



## **RAHR CORPORATION PRIVACY POLICY**

Rahr Corporation and the Rahr group companies, including Rahr Malting Co., Brewers Supply Group, Inc., LLC, Gambrinus Malting Co., Koda Energy, LLC, Brewer's Supply Group (Canada) Limited, Rahr Hops Company, LLC, Rahr Bushel Boy, LLC (collectively, "Rahr") is committed to the privacy of your information. This Privacy Policy is meant to help you understand the information we collect, why we collect it, and how you can manage it. This Policy applies to our websites available at [rahr.com](http://rahr.com), [rahrmaltingco.com](http://rahrmaltingco.com), [gambrinusmalting.com](http://gambrinusmalting.com), [bsgcraft.com](http://bsgcraft.com), [bsgcraftbrewing.com](http://bsgcraftbrewing.com), [bushelboy.com](http://bushelboy.com), [kodaenergy.com](http://kodaenergy.com), [bsgcanada.com](http://bsgcanada.com), [bsghandcraft.com](http://bsghandcraft.com), [bsgdistilling.com](http://bsgdistilling.com), and [bsgwine.com](http://bsgwine.com) (the "Site") and any related products, services, or communications (the "Products and Services"). By using our Site, or by purchasing our Products and Services, you are acknowledging that you have read, understood, and accept this Privacy Policy and our Terms of Service.

In this Privacy Policy, any use of the words "you," "yours," or similar expressions refers to users of this Site and our Services, as well as any other individuals whose information we collect and process. References to "we," "us," "our" or similar expressions refer to Rahr.

This Policy does not extend to anyone whose personal information is not under our control or management, including data that is collected by other websites that you may visit before or after this Site, and which are not governed by this Privacy Policy. We are not responsible for the data protection or privacy policies of any other websites and accept no responsibility or liability for those policies. Please carefully check the policies of other websites and services you use before you visit or submit personal information.

### **1. Information We Collect**

1.1 Information We Collect and Receive. For you to use our Site and Services, we need to collect and process certain types of information. Depending on your use of our Site and Services, this may include:

- a. Information you provide to us by completing forms on our website: For example, your name, contact, and address information, and any other information you may provide in the forms on our website;
- b. Information you provide to us by contacting us: Any personal information you may provide to us when you email or call us, such as name, phone number, employer, and any other details you provide in your communications. Rahr may also request your

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215 SW 32<sup>nd</sup> Ave  
Owatonna, MN 55060

4660 S. Monroe Ave  
Mason City, IA 50401



contact information for the purposes of having someone contact you for additional information, or in response to your request for information from us;

- c. Transaction information when you purchase Products or Services from us: For example, if you make purchases with your credit card, we may use your credit card information for shipping, billing, and credit card validation purposes;
- d. Information to support delivery of our Products and Services: For example, we may require your address to deliver Products and other materials you request to you;
- e. Login information, such as username and password, that you may use in connection with our Services;
- f. Information about your activity through our Products and Services, including your device information, such as your IP address, the type of device or browser you use, and your actions on the Site.

We will only use personal information to provide you with information, products, or services you have requested, or for other purposes set out in this Policy. Personal information does not include aggregate information from which individual identities have been removed.

**1.2 Information from Children.** Rahr does not knowingly solicit or collect any personal information from anyone under 13 years of age, and children under 13 are not permitted to register for or use our Site or Services, including by subscribing to receive information from Rahr. Parents can contact our customer service department to access, change, or delete the personal information that has been submitted by a child. If we become aware that a child under the age of 13 has provided us with personal information, we will delete it.

**1.3 Cookies and Tracers.** We may use cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers) to recognize you and/or your device(s) on, off and across the Site and different Services and devices. A cookie is a small file that is placed onto your device (e.g., computer, smartphone or other electronic device) that stores information when you visit a website. However, you can control cookies through your browser settings and other tools. You can also opt-out from our use of cookies and similar technologies that track your behavior on the sites of others for third party advertising. Neither the Site nor the Services respond to Do Not Track signals.

Rahr uses cookies and related technologies on our website to help us recognize your device as a repeat visitor and enable certain website features and functionalities. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

Specifically, we use cookies and other similar technologies on this website to:

- Recognize you whenever you visit this website (this speeds up your access to the website as you do not have to log in each time);

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4660 S. Monroe Ave  
Mason City, IA 50401



- Support security and authentication features on our website;
- Obtain information about your preferences and use of our website;
- Carry out research and statistical analysis to help improve our content, products, and services, and to help us better understand our users' requirements;
- Improve the speed and performance of our website and services;
- Make your online experience more enjoyable and efficient; and
- Keep track of the items stored in your shopping basket and take you through the checkout process.

**Types of Cookies:** The cookies we place on your device fall into one of the following two categories:

- **Session cookies:** these allow our website to link your actions during a browser session. These expire each time you close your browser and do not remain on your device afterwards.
- **Persistent cookies:** these are stored on your device in between browser sessions. These allow your preferences or actions across our website to be remembered. These will remain on your device until they expire, or you delete them from your cache.

