing credit card information for orders, you accept and consent to the practices described in the Privacy Policy.

1. <u>Collection of Personal Information</u>

"Personal Information" may include your name, company, email address, mailing address, phone number, or credit card information.

Palm collects Personal Information through the Website in response to requests related to, or communications received through, the Website. For example, if you complete the "Contact Us" form on our Website, you will be asked to submit your name, company, and email address, at a minimum. Palm will not store or process this Personal Information for longer than is needed to respond to requests related to, or communications received, through the Website.

You may also provide Personal Information like credit card information to pay for purchases.

2. <u>Use of Personal Information</u>

The Personal Information that you provide will be used by us:

- (1) To respond to your requests or questions submitted through the Website; or
- (2) To process your purchases (when Personal Information contains credit card data).

3. <u>Sharing of Personal Information</u>

Palm will only share your Personal Information as described in this Privacy Policy. We may disclose your Personal Information:

- (1) To our affiliates;
- (2) To third-party service providers;
- (3) To third parties in connection with a merger or acquisition;
- (4) As required by applicable law, rule, regulation, or court order;
- (5) As requested by governmental or administrative authorities;
- (6) As needed to investigate potential fraud or threats; or,
- (7) As necessary to enforce our rights and defend our interests.

We will not sell your Personal Information or provide your Personal Information to third parties for direct marketing purposes.

4. Security and Method Used for Transmission of Payment Data

We use reasonable administrative, technical, and physical safeguards to protect Personal Information from loss, theft, alteration, or misuse. However, you acknowledge and agree that:

- (1) In general, the transmission of information over the internet is never completely secure, private, or confidential;
- (2) Any information that is sent or received using electronic means may be intercepted or used by third parties; and,
- (3) We are not responsible for circumvention of any privacy settings or reasonable security measures.

Personal Information containing credit card data shall be transmitted personally rather than through electronic means, and you assume the risk of potential interception if you choose to transmit the data otherwise.

5. Children

We do not knowingly collect or store personal information from anyone under the age of 13 unless or except as permitted by law. ANY PERSON WHO VISITS THE WEBSITE REPRESENTS TO US THAT HE OR SHE IS AT LEAST 13 YEARS OF AGE. If we are made aware that we have received personally identifiable information from someone under age 13, we will use reasonable efforts to remove that information from our records.

6. Cookies and Do Not Track

We do not access cookies to collect personal data. Therefore, we do not respond to browser Do Not Track signals.

7. Revision of Policy

We may, in our sole discretion, change this Privacy Policy from time to time. Such revisions will be effective immediately when posted and apply thereafter. You are expected to review this Privacy Policy periodically and inform yourself of any revision.

8. <u>U.S. Legal Application</u>

The information collected by Palm is hosted in the United States of America and is subject to U.S. state and federal law. If you are accessing the Website from other jurisdictions and providing Personal Information, please be advised that you are transferring your Personal Information to us in the United States where data protection and privacy laws may be less stringent than the laws of your country. BY USING OUR WEBSITE, YOU CONSENT TO THE TRANSFER AND USE OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY.

9. Questions

If you have questions about this Privacy Policy, please contact us at:

Palm Commodities International, LLC Attn: Legal Department 1717 JP Hennessy Drive LaVergne, TN 37086 legal@palminc.com