

The Odom Corporation and its affiliates (also collectively referred to as “we”, “our”, and “us”) are concerned about privacy issues and want you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect through activities that reference this Privacy Policy, including websites (our “Websites”), rewards programs, contests, and email messages. By providing Personal Information to us, you agree to the terms and conditions of this Privacy Policy.

PERSONAL INFORMATION

Personal Information We May Collect

“Personal Information” is the information that identifies you as an individual, such as:

- Name
- Postal (address including billing and shipping addresses)
- Telephone number (including home and mobile phone numbers)
- Email address
- Credit and debit card number
- Social Security number
- Photograph
- Country of residence

In some cases, we may use a third-party payment service to process purchases and/or collect donations. In these cases, your Personal Information may be collected by this third party and not by us, and will be subject to the third party’s privacy policy, rather than this Privacy Policy. We have no control over, are not responsible for, this third party’s use or disclosure of your Personal Information.

If you submit any Personal Information relating to other people to us or to our service providers, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

How We May Collect Personal Information

We and our service providers may collect Personal Information in a variety of ways, including:

- **Through the Websites:** We may collect Personal Information through the websites, e.g., when you contact us or make a purchase.
- **Offline:** We may collect Personal Information from you offline, such as when you contact customer service, or complete an application or survey or enter a contest.
- **From Other Sources:** We may receive your Personal Information from other sources, such as public databases; joint marketing partners from people with whom you are associated, as well as from other third parties.

To the extent permitted by applicable law, the Personal Information you provide may be combined with Personal Information and Other Information that you provide to us (via online or offline means), that is publically available, or that we may otherwise obtain online or offline.

How We May Use Personal Information

To the extent permitted by applicable law, we may use Personal Information:

- to respond to your inquires and fulfill your requests, such as to send you newsletters or to respond to your questions and comments.
- to send administrative information to you, for example, information regarding changes to our terms, conditions, and policies.
- to complete and fulfill your purchase and/or your donation, for example, to process your payments, have your order delivered to you, communicate with you regarding your purchase and provide you with related customer service.
- to provide you with updates and announcement concerning our products, promotions and programs and to send you invitations to participate in special programs.
- to re-contact you if we have not heard from you in a while.
- to send you advertising/promotional material from any of our affiliates, and from our promotional and strategic partners.
- to process rewards, prizes, and donations, as applicable.
- to allow you to participate in polls, sweepstakes, instant win promotions, contests and other promotions and to administer these activities. Some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Information, so it is important that you read the additional rules carefully.
- for our business purposes, such as analyzing and managing our businesses, market research, audits, developing new products, enhancing our websites, improving our services and products, identifying usage trends, determining the effectiveness of our promotional campaigns, tailoring the websites experience and content based on your past activities, and gauging customer satisfaction and providing customer service (including troubleshooting in connection with customer issues).
- as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, your or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

How Personal Information May Be Disclosed

To the extent permitted by applicable law, your Personal Information may be disclosed:

- to our affiliates for the purposes described in this Privacy Policy.
- to our third-party service providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, infrastructure provision, IT services, customer service, email delivery services, credit card processing, auditing services and other services, to enable them to provide services.
- to our third-party strategic partners with whom we may enter into a special relationship. We will provide you with choices regarding this sharing prior to sharing your Personal Information with a particular strategic partner. Because these third parties will use your Personal Information in accordance with their own privacy practices, you should check their websites for information regarding their privacy practices, you should check their website for information regarding their privacy practices.
- In connection with promotions, for example, to third parties that are sponsors of sweepstakes, instant win promotions, contests and other promotions, to provide lists of the names and countries of residence of winners and/or to announce the names of visitors on the websites or otherwise in accordance with the rules applicable to the applicable promotion. To the extent that the terms and conditions of the rules concerning the treatment of your Personal Information conflict with this Privacy Policy, the terms and conditions of the rules shall control.
- to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- as we believe to be necessary or appropriate: (a) under applicable law; (b) to comply with legal process; (c) to respond to requests from public and government authorities; (d) to enforce our terms and conditions; (e) to protect our perorations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

OTHER INFORMATION

Other Information We May Collect

“**Other Information**” is any information that does not reveal your specific identity, such as:

- Demographic information and other information provided by you
- Location information
- Aggregated information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then, in addition to the uses listed in the “How We May Collect Other Information” section below, we may use and disclose Other Information for all the purposes for which we use and disclose Personal Information.