The cookies that we place on your device may also be:

- **Strictly necessary cookies:** these cookies are essential for you to be able to navigate our website and use its features. Without these cookies, the services you have asked for could not be provided.
- **Performance cookies:** these cookies collect information about how you use our website, for example, which pages you go to most often. These cookies do not collect personally identifiable information about you. All information collected by these cookies is aggregated, anonymous, and is only used to improve how our website works.
- **Functionality cookies:** these cookies allow our website to remember the choices you make (such as your username, language, last action and search preferences) and provide enhanced, more personal features. The information collected by these cookies is anonymous and cannot track your browsing activity on other websites.
- **Marketing cookies:** also known as advertising cookies, these cookies are used to deliver advertisements more relevant to you and your interests. They are also used to limit the number of times you see an advertisement on our website and help measure the effectiveness of the advertising campaign. This is sometimes referred to as online behavioral advertising. In some cases, our partners may use cookies to provide us with information about your interactions with their services. These cookies remember that you have visited a website, and this information is shared with other organizations such as advertisers. Those third-party cookies would be subject to the third-party service's policies.

You can opt-out of online behavioral advertising cookies and similar technologies by using the Digital Advertising Alliance's Consumer Choice Tool available [here](#), or if located in the European Union you can make your choices [here](#). Please note you may continue to receive generic ads.

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4660 S. Monroe Ave  
Mason City, IA 50401



**Controlling Cookies:** Your browser may give you the ability to control some types of cookies. If you do not want to accept the kinds of cookies you can control, you can change your browser settings so that certain types of cookies are not accepted.

If you turn off any cookies, please be aware that you may lose some of the functionality of this website. For more information about cookies and how to disable them please check one or more of the following resources:

<http://www.allaboutcookies.org/>

[https://ico.org.uk/for-the-public/online/cookies/.](https://ico.org.uk/for-the-public/online/cookies/)

**Consent to Use Cookies:** The first time you visit our website, a cookie notice is displayed describing our use of cookies, and linking to this Cookie Policy. As described in that notice, if you use this website after this notification has been displayed to you, we will assume that you consent to our use of cookies for the purposes described in this policy.

## 2. How We Use Information

Rahr may use the personal information we collect for the following purposes:

- a. To allow you to log into and access your account;
- b. To deliver our Products and Services;
- c. To provide customer service and our support services, or respond to any requests you make;
- d. To process any financial transactions you make on our Site;
- e. To facilitate Rahr's development, design, marketing or quality improvement of the Site and for our general business purposes.
- f. To keep your information secure such as by monitoring for security irregularities, and to be able to verify your identity and contact information;
- g. To alert you about product updates, special offers, updated information and other news and services from Rahr;
- h. To ensure our Site and Services are relevant to you and your interests;
- i. To help us create and publish content most relevant to you; and
- j. To contact you in response to sign up forms or requests such as our Contact Us forms.

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4660 S. Monroe Ave  
Mason City, IA 50401



### **3. How Information May Be Shared**

Rahr will never sell or rent any of your personal information, and we will never share your personal information publicly without your consent. However, from time to time, Rahr may engage other trusted third party companies and individuals to perform functions such as sending postal mail and e-mail, removing repetitive information from customer lists, analyzing data, providing marketing assistance, providing search results and links (including paid listings and links), and providing customer service. Such companies shall only use your personal information for those purposes required to perform their functions and you consent to Rahr sharing your personal information with such companies so they can perform their functions. For example, we may store the information described in Section 1.1 above with a third-party data storage service to support delivery of our Products and Services, and to respond to customer service requests. Whenever we share data with third-party services, we require that they use your information only for the purposes we've authorized, and that they protect your personal information at least to the same standards we do.

We also reserve the right to disclose personal information when it is reasonably necessary to conduct our business, protect Rahr's legal rights and property, and to comply with the law or law enforcement. Otherwise, your personal information is never shared with any individual or other organization.

### **4. Protection of your Personal Information**

We take the security of your personal information seriously and follow industry-standard practices to protect the data we collect and process. Rahr has therefore put in place commercially reasonable physical, electronic, and managerial procedures to safeguard and secure the personal information that Rahr collects. Access to personal information will be restricted to our authorized personnel who require the information in order to perform their duties properly. In addition, access will be limited to only that information that is strictly necessary for the performance of those duties.

Remember, the safety and security of your information also depends on you. Where you have chosen, or where we have given you a username and password for access to certain parts of the Site or Services, you are responsible for keeping the username and password confidential. No method of transmission over the internet or electronic storage is completely secure, so Rahr cannot guarantee its absolute security.

### **5. Data Transfers**

Because Rahr is a US-based company, your information may be collected and processed in the United States. Additionally, as part of the products and services offered to you through our Site, the information which we collect about you may be transferred to, and stored in, one or more countries other than where you currently reside. For example, this may occur if any of our

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4660 S. Monroe Ave  
Mason City, IA 50401



servers or third-party service providers are in a country other than yours. These countries may have different data protection laws that are similar to your current residence. However, if we transfer your information in this way, we will put in place appropriate protection to make sure your personal data remains adequately protected and is treated in line with this Privacy Policy.

