

WEBSITE PRIVACY POLICY EFFECTIVE DATE: October 18, 2010

1. INTRODUCTION. Jefferson State Trading Company, Inc. (“us,” “we,” “Company,” or “Jefferson State”) is committed to respecting the privacy rights of its customers, visitors, and other users of the Company Website (“the Site”) at www.jeffersonstatetradingco.com and the services provided through the Site (the “Services”). We created this Website Privacy Policy (“Privacy Policy”) to give you confidence as you visit and use the Site, and to demonstrate our commitment to fair information practices and the protection of privacy. This Privacy Policy is only applicable to the Site, and not to any other websites that you may be able to access from the Site, each of which may have data collection, storage, and use practices and policies that differ materially from this Privacy Policy.

BY USING THE SITE, YOU AGREE TO BE BOUND BY THE TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THESE TERMS, PLEASE DO NOT USE THE SITE.

2. TYPES OF INFORMATION COLLECTED

(2.1) TRAFFIC DATA COLLECTED. We automatically track and collect the following categories of information when you visit our Site: (1) IP addresses; (2) domain servers; (3) types of computers accessing the Site; and (4) types of web browsers used to access the Site (collectively “Traffic Data”). Traffic Data is anonymous information that does not personally identify you but is helpful for marketing purposes or for improving your experience on the Site.

We also may use small pieces of information that a website sends to your computer’s hard drive while you are viewing the site (“cookies”) to customize content specific to your interests, to ensure that you do not see the same advertisement repeatedly, and/or to store your password so you do not have to re-enter it each time you visit the Site. We may use both session cookies (which expire once you close your browser) and persistent cookies (which stay on your computer until you delete them). Persistent cookies can be removed by following your browser help file directions. If you choose to disable cookies, some areas of the Site may not work properly or at all.

(2.2) PERSONAL INFORMATION COLLECTED. In order for you to access certain services and to purchase items and products that we offer via the Site, we may require you to provide us with certain information that personally identifies you (“Personal Information”). Personal Information includes the following categories of information: (1) Contact Data (such as your name, mailing address, and e-mail address); and/or (2) Financial Data (such as your account or credit card number). If you communicate with us via e-mail, or otherwise complete online forms, surveys, or product reviews, any information provided in such communication may be collected as Personal Information.

We use commercially reasonable efforts to ensure that the collection of Personal Information is limited to that which is necessary to fulfill the purposes identified in Section 3, below. We will not use your information in a manner different than the purpose for which it is collected, without obtaining your consent prior to such use.

(2.3) POSTING. We store and may publicly display the information that you submit or post to the Site for public display, such as product reviews.

(2.4) CONTACTING JEFFERSON STATE. If you contact us to provide feedback, register a complaint, or ask a question, we will record any Personal Information and other content that you provide in your communication so that we can effectively respond to your communication. Any such contact with Jefferson State should be made pursuant to Section 9, below.

(2.5) ENFORCEMENT. We may use the information we collect in connection with your use of the Site or Services in order to investigate, enforce, and apply our Terms of Use and Privacy Policy.

3. USES OF INFORMATION COLLECTED

(3.1) COMPANY USE OF INFORMATION. We use Contact Data to send you information about our company or our products or services, or promotional material from some of our partners, or to contact you when necessary. We use your Financial Data to bill you for items and products.

(3.2) SHARING OF PERSONAL INFORMATION. We may share Contact Data and Financial Data with our business partners who assist us by performing core services (such as hosting, billing, fulfillment, or data storage and security) related to our operation of the Site. Those business partners have all agreed to uphold the same standards of security and confidentiality that we have promised to you in this Privacy Policy, and they will only use your Contact Data and other Personal Information to carry out their specific business obligations to Company.

4. CONFIDENTIALITY AND SECURITY OF PERSONAL INFORMATION. Except as otherwise provided in this Privacy Policy, we will keep your Personal Information private and will not share it with third parties, unless such disclosure is necessary to: (a) comply with a court order or other legal process; (b) protect our rights or property; or (c) enforce our Terms of Use. Your Personal Information is stored on secure servers that are not accessible by third parties. We provide you with the capability to transmit your Personal Information via secured and encrypted channels if you use a similarly equipped web browser.

Furthermore, your account is password protected. We limit the access to your Personal Information to those employees and contractors who need access to perform their job function. If you have any questions about the security on the Site, please contact us at webmaster@JeffersonStateTradingCo.com. Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that your Personal

Information will never be disclosed in a manner that is inconsistent with this Privacy Policy. YOU HEREBY ACKNOWLEDGE THAT JEFFERSON STATE IS NOT RESPONSIBLE FOR ANY SUCH INADVERTENT DISCLOSURES OR ANY INTERCEPTED INFORMATION SENT VIA THE INTERNET, AND YOU HEREBY RELEASE US FROM ANY AND ALL CLAIMS ARISING OUT OF OR RELATED TO THE USE OF INTERCEPTED INFORMATION IN ANY UNAUTHORIZED MANNER.

5. USER ABILITY TO ACCESS, UPDATE, AND CORRECT PERSONAL INFORMATION.

We maintain a procedure in order to help you confirm that your Personal Information remains correct and up-to-date. At any time, you may visit your account information on the Site. Through your account webpage you may: (a) review and update your Personal Information that we have already collected; (b) choose whether or not you wish us to send you information about our company, or promotional material from third parties.

6. OTHER PERSON'S INFORMATION. If you provide us with another person's e-mail address so we may invite that person to create an account on the Site, we will use this information only to contact that person about the invitation. By providing us with another person's e-mail address, you represent to us that you have obtained the consent of that person regarding the disclosure of their Personal Information to us. All invitees are provided with the option not to receive further invitations.

7. LOST OR STOLEN INFORMATION. You must promptly notify us if your credit card or password is lost, stolen, or otherwise used without permission. In such an event, we will remove that credit card number or password from your account and update our records accordingly.

8. PUBLIC INFORMATION. The Site contains links to other websites. We are not responsible for the privacy practices or the content of such websites. We also may make chat rooms, forums, message boards, product review boards, and news groups available to you. Please understand that any information that is disclosed in these areas becomes public information. We have no control over its use and you should exercise caution when deciding to disclose your Personal Information.

9. METHOD OF CONTACT. If you have a question or concern regarding this Privacy Policy, believe that this Privacy Policy has been violated, you may e-mail Jefferson State at [EMAIL ADDRESS] or write to the Jefferson State at the following address:

Privacy Policy Agent
Jefferson State Trading Company
P.O. Box 2102
McKinleyville, CA 95519

In your correspondence, please describe your question, concern, or complaint in as much detail as possible. We will investigate and respond to you promptly.

10. LINKS. The Site may contain links to third party websites with which we have no affiliation. Except as set forth above, we do not share your Personal Information with those third

parties, and are not responsible for their privacy practices. We suggest you read the privacy policies on all such third party websites.

11. **UPDATES AND CHANGES TO PRIVACY POLICY.** We reserve the right, at any time and without notice, to add to, change, update, or modify this Privacy Policy, simply by posting such change, update, or modification on the Site and without any other notice to you. Any such change, update, or modification will be effective immediately upon posting on the Site.