How We May Collect Other Information

We and our third-party service providers may collect Other Information in a variety of ways, including:

- **From you:** Information such as date of birth, gender, personal characteristics, hobbies and interests, consumption habits, zip code, and your preferred means of communication, may be collected when you voluntarily provide it. Unless combined with Personal Information, this information does not personally identify you.
- **By aggregating information:** Aggregated Personal Information does not personally identify you or any other user of the sites (for example, we may use Personal Information to calculate the percentage of our users who have a particular telephone area code)

In some instances, we may combine Other Information with Personal Information (such as combining your name with your zip code). If we combine any Other Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is combined.

THIRD PARTY SITES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site to which these Websites contain a link. The inclusion of a link on the Websites does not imply endorsement of the linked site by us or by our affiliates.

Please note that the Websites may contain a link to e-commerce websites, including some e-commerce websites that are Coca-Cola branded. This Privacy Policy does not govern any e-commerce websites to which the websites may contain a link, unless such a website contains a link to this Privacy Policy. Any Personal Information that you provide through the e-commerce website will be subject to the privacy policy of the e-commerce site, and not this Privacy Policy. We have no control over, and shall not be responsible for, the use of information collected through the e-commerce site.

CAREERS

Any Personal Information submitted by employees or in connection with an application for employment will not be governed by this policy. Please contact the Human Resources Department if you have questions about how Personal Information submitted in connection with employment or with an application for employment will be used.

SECURITY

We use reasonable, organizational, technical and administrative measures to protect Personal Information under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us through the “Contact Us” page at www.odomcorp.com.

CHOICES AND ACCESS

Your choices regarding our use and disclosure of your Personal Information

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes.

- If at any time you wish to stop receiving phone, mail, SMS, and e-mail marketing communications from us, please just let us know by e-mailing, calling or writing to us through the “Contact Us” page at www.odomcorp.com or by using the unsubscribe feature in the marketing e-mail you received. In your request, please indicate that you wish to stop receiving e-mail marketing communications from us.
- In addition, we will not disclose your Personal Information to third parties, including our subsidiaries, for the third party’s direct marketing purposes if we have received and processed a request from you that your Personal Information not be shared with third parties for that purpose. If you would like to submit such a request, please just let us know by e-mailing, calling or writing to us through the “Contact Us” page at www.odomcorp.com. Please clearly indicate that your request that The Odom Corporation not disclose your Personal Information to its subsidiaries and/or third parties for their direct marketing purposes.

Please note that changes may not be effective immediately. We will endeavor to comply with your request(s) as soon as reasonably practicable. Please also note that if you do opt-out of receiving marketing-related messages from us, we may still send you important administrative messages, and you cannot opt-out from receiving administrative messages.

How you can access, change or suppress your Personal Information

To review, correct, update, suppress, delete or otherwise limit our use of your Personal Information that has been previously provided to us, please write to us through the “Contact Us” page at www.odomcorp.com and clearly describe your request.

In your request, please make clear what information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. We will try to comply with your request as soon as reasonably practicable. Note that despite our efforts, there may be residual information that will remain within our databases and other records, which will not be removed or changed. Further, please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase or promotion).

RETENTION PERIOD

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

SENSITIVE INFORMATION

We ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health or medical condition, criminal background or trade union membership) on or through the Websites or otherwise to us.

UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy. Please take a look at the “*Last Updated*” legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy on a Site. Your use of the Websites following these changes means that you accept the revised Privacy Policy.