PRIVACY POLICY

Tomoro Retail Incentive Program
Effective Date: March 25, 2026 | Last Updated: [DATE]

1. Who We Are

This Privacy Policy describes how [TOMORO LEGAL ENTITY NAME], [REGISTERED ADDRESS] ("we," "us," or "our") collects, uses, shares, and protects personal information in connection with the Tomoro Retail Incentive Program ("Program") operated through the Program Website at promo.tomorovape.com.

The Program is operated using a third-party technology platform provided by a service provider engaged by us for program operations, hosting, and technical support. This service provider processes your data on our behalf and in accordance with this Privacy Policy.

2. Information We Collect

2.1 Information You Provide at Registration

- Full name (first and last)
- Email address
- Mobile phone number
- Store location (selected via store locator)

2.2 Information Collected During Participation

- City and state (required at first reward redemption)
- Code submission history (date, time, code identifier)
- Points balance and transaction history
- Reward redemption requests and delivery records
- Support requests and communications

2.3 Information Collected for Tax Compliance

If your total rewards reach $600.00 USD or more in a calendar year, we may be required to collect:

- Taxpayer identification number (via IRS Form W-9)
- Mailing address for tax reporting purposes

2.4 Information Collected for Identity Verification

Before your first reward redemption, we may request a photo of a government-issued identification document. This is used solely to verify that you are a real person matching your registration data and to prevent fraud.

2.5 Information Collected Automatically

When you access the Program Website, we may automatically collect:

- Device type and operating system
- Browser type
- IP address
- Pages visited and actions taken on the Program Website
- Date and time of access

3. How We Use Your Information

We use your personal information for the following purposes:

- **Program administration:** managing your account, processing code submissions, crediting points, and delivering rewards
- **Identity verification:** confirming your eligibility and preventing fraud
- **Communications:** sending Program-related notifications (points credited, reward delivery, account security alerts) via email, SMS, or through your personal account on the Program Website
- **Commercial communications:** contacting you regarding Tomoro product information, new launches, ordering, placement opportunities, and related business matters. These communications may come from our sales representatives, authorized agents, or third-party agencies acting on our behalf
- **Analytics and reporting:** generating aggregated, non-personally-identifiable reports on Program performance. Aggregated data may be shared with retail partners
- **Tax reporting:** filing IRS information returns (such as Form 1099-MISC or 1099-NEC) as required by federal and state law
- **Fraud detection and prevention:** monitoring for suspicious activity, duplicate

code submissions, and other violations of the Program Terms and Conditions

- **Legal compliance:** responding to valid legal process and complying with applicable laws and regulations

4. How We Share Your Information

We may share your personal information with the following categories of recipients:

- **Technology and service providers:** third-party platforms and services engaged by us for Program operations, hosting, technical support, email delivery, and SMS messaging. These providers process data on our behalf and are contractually required to protect your information.
- **Rewards fulfillment partners:** for the purpose of delivering gift cards and other rewards to you
- **Tax authorities:** as required by applicable federal and state law (e.g., IRS reporting for rewards exceeding $600/year)
- **Law enforcement and regulatory authorities:** in response to valid legal process, including subpoenas, court orders, or government investigations
- **Aggregated data to retail partners:** non-personally-identifiable, aggregated Program performance data may be shared with retail store owners and partners

We will not sell or rent your personal information to third parties for their own marketing purposes.

5. Data Security

We implement reasonable administrative, technical, and physical safeguards to protect your personal information against unauthorized access, alteration, disclosure, or destruction. These measures include encryption of data in transit, access controls, and regular security reviews.

No system is completely secure. While we take reasonable precautions, we cannot guarantee the absolute security of your information.

6. Communications and Your Choices

6.1 Program Communications

By registering, you consent to receive Program-related communications via email, SMS, and through your personal account on the Program Website. These include:

points credited notifications, reward delivery confirmations, account security alerts, and Program updates.

You cannot opt out of essential Program communications while your account is active. These are necessary for the operation of your account.

6.2 Commercial Communications

By participating in the Program, you consent to receive commercial communications from us regarding Tomoro products, new launches, ordering, and related business matters. These may be delivered via email, SMS, telephone, messaging through the Program Website, or in person at your retail location.

You may opt out of non-essential commercial communications at any time by:

- Contacting Program support at `[SUPPORT EMAIL]`
- Using the unsubscribe mechanism in any email communication

6.3 SMS Communications

If you register via phone number or provide a mobile number, you consent to receive SMS messages related to the Program. Standard message and data rates may apply. You may opt out of SMS communications by replying STOP to any message.

7. Data Retention

We retain your personal information for as long as your Program account is active, and for a reasonable period afterward as necessary to:

- Comply with tax reporting and recordkeeping requirements
- Resolve disputes and enforce our Terms and Conditions
- Meet legal and regulatory obligations

Tax-related records (including W-9 information and reward payment records) are retained for the period required by applicable federal and state tax law (generally at least 7 years).

After the applicable retention period, personal information is deleted or anonymized.

8. Data Breach Notification

In the event of a data breach involving your personal information (as defined by applicable law), we will notify affected individuals without unreasonable delay in

accordance with the Oklahoma Security Breach Notification Act (24 O.S. §§ 161-166).

If a breach affects 500 or more Oklahoma residents, we will also notify the Oklahoma Attorney General within the timeframe required by law.

9. Your Rights

Depending on your state of residence, you may have certain rights regarding your personal information, including:

- **Access:** the right to know what personal information we have collected about you
- **Correction:** the right to request correction of inaccurate personal information
- **Deletion:** the right to request deletion of your personal information, subject to legal and contractual retention requirements
- **Opt-out of communications:** the right to opt out of non-essential commercial communications

To exercise any of these rights, contact us at `[SUPPORT EMAIL]`. We will respond to verified requests within a reasonable timeframe.

Note: deleting your account or personal information may result in forfeiture of unredeemed points, as described in the Program Terms and Conditions.

10. Children's Privacy

The Program is not intended for persons under 21 years of age. We do not knowingly collect personal information from anyone under 21. If we become aware that we have collected personal information from a person under 21, we will promptly delete that information and deactivate the associated account.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. If we make material changes, we will notify you by posting the updated policy on the Program Website and updating the "Last Updated" date at the top. Your continued participation in the Program after such changes constitutes your acceptance of the updated Privacy Policy.

12. Contact Us

If you have questions about this Privacy Policy or our data practices, contact us at:

[TOMORO LEGAL ENTITY NAME]
[REGISTERED ADDRESS]
Email: [SUPPORT EMAIL]

This Privacy Policy applies solely to the Tomoro Retail Incentive Program and the Program Website at promo.tomorovape.com. It does not apply to other Tomoro websites, products, or services, which may have their own privacy policies.