

U.S. Smokeless Tobacco Co. VERVE® Brand Website

PRIVACY STATEMENT AND YOUR PRIVACY RIGHTS

EFFECTIVE DATE: AUGUST 19, 2018

This Privacy Statement explains how we treat the personal information we collect from and about you on U.S. Smokeless Tobacco Company's VERVE® brand website ("chewonverve.com") and contact list. This Privacy Statement does not apply to U.S. Smokeless Tobacco Company websites that do not display this statement or that have their own privacy statements.

This Privacy Statement may be amended from time to time.

ACCESS AND USE RESTRICTIONS

You must affirm or we must independently verify that you are 21 years of age or older to use this website. We restrict the VERVE® brand contact list to individuals who have certified that:

They are adult tobacco consumers;

They are 21 years of age or older; and

They want to be added to our brand contact lists to receive content, offers, and advertising from U.S. Smokeless Tobacco Co. and its affiliates.

We independently verify that you are 21 years of age or older before granting access to create a website account, buying VERVE® products, and adding you to our brand contact list.

WHAT WE COLLECT

We collect information from you and your devices. We also receive information about you from third parties.

We collect information you provide to us:

Registering with our website: When you request to be added to our brand contact list, create a website account, or buy VERVE® products on the website, we ask you to provide personal information to verify your age and identity, and to communicate with you. Personal information you may share with us includes:

For verifying age and identity: your name, address, date of birth, and if applicable, the last four digits of your Social Security Number. We may also request additional information from you to assist us with verification.

For joining our brand contact lists: your name, address, date of birth, email address, telephone number, username and password, 5-digit PIN, security question and answer. If applicable, we will also collect your payment information such as credit card details.

On our website: Upon creating your account, we may ask you to provide information such as product, brand preferences, or other survey data. In addition, we may ask you to provide your telephone number or communication channel preferences.

We collect information passively:

Website browsing information: When you visit our branded website, your browser may send certain information such as browser type, browser language preference, operating system, internet service provider, Internet Protocol (IP) address, device identifiers, geo-location data, and online browsing data (such as date and time of access to our website, mouse movements, referring website address, pages viewed, features used, links clicked, and other actions you take in connection with the website, sometimes referred to as “clickstream data”).

Tracking information: When you visit our website, automated collection tools such as “cookies” and “web beacons” may gather information about your visit and your device.

A cookie is a small text file stored on your device that lets us know whether you’ve visited the website before as well as your navigation experience during your visit. Cookies may be used to facilitate your access to our website, enhance and personalize your online experience, personalize advertising, and recognize your computer or your device.

Web beacons are small graphics placed on our website and in email communications that are used to measure the effectiveness of our website and email communications.

Web beacons on our website collect information about your visit, such as the pages you view, the features you use, the links you click, and other actions you take in connection with our website.

Web beacons in our emails track your interactions with those messages, such as when you receive, open, forward, or click a link in an email message from us.

We may use third-party web analytics services on our website, such as Google Analytics, that analyze how a visitor uses our website. To learn more about Google Analytics and how to opt out, please visit <http://www.google.com/analytics/learn/privacy.html>

We collect information from third parties:

We collect information about you from third-party sources, such as public and third-party databases. We also collect information about you from our business and trade partners to supplement information about you. For example, we may purchase information about your interests and hobbies to help us tailor our marketing content and communications to you. We may also receive information about you from our third-party business partners, such as your tobacco product purchase history.

WHY WE COLLECT INFORMATION ABOUT YOU

We collect information about you for marketing purposes, as well as for other purposes that include but are not limited to:

- Customize our communications with you and provide personalized content, offers and advertising, including on our website.
- Conduct the purchase transaction e.g., for payment processing
- Administrative purposes, such as to assist you with registration on our branded website and brand contact list or to respond to inquiries from you.
- Administer offers, promotions and surveys.
- Communicate with you about tobacco-related issues.
- Operate, evaluate, and improve our business (including developing and enhancing products, managing communications, determining the effectiveness of our sales, marketing and advertising, performing accounting, auditing, billing, reconciliation and collection activities, and analyzing and enhancing our branded website).
- Perform data analyses and other processing (including market and consumer research, trend analysis, and financial analysis).
- Protect against and identify fraud and other criminal activity or to exercise or defend legal claims.

