

# **Bluff City Smugglers Privacy Policy**

This Privacy Policy describes how TRG Equity, Inc., owner of Bluff City Smugglers (“**Bluff City Smugglers**,” “**we**” or “**us**”) collects, uses and shares any personal information about users. Use of Bluff City Smugglers’ websites, apps, notifications and all systems related (the “**Services**”, the “**Platform**”) is subject to this Privacy Policy and our Terms of Service. To understand our practices and your options, please read the following.

Prior to any significant changes to this Privacy Policy, we will notify you by email or via the Platform. If you have questions, please email us at [whatsup@901smugglers.com](mailto:whatsup@901smugglers.com), or send us postal mail at: Bluff City Smugglers, 80 Monroe Ave, Ste. 610, Memphis, TN 38103.

## **1. What Information do we retain about you?**

Bluff City Smugglers collects information about you through a variety of methods. First, we collect all of the information that you use to enroll on the Platform during your account creation. This is usually limited to basic information such as your name and date of birth, your email address and phone number, your email used for account creation and the corresponding account password, your billing information and your delivery address for future uses of the Platform and any information that you choose to share regarding your social media. We also collect tracking information when you use the Services which can include your device and browser type, the pages that you view, your IP address and your paths through referring/exit pages, as well as how you interact with the Services and third party links. We give you the option to disable cookies, the method by which this information is collected, though in blocking cookies, numerous features within the Platform may not work. To learn more about cookies, please visit the third party site [All About Cookies](#). The Platform also collects your location when you use the Platform on any kind of Smartphone. As with tracking Cookies, you can opt out of this through the settings on your device or in the App, though critical features will cease to work without location services. Finally, Bluff City Smugglers may choose to collect information about you from other sources, including social media, public records and third-party entities, both private and public.

## **2. What do we do with the information that we collect?**

The primary reason for our data collection via the Platform and related Services is to provide a better experience for our users. With the information collected, as described above, we are able to personalize your experience on the Platform. We do this through letting you rate your services, notifying you of special offers and helping you promote reviews of products that you like and share them to folks that you think would enjoy the same or similar products, and to suggest new products that we think you might enjoy – all of which is used to create a profile around your preferences and identify trends or shifts in trends of your personal preferences. We also use the information we collect about you to run sweepstakes, contests and promote the Platform through prize giveaways. Further, we use the information to troubleshoot problems with the service, notify you of account-related issues including issues of payment, billing and account maintenance, investigate fraud when we suspect it and address instances of fraud quickly,

effectively and appropriately, and to generally provide better customer service. Finally, we use the data that we collect to create a profile around your preferences

### **3. What information do we share and who do we share it with?**

First, all information that we share is anonymized. While we may share data suggesting trends or preferences across the base of users on our Platform, we ensure that such data is never tied directly to you in such a way that the information could personally identify you. The information we share is used for analysis about segments of the market, to tailor advertisements to you in order to ensure that the content within the advertisements is valuable to you, or to develop consumer insights for third-party entities with whom we have partnerships. Among these entities are Retailers, Services Providers, Law Enforcement, Third-Party or In-house Analytic firms, or entities engaged in a sale of some or all of Bluff City Smugglers through processes of investment cycles and acquisition. At no point do we share your payment information with any entities outlined above. The only entity who has access to your payment information besides Bluff City Smugglers, through use of the Platform, is Stripe, Inc. who processes the payment. With no private entity do we share personal information and any information that is shared is held to the highest standard of privacy. The only entities with whom we share personal information are public entities involved in Law Enforcement acting to protect legal rights and public and personal safety, to stop illegal or unethical activity, or as required by law and we require such entities to provide proof of legal authority and adherence to all legal processes in order to acquire such information.

### **4. Miscellaneous Notices and Disclaimers Regarding Privacy**

- a. All payments are processed through the services of a third-party entity, Stripe, Inc. but we may collect the type, last four digits and expiration date of your credit or debit card number in order to allow for ease of payments in the future.
- b. All information and preferences relating to the Services which are tied to your account can be updated through our account portal on the Platform.
- c. If you choose to opt out of text or email marketing from us, follow the instructions in the text or email. Any decision to opt out does not apply to account-related notifications, which are required in order to use the Services as part of the terms contained within the Terms and Conditions. To stop all account-related notifications, send us a request to deactivate your account at [whatsapp@901smugglers.com](mailto:whatsapp@901smugglers.com).
- d. Unless a longer period is required or permitted by law, Bluff City Smugglers may keep your personal information as long as needed for the purposes in this Privacy Policy.
- e. We use encryption and firewalls, standard security practices found among most major service platforms, to protect the information we collect from you. This does not mean, however, that all information is completely secure. We take pride in our security measures and routinely update them as advancements in security come along but cannot guarantee – nor can any service platform – absolute security of your information.
- f. Any actions that are taken on your account are solely your responsibility. We highly recommend you using the utmost discretion when providing information and managing your account. Please ensure that you do not give your password to any individuals and when creating your password please use unique numbers, letters and special characters, avoiding any words used in standard languages. If you have questions about password

security, please review our Terms of Service. If your password is compromised, we strongly recommend that you notify us immediately via official written notice to [whatsup@901smugglers.com](mailto:whatsup@901smugglers.com).

- g.** Do not use the Services or send us any information whatsoever, of any kind or in any form if you are less than 21 years of age. The Platform and the Services are exclusively for individuals aged 21 years or greater. At no point do we knowingly collect information about any individual under 21 years old and if we discover that we have collected information about any individual less than 21 years old we will delete it as soon as we find it. If you, or someone you know, has found evidence of information on the Platform regarding someone less than 21 years of age, please contact us as soon as possible at [whatsup@901smugglers.com](mailto:whatsup@901smugglers.com). We have more information regarding our policy on individuals less than 21 years of age in the Terms and Conditions.

You can contact us by email at [whatsup@901smugglers.com](mailto:whatsup@901smugglers.com), or by postal mail at: Bluff City Smugglers, 80 Monroe Ave, Ste. 610, Memphis, TN 38103.

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