## 6. Basis for Processing - European Union Residents

Data protection law in Europe requires a “lawful basis” for collecting and retaining personal information from residents of the European Economic Area. Our lawful bases include:

- Performing the contract we have with you: In certain circumstances, we need your personal data to comply with our contractual obligation to deliver our Products and Services, and assist with any questions you may have.
- Consent: we may ask your consent to process your personal information in some situations.
- Legal compliance: Sometimes the law says we need to collect and use your data.
- Legitimate interests: This is a term in data protection law that allows us to process your personal information if we have a fair reason to use your data, and only if we do so in ways which do not hurt your interests and rights. We sometimes require your data to pursue our legitimate interests in running our business, including for delivering our Products and Services, fraud prevention, quality assurance, and marketing purposes, as long as our use of your data does not materially impact your rights, freedom or interests. This allows us to improve and develop the quality of the online experience we offer all our users.

## 7. Email Notifications

We try to keep email communications to a minimum and give you the ability to opt out of any marketing communications we send. For example, we may send you email relating to the Products or Services that we offer. You may also elect to receive certain marketing email communications in accordance with your preferences, and from which you may opt out at any time. You can always opt out of receiving email information or other electronic notifications from Rahr (other than certain required communications informing you of the completion of a purchase, user registration, correction of user data, or change of password), by adjusting your user preferences in your account profile if you are a registered user, or by sending us an email at [Privacy@Rahr.com](mailto:Privacy@Rahr.com) stating your request. If we have sent you a promotional email or mobile device notification, you may send us a return email or mobile device communication asking to be omitted from future email or mobile device distributions. This opt out does not apply to

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Owatonna, MN 55060

4660 S. Monroe Ave  
Mason City, IA 50401



information provided to Rahr as a result of a purchase of the Products or Services, product service experience, or other transactions.

## 8. Retention

We will hold your personal information on our systems for as long as is necessary to perform the relevant processing activity for that information, or as long as is set out in any relevant contract you hold with us. This is a case by case determination that depends on things like the nature of the data, why it is collected, why it is processed, and any relevant legal or operational retention needs. For example, we may retain your data for as long as you maintain an account on our Site so that we may process and deliver your orders. We may also be legally required to hold some types of information to fulfil our statutory obligations. We review our retention periods for personal information on a regular basis. When the relevant processing activity has been completed, we may destroy your data, or alternatively anonymize the data in such a way that you are not personally identifiable, either directly or indirectly.

## 9. Personal Information Requests - California and European Union Residents

Users or Site visitors residing in certain locations, including California and the European Union, may be afforded certain rights regarding their personal information. Except where an exception or exemption applies, these rights may include 1) the ability to request access to or a copy of the information we have collected about you; 2) the right to review our data collection practices related to you; 3) the ability to request deletion of your personal information; 4) the right to request correction of any information we hold about you; 5) the right not to be discriminated against due to your exercise of any of the preceding rights; and 6) the right to request portability of your data. In certain circumstances, you may also request restriction of, or objection to the processing we perform about you. While these rights are not globally applicable, our customers are entitled to access the personal information that we hold about them.

You may also send us an email at [Privacy@Rahr.com](mailto:Privacy@Rahr.com) to request access to, correct, or delete any personal information that we hold about you. Residents of California may designate an authorized agent to exercise certain privacy rights on their behalf and should make any such request by contacting the above email address. To protect your privacy and security, Rahr may take reasonable steps to verify your identity before granting access to, correcting, or deleting data. We will attempt to respond to your request for information within 30 days. Please note that we may retain certain information as required by law or as necessary for our legitimate business purposes.

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## 10. EU-US Privacy Shield

Rahr participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. Rahr is committed to subjecting all personal data received from European Union (EU) member countries and the United Kingdom, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's [Privacy Shield website](#).

Rahr is responsible for the processing of personal data that it receives through the Privacy Shield Framework that it subsequently transfers to a third party acting as an agent on its behalf. Rahr complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Framework, Rahr is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Rahr may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## 11. Questions, Comments, or Complaints

If you have questions or comments about this Privacy Policy, or if you are not completely satisfied with this Privacy Policy or its application by us, we invite you to convey your concerns or suggestions to us at [Privacy@Rahr.com](mailto:Privacy@Rahr.com). If you have an applicable disability, you may also contact us at the above email address to request access to this Privacy Policy an alternative format. We will reply as quickly as possible and inform you of the steps, if any, that have been or will be taken in order to address your concern or implement the suggestion.

Rahr strives to satisfy our customers' and visitors' privacy concerns. However, if you have contacted Rahr about your issue and feel that your issue is still unresolved, and if you are also a resident of the European Economic Area, subject to applicable law, you may contact our independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, visit <https://bbbprograms.org/privacy-shield-complaints/> for more information and to file a complaint. This service is provided free of charge to you.

Finally, under certain conditions more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

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4660 S. Monroe Ave  
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## 12. Updates and Changes to this Privacy Policy

This Privacy Policy is effective as of **[DATE]**. We may update this Policy from time to time. If we do, we'll let you know about any material changes, either by notifying you on the Site or by sending you an email. If you keep using our Site, Products, or Services after a change, that means you accept this Policy.

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