# Privacy Policy

This Privacy Policy describes how Pacific Marketing Alliance, Inc. (DBA PMAI) collects, processes, protects, or otherwise handles the information you provide to us when you visit pmaiusa.com.

### Information Collected and its Uses

### **Voluntarily Submitted Information**

When registering, placing an order, or otherwise using our site, you may be invited to share personally identifying information, including your name, email address, mailing address, phone number, credit card information, in order for us to contact you, to facilitate any requested transactions, and to provide you with a better experience.

## Passively Collected Information

We automatically receive certain information from your browser when you visit our site. This information includes your browser type, system type, IP address, cookie information, and referring URL. If you register for our site or opt-in to receive emails from us, our emails may also include an embedded image that tells us whether you opened the email. We use this information to measure and improve the performance of our site and emails.

## **Information Sharing**

### Information Shared Within PMAI Family of Companies

We may share information with our family of companies, which includes Kikkoman Corporation, Kikkoman Sales USA, Inc., Kikkoman Foods, Inc., JFC International, Inc., and other subsidiaries and affiliates of Kikkoman Corporation, for a variety of purposes, including improving our products and services and providing you with the latest information about our products and services.

## Information Shared with Vendors

We work with a limited number of vendors and business partners who help us operate pmaiusa.com, process data, deliver emails, and facilitate any requested transactions. We may also share aggregated information with other parties for marketing and advertising purposes. However, this aggregated information does not include nor is linked to any information that can identify any particular person.

### Information Shared with Other Third Parties

We do not sell or trade your information with third parties. However, we may disclose your information to third parties (other than those identified above) in certain circumstances, including but not limited to:

- to comply with valid legal process including subpoenas, court orders or search
  warrants, and as otherwise authorized by law; in cases involving danger of death
  or serious physical injury to any person or other emergencies;
- to protect our rights or property or the safety of our customers or employees;
- to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of

our products and services;

- to advance or defend against complaints or legal claims in court, administrative proceedings, and elsewhere;
- to a third party that you have authorized to verify your account information;
- to outside auditors and regulators; and
- with your consent.

In the event there is a merger, acquisition, or sale of all or a portion of PMAI's assets of business, your information may also be transferred as a part of or in connection with the transaction.

#### **Our Use of Cookies**

Cookies are small data files transmitted from a website or its service providers and stored your computer by your web browser. We use cookies to facilitate the user experience, collect analytic data, and improve website performance. Cookies allow us to save your preferences based on previous or current site activity and makes the website easier to use, including saving you time when filling out a form by pre-populating it with information you previously provided. Cookies also help us to better understand how people interact with our website by collecting information like the number of visitors, whether a visitor is new or returning, how often a visitor comes to the website, which pages they have visited. This information enables us to provide you with improved services.

You may change your browser settings to have your computer warn you each time a cookie is being sent or to turn off all cookies. Each browser is a little different, so please review your browser's settings and help center to modify your cookie settings.

Please note that if you choose to disable cookies, some website features may not be fully functional.

### **Links to Third-Party Websites and Content**

Our website may include links to third-party websites and content on those sites. Our site may also feature embedded media, such as images or videos, that are hosted on other third-party platforms. When you click on these links or interact with these types of external content, the third-party providers of such content may place their own cookies on your computer, access existing cookies, and gather information about you. To learn about how these third parties treat the data they collect from you, please review their respective privacy policies.

### **Marketing Emails**

Marketing emails you receive from PMAI include instructions on how to unsubscribe from and opt-out of receiving future marketing-related emails. You may also opt-out of receiving marketing-related emails by contacting us through any of the methods identified in the "Contact Us" section.

## **Telemarketing**

Federal "Do Not Call" laws allow you to place your phone numbers on the National Do Not Call Registry to prohibit many telemarketing calls to those numbers. To add your numbers to this list, please call 1.888.382.1222 or visit the National Do Not Call Registry.

However, please be aware that most telemarketing laws allow companies to contact their own customers without consulting the federal or state Do Not Call list. If you would like to be removed from our telemarketing list, please contact us through any of the methods identified in the "Contact Us" section.

# **California Online Privacy Protection Act**

We do not knowingly market to or solicit personal information from children under the age of 13 without obtaining verifiable parental consent.

