

PRIVACY POLICY

This website, www.cubaoutdoors.com (the "Website"), is owned and operated by Cuba Outdoors Inc, a Florida corporation, with its principal place of business at 78 SW 7th Street, Miami, FL 33130 (collectively, "COI" "we," "us," or "our"). This Privacy Policy applies to the entire COI's family of products and services, such as our online services, our print publications, our call center services, and other products or services (collectively "Products and Services"). This Privacy Policy is part of our Terms and Conditions, and all other terms related to the Products and Services. This Privacy Policy describes how we collect, use, transfer and disclose personally identifiable information ("Personal Information" as defined below) that we may obtain about you through this Website. By using this Website or submitting any Personal Information to www.cubaoutdoors.com, you acknowledge that you have read, understood and agree to be bound by this Privacy Policy.

COI, together with its directors, employees, agents, suppliers, partners, and content providers is committed to protecting your personal and financial information. In the course of providing financial products and services, we need to collect and maintain certain nonpublic personally identifiable information about you. We may use this personal information about you to service and maintain your account, process transactions in your account, facilitate communication between you and other users, respond to inquiries from you or your representative, develop, offer, and deliver products and services, or to fulfill legal and regulatory requirements. We will not sell, rent, license, or disclose any of your nonpublic personally identifiable information to any nonaffiliated third parties except as described herein.

When you visit our Website, we may collect technical and navigational information, such as computer browser type, Internet protocol address ("IP address"), pages visited, general statistical and tracking information, your computer operating system and browser information, and average time spent on our Websites. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our Web design and functionality. To maintain security of your online session and prevent unauthorized users from accessing your account we use firewall barriers, encryption techniques, and authentication procedures.

If you decide to close your account, COI will continue to adhere to the Privacy Policy and practices described in this notice.

Transparency is our goal. We want to inform you clearly about our use of your Personal Information so that you can make meaningful choices about what information you share with us.

1. Information Collected

We collect information about our users in four ways: directly from the user, from our web server logs, through cookies, and from third parties with whom we may contract with to perform certain functions or serves on our behalf. The following information may be collected:

- *Personal Information*

"Personal Information" refers to information that tells us specifically who you are, such as your name, phone number, email, postal address, and possibly information relating to certain support or customer service issues. In many cases, we need this information to provide to you many of the services that you may have requested.

- *Cellular Phone Numbers*

By providing a cellular telephone number to us, you expressly consent to, and authorize us or a third party on our behalf to deliver autodialed or prerecorded telemarketing calls and/or text

messages to the number you provide. You are not required to consent to these calls as a condition to purchasing any goods or services, but withholding your consent may prevent us from providing certain services to you. This consent encompasses all future autodialed or pre-recorded telemarketing calls and text messages from us or a third party placing these calls on our behalf.

- *Submission of Reviews, Rating, and Comments*

We collect information that you voluntarily provide as part of the Products and Services, including messages, posts, comments, responses, reviews, and ratings you submit through the Products and Services, ("User Content"). COI may in our sole discretion share your User Content with others such as your business reviews. If you do not want certain information shared with others, you should not submit User Content, or should not submit User Content that contains information or Personal Information you do not want shared in this manner. Once you have submitted User Content, we reserve the right to publish it in any medium to others.

- *Aggregate Information*

We may collect general, non-personal, statistical information about the use of the Products and Services, such as how many visitors visit a specific page on the Website, how long they stay on that page, and which hyperlinks, if any, they click on. This information represents a generic overview of our users, including their collective viewing habits, and allows us and other third parties to modify information, promotions, offers and/or discounts on products and services based on user traffic and behavior. We collect this information through the use of technologies such as 'cookies' and web beacons, which are discussed in greater detail below. We collect this information in order to help enhance the Site and Services to make for a better visitor experience.

- *Third Party Information*

We may supplement information you provide to us with information from other sources, such as information to validate or update your address, payment card or other demographic and lifestyle information. We use this information to help us maintain the accuracy of the information we collect, to enable us to fulfill our products and services, to target our communications so that we can inform you of products, services and offers that may be of interest and for internal business analysis or other business purposes consistent with our mission.

- *Cookies*

COI may automatically collect non-personally identifiable information and data through the use of cookies. Cookies are small text files a website uses to recognize repeat users, facilitate the user's ongoing access to the website and facilitate the use of the website. Cookies also allow a website to track usage behavior and compile site usage information that will allow for the improvement of content and target advertising. Most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set your browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser. However, please be aware that some features of our Site and Services may not function or may be slower if you refuse cookies. You may also get cookies from our advertisers or other third parties with links on the Site as described below. We do not directly control these cookies. The use of advertising cookies sent by third party ad servers is standard in the Internet industry.

