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Privacy Policy

(Effective Date: 6/1/2017)

This privacy policy explains what personal data we collect from you, how we use it, and how you can control your privacy. This privacy policy applies to the information the operators of the VapeScape Community website (“we”, “our” or “us”) collect on or in connection with this website and any associated applications (collectively the “Site”). By accessing or using the Site, you agree that your information and content will be handled in accordance with this privacy policy, as may be amended from time from time (the “Privacy Policy”).

We encourage you to read the summaries below and to click on “Learn More” if you’d like more information on a particular topic.

Restrictions on Access and Use

Adult Tobacco Consumer Audience Only. In order to use the Site you must be 21 years of age or older. We restrict our Site and communications to individuals who have certified that:

- (1) they are tobacco consumers,
- (2) they are 21 years of age or older,
- (3) they want to participate in the VapeScape Community, and
- (4) they understand that providing false information may constitute a violation of law.

Geographic Restrictions. This Site is operated, in whole or in part, from the United States. By using this Site, regardless of where you live in the world, you consent to have any personal information you provide to us transferred to, processed, and stored in the United States, and you authorize us to use and collect your personal information in accordance with this Privacy Policy.

Why We Collect

We collect information for a variety of business purposes, including without limitation, to provide the services you request, to collect information that is needed to to operate and improve the Site, to administer our business (e.g., to conduct consumer research among tobacco consumers 21 years of age or older), and to administer contests, sweepstakes, surveys, polls, and other promotional events. This information helps us to improve our Site, products and services.

We strive to maintain accurate information on the adult tobacco consumers who are registered users on the Site through consumer surveys, adult tobacco consumer-initiated contacts, and responses to our programs (online and offline), as well as through address update services.

What We Collect

We collect information about you directly from you or your devices. We may also receive information about you from third parties that provide services for us in connection with the Site, as well as from other adult tobacco consumers and third parties to whom you have provided information.

Personal Information. “Personal information” is data that can be used to uniquely identify or contact an individual, such as, your name, date of birth, driver’s license number, telephone number, mailing address, and email address. There are a number of ways in which you may explicitly and intentionally provide us with, and consent to our collection of, certain personal information, including:

- **Registering to access the Site.** When you register and log into the Site, we collect, and associate with your account, information like your name, date of birth, email address, phone number, and physical address. We may also collect additional information to verify your age.
- **Updating Your Profile.** You can update certain personal information associated with your account (such as your last name, mailing address and email address) by logging into your account and going to “My Profile.” If you request certain free gifts, sweepstakes prizes, or other materials be sent to you, you may be asked to confirm or update your email or mailing address.
- **Completing a “Contact Us” Form.** If you complete a “contact us” request form, we require you to provide your current email address.

- **Submitting Content to the Site.** When you use the Site, we store, process and transmit content you post or submit to the Site (including things like your survey responses, comments on message boards, photos you upload) and information related to them (for example, location tags in photos). This will make it easy for you to do things like share items/materials, post messages, and respond to offers and other information on the Site.

Non-Personal Information. “Non-personal information” is information that cannot be used to easily identify an individual and includes information about how you access and use our Site. We collect several types of non-personal information, including:

- **Location Information.** Your devices (depending on their settings) may transmit location information to the Site. This allows us to provide you with content and offers that may be relevant to you based on your location.
- **Traffic Data.** Whenever you visit or interact with our Site, we (as well as our service providers) may use assorted technologies that automatically or passively collect information about how the Site is accessed and used. We refer to this information as traffic data. Traffic data may include, but is not limited to, browser type and version, screen resolution, monitor color depth, AOL version (if applicable), operating system, JavaScript version, connection speed, IP address, device type used to access the Site (i.e., computer or mobile device), unique number assigned to identify such device, application version, click path taken through the Site, your use of features or applications on the Site, and other publicly available information. Technologies we use to collect traffic data, include but are not limited to: cookies (explained below), mobile analytics software tags and beacons.
 - **Cookies.** Cookies are little pieces of information that a website stores on your computer. We may place temporary cookies or similar files on your computer or other devices used to access the Site to facilitate Site navigation (such as to streamline the login process), to personalize your experience while visiting the Site (such as allowing us to select content that is most likely to appeal to you based on your preferences or location), and for security purposes (such as to maintain security while you browse our Site and help ensure that only adult tobacco consumers are on the Site). These cookies are also used to increase the efficiency of Site visits. To learn how you may be able to reduce the number of cookies you receive from us, or delete cookies that have already been installed in your browser’s cookie folder, please refer to your browser’s help menu or other instructions related to your browser. If you do disable or opt out of receiving cookies, please be aware that some features and services on our Site may not work as intended and you may not have access to all of the services and features we may offer.
 - **Flash Cookies.** We also use technology called Flash Local Shared Objects (also known as Flash Cookies). These are data files that allow us to further personalize

your experience while visiting the Site. You can control how much data is stored and maintain a level of privacy with which you're comfortable by controlling the security settings on your device. You can also disable Flash Cookies by changing your Flash Player settings. For more information on how to manage your settings, click [here](#).

- **Beacons.** Certain pages on our Site also contain web beacons (also known as spotlight tags, Internet tags, pixel tags and clear GIFs), which are transparent images that may appear on the Site and in our emails. Web beacons may be used to collect information about your interactions with the Site and our emails, including the pages you view, the emails you open, the features you use, the links you click and other actions you take in connection with the Sites or emails from us in order deliver content that may be of the most interest to you and to improve the Site, our services, and our products.

Who We May Share Information With

- **Our Affiliates.** Reynolds American Inc. and its affiliates and its wholly owned subsidiaries, such as R. J. Reynolds Tobacco Company, share and disclose information with each other; therefore, your personal information may be shared and disclosed by and between Reynolds American Inc.'s affiliates and subsidiaries. Those subsidiaries and affiliates are American Snuff Company, LLC; Nicovum USA, Inc.; R. J. Reynolds Tobacco Company; R. J. Reynolds Vapor Company; and Santa Fe Natural Tobacco Company, Inc. (and other subsidiaries or affiliates that may be added after the Effective Date of this Privacy Policy).
- **Others working for us.** Sometimes it is necessary for us to share your information with third parties that perform services for us. For example, we may disclose your personal information and other information we collect to correct technical problems and malfunctions on our Site, to process your information, and to help us provide, improve, protect, and promote our Site, products and services. We may also share your information with administrators of our sweepstakes, contests and other promotional events. When we contract with other parties to help us conduct our business, we do not permit them to use or store your personal information for any purpose other than the work they are doing on our behalf or as required by law.
- **Certain Mobile Carriers.** If you request services via a mobile device, your request will be transmitted via your mobile carrier's network and your carrier may have access to it. Consult your carrier's privacy policy for additional information.
- **Other Adult Tobacco Consumers.** Your username, alias, avatar, city and state of residence may appear to other adult tobacco consumers that have registered on the Site ("Users") with their postings, comments and activities within the Site. Moreover, when logged into the Site, your on-line presence within the Site may be disclosed to other

Users and other Users may make submissions or post comments directly to you within the Site. Certain features (such as message boards) let you make additional information available to other Users. To further protect your privacy, we encourage you not to post or otherwise disclose within the Site your phone numbers, physical addresses, e-mail addresses, and personally identifying or other sensitive information.

- **Other Third-Parties.** We may also share your information with non-affiliated third parties, including law enforcement officials or other government entities, as appropriate: (1) if we believe that there has been a violation of our Site policies; (2) if we believe that someone may be causing injury to our rights or property, other Users, or anyone else; (3) to respond to judicial process or to provide information to law enforcement agencies; (4) otherwise as required by law; or (5) in the event of a liquidation, reorganization, merger, consolidation, change of control, asset or stock acquisition/disposition or other corporate combination.

