

## Hortiki Plants Privacy Policy

Effective Date: May 25, 2018

This Privacy Policy applies to [www.hortikiplants.com/www.hortiki.com](http://www.hortikiplants.com/www.hortiki.com) (the "Site"), which is owned and operated by Hortiki Plants, LLC ("Hortiki Plants," "we" or "us"). We may change this Privacy Policy from time to time. Please check the Site periodically to review our current Privacy Policy, which is effective as of the effective date listed above. Your use of the Site and submission of Personal Information online constitutes acceptance and understanding of the Privacy Policy, as in effect at the time of your submission to or use of the Site.

At Hortiki Plants, we recognize and respect your privacy. We act in accordance with global privacy principles and frameworks, including the OECD Guidelines on the protection of Privacy and Transborder Flow, the EU Privacy Directive, and General Data Protection Regulation (GDPR). This Privacy Policy explains how we collect, use and disclose personally identifying information ("Personal Information") and Business Profile Information you voluntarily provide through our Site. We may combine the information you provide to us with information we collect from you offline.

### Types of Personal Information We Collect Through the Site

You may browse our Site without creating an online account. However, if you register an account on our site or make a purchase, we will ask you to provide certain information. In general, we ask you to provide the following types of Personal Information through our Site:

**Event Registration.** If you register for an event, you will be asked to provide your name, email address, business name and other information depending on

the type of event you have registered for. We may combine it with any other Personal Information you have provided to us.

**Newsletters.** If you sign up to receive our newsletters, you will provide your name and email address.

**Product Purchases.** If you order a product on our website, we will ask you to provide information about your purchase, such as your name and contact information and payment information.

**Information We Collect Automatically.** We may use cookies, web beacons, and other similar technologies to collect information about you when you visit our Site. Specifically, we may collect the following information about your use of our Site via these technologies: your browser type and operating system; web pages you view;

links you click; your IP address; your interaction with the Site; length of time you are logged in to our Site; and websites visited before our Site. Please see the section "Cookies and Analytics" below for more information about our use of cookies. We may use the information gathered through these methods in anonymous or aggregated form to analyze ways to improve our Site or services. We may associate this information with the other Personal Information that you have provided to us.

### **Collection of Business Profile Information**

During the purchase process, in addition to Personal Information, Hortiki Plants will also ask you to provide your payment information. This information is not saved on our website and is only used to process payments through encryption via our payment systems.

### **How We Use Information**

We use the information you provide to us for the following types of purposes:

- to communicate sales and product information to you,
- to adjust our offerings to fit your preferences,
- to send you information that we believe you may find of interest, including to send you our newsletter; and
- to improve our Site, products and to better understand how users access and use our Site and offerings, on an aggregated and individualized

Notwithstanding anything else in this Privacy Policy, we also may use or aggregate non- personally identifying information about users for market analysis, research, marketing or other purposes.

### **How We Disclose Information**

We may disclose information you provided to us online to third parties for the following types of purposes:

- to our contractors or service providers (such as service providers who help us to administer our Site or process credit card payments) who provide services or perform functions on our behalf;
- to our affiliates and consultants who are required to treat your Personal Information in accordance with the Privacy Policy and the confidentiality obligations we impose on them;
- in response to a subpoena or other legal process by a governmental entity or third party, or if otherwise required by law;
- "in a limited number of circumstances, Hortiki Plants may need to disclose data without your prior consent, including as needed to satisfy legal requirements, or to protect the rights or property of Hortiki Plants or others

(including the enforcement of agreements or policies governing the use of the service)."

Notwithstanding anything else in the Privacy Policy, we may share aggregate or non-personally identifying information about users with third parties for marketing, advertising, research or other purposes.

### **Subject Access Requests**

You have the right at any time to request information regarding the use and disclosure of any data provided to Hortiki Plants, whether personally identifying data or business profile data. To request this information, please reach us through the email [contact@hortikiplants.com](mailto:contact@hortikiplants.com).

### **Removal of Personally Identifiable Data**

You have the right to remove any personally identifiable data from Hortiki Plants' Database at any time. To do so, please notify us at [contact@hortikiplants.com](mailto:contact@hortikiplants.com)

### **Cookies and Analytics**

When you interact with our Site, we strive to make your experience easy and meaningful. We or our third-party service providers may use cookies, web beacons, clear GIFs, and similar technologies to track user activity and collect Site data. We may combine this data with the Personal Information we have collected from you.