- We may use the services of third parties to collect and use anonymous information about your visits to and interactions with our website through the use of technologies such as cookies to personalize advertisements for goods and services. To learn more, or to opt-out of receiving online display advertisements tailored to your interests by our third party partners, visit the

Network Advertising Initiative at www.networkadvertising.org/choices.

- *Other Tracking Technologies*

Tracking technologies may record information such as Internet domain and host names; Internet protocol (IP) addresses; browser software and operating system types; clickstream patterns; and dates and times that our Site and Services are accessed. An IP address is a number that is automatically assigned to your computer whenever you are surfing the web. Web servers, the computers that 'serve up' web pages, automatically identify your computer by its IP address. The Products and Services may also use technology called "tracer tags". These may also be referred to as "Pixels", "Clear GIFs" or "Web Beacons". This technology allows us to understand which pages you visit on the Website and other ways you interact with our Products and Services, such as purchases made through the Website. These tracer tags are used to help us to optimize and tailor our Products and Services for you and other users of the Website. We may link the information we record using tracking technologies to Personal Information we collect.

2. Use of Information

The information COI collects is used in a variety of ways, including

- for internal review;
- to improve the Products and Services;
- to optimize third-party offers of products and/or services;
- to verify the legitimacy of reviews and ratings;
- to notify you about updates to the Products and Services;
- to let you know about products, services, and promotions that you may be interested in;
- to get reviews and ratings;
- for our marketing purposes and the marketing of discounts offered through our Products and Services by a variety of service providers, including health care and wellness providers (collectively, "Service Providers");
- to fulfill and provide products and services, including personalized or enhanced services, requested by you; and
- internal business analysis or other business purposes consistent with our mission; and to carry out other purposes that are disclosed to you and to which you consent.

3. Disclosures and Transfers of Information

We do not disclose Personal Information to third parties, except when one or more of the following conditions is true:

- We have your permission to make the disclosure;
- The disclosure is necessary for the purpose for which the personal information was obtained;
- The disclosure is to financial service providers in order to fulfill and carry out the purchase and provision of goods and services requested by you;
- The disclosure is permitted by relevant law;
- The Personal Information to be disclosed is otherwise publicly available in accordance with the applicable law;
- The disclosure is reasonably related to the sale or other disposition of all or part of our business or

assets;

- The disclosure is for our own marketing purposes, or, with your authorization, for the marketing purposes of third parties;
- The disclosure is combined with information collected from other companies and used to improve and personalize services, content, and advertising from us or third parties;
- The party to whom the disclosure is made controls, is controlled by, or is under common control with COI;
- The disclosure is in our sole discretion necessary for the establishment or maintenance of legal claims or legal compliance, to satisfy any law, regulation, subpoena or government request, or in connection with litigation;
- The disclosure is in our sole discretion about users who we believe are engaged in illegal activities or are otherwise in violation of our terms and conditions, even without a subpoena, warrant or court order; or
- The disclosure is to outside businesses to perform certain services for us, such as maintaining our Site and Services, mailing lists, processing orders and delivering products and services, sending postal mail, processing claims for lost or stolen certificates, providing marketing assistance, and data analysis ("Administrative Service Providers"), including Administrative Service Providers outside the country or jurisdiction in which you reside.

Prior to sharing of your Personal Information with others, agreements are made between COI and such outside parties to whom we are transferring data to provide for the allowable use and security of the transferred information in accordance with this Privacy Policy and applicable law.

We may provide certain Personal Information as a service to others for their marketing purposes. We may also disclose your name and address to Service Providers when you submit User Content relating to those Service Providers. If you properly notify us that you no longer want us to share your Personal Information, we will cease sharing your Personal Information. However, except as otherwise stated in this Privacy Policy, we do not directly control the third parties to which we share such Personal Information and you will need to further notify such third parties directly if you would like them to cease use of your Personal Information.

We may also disclose aggregate visitor data in order to describe the use of the Products and Services to our existing or potential business partners or other third parties, or in response to a government request. We may also share aggregated demographic and preference data with third parties to enable the provision of targeted information, promotions, offers and/or discounts on products and services.