## **Information Security**

We implement a variety of security measures to protect against the unauthorized access to any information you may provide us. However, please note that no website or company can fully eliminate security risks. Despite our efforts to safeguard your information, third parties may circumvent our security measures to intercept or access data transmissions or personally identifiable information.

## **Updates to this Privacy Policy**

We may update our Privacy Policy as necessary, so please check back periodically for changes. You will be able to see that changes have been made by reviewing the effective date at the end of the Privacy Policy.

## **Contact Us**

If you have any questions, concerns, or requests related to our Privacy Policy, please contact us at:

Pacific Marketing Alliance, Inc.

Attn: Privacy Request 1700 W. Walnut Parkway Compton, CA 90502 mall@pmaiusa.com

Tel: 310-661-7260 Fax: 310-762-9026

Updated January 20, 2020.

# **Privacy Notice for California Residents**

This Privacy Notice for California Residents supplements the information contained in the

Privacy Policy and applies solely to California residents. We adopt this notice to comply with the California Consumer Privacy Act of 2010 ("CCPA"), California Civil Code §§ 1798.100 et seq. Any terms defined in the CCPA have the same meaning when used in this Privacy Notice.

## **Information Collected**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes

E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	No
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations.	No
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

## Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## **Sources of Personal Information**

We obtain the categories of personal information listed above from the following categories of sources:

• Directly from you or PMAI Family of Companies. For example, from information that you provide us via the Contact Us form.

- Indirectly from third party vendors. For example, through information we collect from our vendors to fulfill your order or other request.
- Directly and indirectly from activity on our website (www.pmaiusa.com). For example, from information submitted through our website or website usage details collected automatically.

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- to fulfill or meet the reason for which the information is provided; For example, if you provide us with personal information in conjunction with an order, we will use that information to process the order;
- to provide you with information, products or services that you request from us;
- to provide you with email alerts, event registrations and other notices concerning our products or services, or news, that may be of interest to you;
- to improve our website and present its contents to you;
- to test, research, analyze, and develop new products and services;
- to comply with valid legal process including subpoenas, court orders or search
  warrants, and as otherwise authorized by law; in cases involving danger of death or
  serious physical injury to any person or other emergencies;
- to protect our rights or property or the safety of our customers or employees;
- to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of our products and services;
- to advance or defend against complaints or legal claims in court, administrative proceedings, and elsewhere;
- to a third party that you have authorized to verify your account information;
- to outside auditors and regulators;
- with your consent; and
- to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- A: Identifiers
- B: California Customer Records
- D: Commercial information

F: Internet or network activity

We disclose your personal information for a business purpose to the following categories of third parties:

- PMAI Family of Companies;
- Service providers; and
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold or licensed any personal information.

### **Your Rights and Choices**

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

## Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - o disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### **Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a
  good or service that you requested, take actions reasonably anticipated within the
  context of our ongoing business relationship with you, or otherwise perform our
  contract with you.
- 2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- 3. Debug products to identify and repair errors that impair existing intended functionality.
- 4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- 5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seg.).
- 6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- 7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- 8. Comply with a legal obligation.
- 9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a consumer request to us at:

Pacific Marketing Alliance, Inc. Attn: Privacy Request 1700 W. Walnut Parkway Compton, CA 90502 mall@pmaiusa.com

Tel: 310-661-7260 Fax: 310-762-9026

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a consumer request related to your personal information. You may also make a consumer request on behalf of your minor child.

To submit a request, you must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, including your full name, date of birth, address, email address, and phone number; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

You may only make a consumer request for access or data portability twice within a 12-month

period.

## Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if any.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **Changes to Our Privacy Notice**

We may update our Privacy Policy as necessary, so please check back periodically for changes. You will be able to see that changes have been made by reviewing the effective date at the end of the Privacy Policy. We reserve the right to amend this privacy notice at our discretion and at any time.

### **Contact Information**

If you have any questions or comments about this Privacy Notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under the CCPA, please do not hesitate to contact us at:

Pacific Marketing Alliance, Inc. Attn: Privacy Request 1700 W. Walnut Parkway Compton, CA 90502 mall@pmaiusa.com

Tel: 310-661-7260 Fax: 310-762-9026 Updated January 20, 2020.