How We Protect Your Privacy

We do not sell, rent, or give information about you to other non-affiliated organizations or entities for marketing purposes. We use reasonable precautions, including, but not limited to, technical, administrative, and physical procedures, to protect personal information from loss, misuse, or alteration, calibrated to the sensitivity of the information in our control. Although guaranteed security does not exist on the Internet or offline, we make commercially reasonable efforts to handle such information consistent with this Privacy Policy and applicable laws. Due to the design of the Internet and other factors outside our control, we cannot guarantee that communications between you and our servers will be free from unauthorized access by third parties.

How You Can Control Your Privacy

Opting-Out. If you want to be removed from our contact list, we make it easy to do so. If at any time, you wish to be removed from our contact list or you do not want us to share your personal information with our affiliates, you can contact us by:

- **Online.** Contact support@vapescapepanel.com and ask to be removed from our Marketing List.
- **Using an “unsubscribe link”.** If you receive any email communication from us, you will always be given the option to “unsubscribe” from receiving further email communications from us at any time.

Be sure to include any contact information that you want removed from our contact list, including physical addresses, phone numbers, and email addresses (if you use more than one email address, send your opt-out email from each of your email addresses).

Your option not to receive promotional and marketing material will not preclude us from corresponding with you, by email or otherwise, regarding your existing or past business relationships with us (e.g., any purchase of our products or use of our services, or responses to requests for information you pose to us either through use of the Site or by other means), and will not preclude us from accessing and viewing your personal information in the course of maintaining and improving our Site and our services.

Do Not Track Requests. Unless your browser settings are configured to make your online activities and publicly available information about your online activities (such as traffic data described above) invisible to usage analytics tools, we do not presently have the capability to omit you from usage analytics to the extent your browser only sends us a “do not track” message and does not otherwise screen you from tracking without any action on our part. Third parties, other than our vendors (such as our Site analytics provider), do not have authorization from us to track which websites you visited prior and after visiting our Site. That said, we cannot control all third party tracking and there may be some third party tracking over time and across third-party websites that occurs without our knowledge or consent.

Making Changes to Your Personal Information. You can update certain personal information associated with your account (such as mailing and email address) by logging into your account and going to “My Profile.”

How You Can Protect Your Privacy When Using the Site. You understand that personal information that you post in any public areas of our Site can be read, collected, or used by other users of the Site, and could be used to send you unsolicited messages. You are encouraged to exercise caution when posting personal information about yourself in public areas.

How You Can Protect Yourself Against Identity Theft. If you would like to learn more about protecting against identity theft can visit the FTC's website for more information on how to avoid identity theft at: <http://www.ftc.gov/bcp/edu/microsites/idtheft/>

Notice to California Residents — Your California Privacy Rights. If you are a California resident, you have the right, pursuant to Section 1798.83 of the California Civil Code, to receive once a year, free of charge: (1) information identifying each third party company to whom we may have disclosed, within the past year, personal information pertaining to you for that company's direct marketing purposes; and (2) a description of the categories of personal information disclosed to that third party company in the immediately preceding calendar year. If you are a California resident and would like to make this request, please contact support@vapescapepanel.com. In addition, please refer to the section of this Privacy Policy entitled "Who We May Share Information With."

Links to Third-Party Websites

From time to time, we may provide links to unaffiliated third-party websites. Those websites operate independently from us (and our affiliates) and may have their own privacy statements in place which we recommend you review if you visit any linked websites. To the extent any linked websites you visit are not owned and operated by us or our affiliates, neither we nor our affiliates

are responsible for their content or any use of those websites. The ability to access information of third parties from the Site, or links to other websites or locations, is for your convenience and does not signify our endorsement of such third parties, their services, other websites, locations or their contents.

Changes To This Privacy Policy

We reserve the right to change our Privacy Policy without prior notice to you. We will update this page when we do so. You should check our Privacy Policy frequently on this Site to see recent changes. Use of our Site following such changes constitutes your acceptance of the revised Privacy Policy then in effect.