**Cookies.** We (or our third-party service providers) use cookies to track visitor activity on the Site and to administer our Site. A cookie is a text file that a website transfers to your computer's hard drive for record-keeping purposes. Our cookies assign a random, unique number to each visitor's computer. They do not contain information that would personally identify the visitor, although we can associate a cookie with any identifying information that is or has been provided to us while visiting our Site. We or our third-party service providers use cookies that remain on your computer for a specified period of time or until they are deleted (persistent cookies). These cookies record clickstream information (data reporting the URLs, or names of the pages, on our Site that have been visited). We may also use cookies that exist only temporarily during an online session (session cookies) – these cookies allow us to identify you temporarily as you move through the Site. Most browsers allow users to refuse cookies, but doing so may impede the functionality of some portions of our Site.

**Web Beacons.** Web beacons are tiny graphics with a unique identifier, similar in function to cookies, that are used to track the online movements of Web users, or emails. In contrast to cookies, which are stored on your computer's hard drive, Web beacons are embedded invisibly on webpages or within emails, and may not be disabled or controlled through your browser. We or our third-party service providers

may use web beacons to track Site activity. We may also use them within our HTML-based emails, to let us know which emails have been opened by recipients, allowing us to gauge the effectiveness of certain communications. For information on how to opt-out of receiving marketing communication from Hortiki Plants, please see the section "Newsletters & Marketing Communications" below.

**Third Parties.** As noted, we may also engage third parties, such as Google Analytics, to track and analyze Site activity on our behalf. To do so, these third parties may place cookies or web beacons to track user activity on our Site. We use the data collected by such third parties to help us administer and improve the quality of the Site and to analyze usage of the Site. We do not provide these third parties with your Personal Information.

### **Third-Party Links**

At times, our Site may contain links to other, third-party websites. Any access to and use of such linked websites is not governed by this Privacy Policy, but, instead, is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

### **Newsletters & Marketing Communications**

If you consent to receive marketing communications from us, we may send you emails from time-to-time, about information that we believe may be of interest to you, including our newsletter. If, at any time, you would like to stop receiving these e-mails, you may follow the opt-out instructions contained in any such e-mail. Please note that it may take up to 7 business days to process opt-out requests. You may also receive periodic mailings from us at your postal address, sharing sales, product launches, or sending you information on upcoming events.

### **How To Access to Your Personal Information**

In most cases, you have the right to access, and to amend where incorrect, the information you have provided to us, including the permissions you have given us to display certain information about your profile. To review and correct personal data you can login into your account and click on the edit settings.

### **International Transfers of Personal Data**

Hortiki Plants is headquartered in the United States. Any Personal Information you submit to us online will be transferred to and stored in the United States, by Hortiki Plants. In addition, the Personal Information collected on our Sites may be transferred to, stored and processed in the European Economic Area or any other country in which Hortiki Plants or its subsidiaries and affiliates reside. By choosing to use our Sites and to provide us this data, you consent to any such transfer, storage and processing of information outside the jurisdiction in which you reside.

## **Security**

We use commercially reasonable physical, technical and administrative measures to protect the security of the Personal Information that we collect through the Site. Despite our efforts, no data security measures can guarantee 100% security all of the time.

## **We Have The Right To Terminate**

We have the right to discontinue, suspend or terminate on our Site and/or your use of our Site at any time, including any time we determine, in our sole judgment, you, your use of our Site, your Content and/or any Posting you make does or may violate our Terms of Use, Privacy Policy and, in addition to any other rights and remedies we may have under these Terms of Use, or at law or in equity, we have the right to: (i) refuse to allow you further Posting; (ii) remove or delete Postings; (iii) revoke your right to use our Site; (iv) use any technological, legal, operational or other means available to enforce our Terms of Use, including blocking specific IP addresses or deactivating.

## **Changes to this Privacy Policy**

We may change this Policy from time to time and encourage users to review it on a regular basis. We will post any changes to our policy to our If we make any changes to this Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by whatever method we deem appropriate, such as by highlighting the change on the Site or sending an email to you at the email address that you have registered with us.

## **Contact Us**

If you have any questions, comments or concerns about this Privacy Policy, please contact us at .