

## **PRIVACY POLICY**

# **HOW OTB GLOBAL ENTERPRISES INC (AND RELATED ENTITIES AND PARTIES) USES YOUR INFORMATION**

OTB Global Enterprises Inc, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties, ("OTB") are committed to respecting your privacy and to complying with applicable data protection and privacy laws. OTB's privacy policy explains how OTB collects, uses, shares and protects your personal information. If OTB updates this policy, OTB will post any changes on OTB's website.

You acknowledge that by providing your personal information to OTB Global Enterprises Inc, CC2 Global Cigars, King's Ransom Cigars, affiliates, related entities or related parties, you consent to the processing of your data in accordance with your Data Privacy Statement. You should read this notice in conjunction with the Terms and Conditions of use for OTB's website, applications and products and services.

## **COLLECTING YOUR PERSONAL INFORMATION**

OTB Global Enterprises Inc, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties, ("OTB") can get your personal information when you:

- Buy product(s) from OTB, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties (including buying products in person, online or over the phone), from an approved participating distributor, request, inquire, or participate in the KR Royalty Club or other related program(s)
- Subscribe to any newsletters, alerts or other services from OTB, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties
- Ask for more information about product(s), or contact OTB with a question or complaint
- Visit or browse OTB's, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties linked or related websites

OTB may collect information about you from other organizations, if appropriate. These include fraud-prevention agencies, business directories and credit reference agencies. OTB may also collect information about you from other companies, our business, or joint venture partners. OTB may also use cookies

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(small text files stored in your browser) and other techniques such as web beacons (small, clear picture files used to follow your movements on our website). This collected information may inform OTB how you use our website. This helps OTB to make OTB's and related websites relevant to your interests and needs. OTB may use a persistent cookie (a cookie that stays linked to your browser) to record your details so we can recognize you if you visit our website again. *(See the next section for more details).*

You can choose to refuse cookies or set your browser to let you know each time a website tries to set a cookie.

## THE PERSONAL INFORMATION OTB COLLECTS

The information OTB Global Enterprises Inc, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties, ("OTB") collects about you depends on the OTB's products you use, purchase and inquiries made. It includes, but is not limited to the following:

- Your name, address, phone number, date of birth and email address
- Credit or debit card information, information about your bank account number and sort code or other banking information to include wiring information and instructions
- Identification information – such as passport identification number, tax registration number or social security number, driver's license, address, shipping and mailing information
- Your preferences for particular products, services or lifestyle activities when you tell OTB what they are, or when OTB assumes what they are, depending on how you use OTB products
- Your contact with OTB – such as a note, fax, email, or letter you send to OTB or other records of any correspondence and contact you have with OTB
- Your account information – such as order frequency, dates of payment owed and received, and any other information related to your account

## USING YOUR PERSONAL INFORMATION

OTB Global Enterprises Inc, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties, ("OTB") may use and analyze your information to:

- Process the products, you purchase from OTB and keep you updated with your order progress and future purchases

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- Process the participation in the KR Royalty Club or other related program(s)
- Keep you informed about current and new products, services, and club membership details (unless you choose not to receive marketing messages)
- Contact you with offers or promotions (unless you choose not to receive these messages)
- Bill or charge you for purchasing OTB's products or to take the appropriate amount of payment from you
- Respond to any questions or concerns you may have pertaining to OTB's products and club membership
- Inform you about other related and nonrelated company's products that may interest you (including offers and discounts)
- Carry out research and statistical analysis including monitoring how customers use OTB's products or club membership on an anonymous or personal basis
- Prevent and detect fraud or other crimes, recover debts, or trace those who owe OTB money

OTB will store your information for as long as OTB is required to do so. If there is no legal requirement, OTB will only store it for as long as determined by OTB.

### **Sharing your personal information**

OTB Global Enterprises Inc, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties, ("OTB") may share information about you with:

- Partners, affiliates, distributors, or agents involved in delivering the products you have ordered, purchased, used, or participated
- Credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies
- Debt collection agencies or other debt recovery organizations
- Law enforcement agencies, regulatory organizations, courts or other public authorities as authorized by law

OTB will release information if it is reasonable for the purpose of protecting OTB against fraud, defending OTB's rights or property, and protecting the interests of customers.

Should OTB be reorganized or sold to another organization or company, OTB may transfer any personal information held about you to that organization or company.

### **Keeping your personal information secure**

Communications over the internet (such as emails) are not secure unless they have been encrypted. Your communications may go through a number of countries before being delivered, as this is the nature of the Internet. OTB cannot accept responsibility

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for any unauthorized access or loss of personal information that is beyond OTB's control.

## **PAYMENT SECURITY**

The internet is not a secure medium. However, OTB Global Enterprises Inc, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties, ("OTB") takes reasonable technical and organizational precautions to prevent the loss, misuse, or alteration of your personal information. OTB has put in place various security procedures as set out in this policy. For example, security and privacy policies are periodically reviewed and enhanced as necessary and only authorized personnel have access to user information. OTB uses secure server software (SSL) to encrypt financial information you input before it is sent, and databases are hosted in a secure data center. While OTB cannot ensure or guarantee that loss, misuse, or alteration of data will not occur, OTB will use its best efforts to prevent this.

### **Your privacy rights**

If you believe if OTB Global Enterprises Inc, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties, ("OTB") is holding inaccurate information about you, please contact customer services team via email at [info@OTBGEI.com](mailto:info@OTBGEI.com) or [info@OTBGEI.BB](mailto:info@OTBGEI.BB) or via telephone at [1-246-228-4400](tel:1-246-228-4400).

If you no longer want to receive marketing messages from OTB Global Enterprises Inc, CC2 Global Cigars, King's Ransom Cigars, KR Royalty Club, affiliates, related entities and related parties, ("OTB") please contact customer services team via email at [info@OTBGEI.com](mailto:info@OTBGEI.com) or [info@OTBGEI.BB](mailto:info@OTBGEI.BB) or via telephone at [1-246-228-4400](tel:1-246-228-4400) and upon request you will be 'opted out'.