4. Accessing Your Information and Opt-in/Opt-out Requests

To help you review, edit, and control how we use much of the information we collect about you, you can visit your "Manage My Accounts" webpage. On the "Manage My Accounts" webpage, you can update certain information and unsubscribe from receiving specific types of email messages and telephone calls, including autodialed or pre-recorded telemarketing calls placed by us or a third party on our behalf. You cannot, however, unsubscribe from receiving certain emails, such as account status and billing related emails, unless you close your account and fulfill any existing contractual obligations.

You can also ask us whether we are keeping information about you; to provide you with access to any information we have about you; how your information is being used; update, correct, or delete your information, or opt-out of the collection and use of certain information by sending an email to info@cubaoutdoors.com, specifying the nature and scope of your request. If you choose to delete your information or opt-out of the collection and use of your information, you understand that certain services, may no longer be available to you, potentially including revocation of your User

privileges. Please state in your correspondence the details of your request. We may require proof of your identity before we provide you with the requested information. We allow you to challenge the data that we hold about you and, where appropriate, you may have the data erased, rectified, amended, or completed. Approved requests will be processed within ten (10) days of the date on which we receive the request.

5. Use of Non-Personal Information

We may collect information about you that is not Personal Information (“Non-Personal Information”). We may share Non-Personal Information with third parties to permit third parties to place cookies, tags, web beacons, and other tools on your computer. You may block or disable cookies on your computer that will restrict the collect of Non-Personal Information, but doing so may prevent you from accessing certain functionalities on our Website.

6. Children's Privacy

This Website is intended to be used by adults. It is not intended for children. COI does not knowingly collect or solicit personal information from anyone under the age of eighteen (18) or knowingly allow such persons to register. If you are under 18, please do not send any information about yourself to us, including your name, address, telephone number, or email address. No one under age 13 is allowed to provide any personal information to COI. In the event that we learn that we have collected personal information from a child under age 18 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 18, please contact us at info@cubaoutdoors.com.

7. Third Party Websites

When you select a link to a third-party site, you are subject to the privacy and security policies of the third party and COI's Policy is no longer in effect. COI does not control the privacy policies or the privacy practices of any third parties. We are not responsible for the practices employed by Websites linked to or from our Website nor the information or content contained therein. Your browsing and interaction on any other Website, including those that have a link on our Website, is subject to that Website's own rules and policies. Please read over those rules and policies before proceeding.

8. Data Security

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your Personal information from unauthorized access and disclosure. We use encryption in the transmission of your Personal information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your Personal information.

No system can be completely secure. Therefore, although we take steps to secure your information, we do not promise, and you should not expect, that your Personal information, searches or other communications will always remain secure. No data transmission over the Internet can be guaranteed to be completely secure. Despite our efforts, COI cannot guarantee or warrant the security of any information you transmit to us. You should also take care with how you handle and disclose your Personal information. Please refer to the Federal Trade Commission's website (<https://www.ftc.gov/about-ftc/bureaus-offices/bureau-consumer-protection>) for information about how to protect yourself against identity theft.

9. Access to Your Information

You can request access, and the opportunity to correct and update your Personal Information by contacting COI as described at the end of this Privacy Policy.

10. Links to Other Internet Websites

The privacy practices set forth in this Privacy Policy are for this Website and other specified activities only. If you link to or otherwise visit any other websites managed by third parties, please review the privacy policies posted on those sites. COI has no control over those websites and is not responsible for the practices followed by third parties.

11. Notification of Changes

COI may update this Privacy Policy from time-to-time in our sole discretion. If at any point we decide to use Personal Information in a manner different from that stated at the time it was collected, we will notify you. It is your responsibility to review the Privacy Policy for any changes each time that you use the Site and Services and you are bound by such changes. Use of the Site and Services by you following us posting a new Privacy Policy on our Site constitutes your acceptance of the Privacy Policy as modified. We will use Personal Information in accordance with the Privacy Policy under which the information was collected.

12. Deactivating and Deleting Your Account

If you submit a request to deactivate your account by emailing info@cubaoutdoors.com, your account will be suspended and other users of the Website will be unable to view any information or content provided by you, until such time as COI receives a request from you to reactivate your account. If you submit a request to delete your account to info@cubaoutdoors.com, all information and content you provided to us will be deleted permanently, with the exception of any information and/or User Content posted by you on Service Provider accounts of the Website, which will remain after your account is deleted.

13. Acceptance of Privacy Policy

By using our Website, you signify your assent to our Privacy Policy. If you do not agree with this Privacy Policy, please do not use our Website. Your continued use of this Website following posting of changes to these Terms will mean you accept those changes.

14. Contact

If you have any questions about this Privacy Policy or our privacy practices, please contact us at: info@cubaoutdoors.com

Effective Date: July 4, 2018