WITH WHOM DO WE SHARE INFORMATION ABOUT YOU?

Our Affiliates. We may share your information with U.S. Smokeless Tobacco Co. affiliates, including other subsidiaries of Altria Group, Inc., that market tobacco products such as those found at the following link: <http://www.altria.com/About-Altria/At-A-Glance/Pages/default.aspx>

Others Working for Us. We may share your information with third parties that perform services on our behalf, including running our website, sending communications for us, performing age and identity verification, payment processors that process and fulfill your orders, and executing marketing programs and promotions. When we contract with these third parties, we do not permit them to use or disclose your information for any purpose other than the work they are doing on our behalf or as required by

law. However, in limited exceptions, we may share your information with these third parties without an ability to contractually restrict how the third parties use the information. For example, we use Google ReCAPTCHA to limit fraudulent activity on our website, Google Analytics to analyze how visitors use our website, and Google Maps to help you search for retail locations.

Other Third Parties. We may share your information about you (i) if we are required to do so by law or legal process, (ii) if we believe there has been a violation of our website policies, (iii) to law enforcement authorities or other government officials or (iv) when we believe disclosure is necessary or appropriate to prevent injury, harm or financial loss or in connection with an investigation of suspected or actual illegal activity.

Corporate Restructure. We may transfer information about you in the event of a liquidation, reorganization, merger, consolidation, change of control, asset or stock acquisition/disposition or other corporate combination. Should such an event occur, we will use reasonable efforts to ensure the transferee uses your information in a manner consistent with this Privacy Statement.

HOW YOU CAN CONTROL YOUR INFORMATION

Opting Out. If you would like to stop receiving marketing communications from us, click on the “Remove Your Name” link located on the Login Page of this website or call 1-855-837-8464. Even if you opt out of receiving marketing messages, we will still send you messages about your questions and purchases and your existing or past business relationships with us.

Your Browser Settings. Your browser may give you the ability to control cookies or other tracking tools. The Help portion of the toolbar on most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to delete existing cookies. Note that if you choose to disable cookies, it is possible that some of our website’s features may not function properly. Choices you make are browser and device specific. For more information on deleting or controlling cookies, visit www.aboutcookies.org.

Do Not Track Requests. Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals.

Making Changes to Your Information. You can update certain information associated with your account by contacting customer service at 1-855-837-8464 or when available on the site, by logging into your profile.

Contact Us. If you have any questions or comments about this Privacy Statement, or you would like us to update information about you, please call 1-855-837-8464.

NOTICE TO CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

If you reside in California, you have the right to ask us one time each year for information identifying any third parties with whom we have shared your personal information for their direct marketing purposes. You can also request a description of the categories of personal information disclosed to that third party in the preceding calendar year. To make such a request, please call 1-855-837-8464. Indicate that you are a California resident making a “Shine the Light” inquiry.

HOW WE PROTECT YOUR INFORMATION

We recognize the importance of maintaining the security of your information. We have implemented technical, administrative and physical security measures designed to protect your information from unauthorized access, disclosure, use, and modification. Unfortunately, guaranteed security does not exist on the Internet or offline. We therefore cannot guarantee that your information will be free from unauthorized access by third parties.

LINKS TO THIRD-PARTY WEBSITES

From time to time, we may provide links to unaffiliated third-party websites. These websites operate independently from U.S. Smokeless Tobacco Co. and may have their own privacy statements in place, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not operated by or on behalf of U.S. Smokeless Tobacco Co., we are not responsible for their content or your use of the websites.

CHANGES TO THIS PRIVACY STATEMENT

This Privacy Statement may be updated periodically and will be posted on our website, indicating when it was last updated. If there are material changes to our Privacy Statement, we will post a prominent notice on our website and/or provide other notice as required by law. Use of our website following such changes constitutes your acceptance of the revised Privacy Statement then in effect.