

## **Email Privacy Policy**

Empire Merchants, LLC (“we” or “us”) has created this Email Privacy Policy to explain how we use, disclose and protect your email address.

### **Why did you receive a mailing from us?**

If you received a mailing from us, our records indicate that you have expressly shared your email address for the purpose of receiving information from us or provided it to another entity with permission to share the information with third parties, such as us. We respect your time and attention by attempting to make our emails valuable and informative.

### **How can you stop receiving email from us?**

Each commercial email sent by us contains an easy way for you to cease receiving further commercial email from us. We may also give you the ability to unsubscribe from receiving other types of email from us as well.

### **How we secure your information**

We have taken certain physical, electronic, contractual and managerial steps to safeguard and secure your name and email address.

### **How we may share your information**

We may share your name and email address with our suppliers and other strategic partners who may send you their own messages. From time to time, we may offer a program in which you are offered the opportunity to request that your email address be used in connection with the specific program. In that case, we will use reasonable commercial efforts to limit email use to the program requirements. However, we will not be liable for any inadvertent release of your email address.

In addition, because of the nature of our business, we may also share your name and email address information with our solicitors. Although our company policy forbids their use of your information for communications that are unrelated to our business, we cannot be responsible if a solicitor violates this policy.

We may also disclose your name and email address: (1) to our service providers, solely to enable them to perform a service for us; (2) as necessary to protect our rights or the rights of a third party; (3) to respond to judicial process and provide information to law enforcement agencies or otherwise as required by law; and (4) otherwise, with your consent. In addition, in the event that our company or substantially all of its assets are acquired, your personal information may be one of the transferred assets.

### **Use of Web Beacons**

When we send you emails, we may include a web beacon to allow us to determine the number of people who open our emails. When you click on a link in an email, we may record this individual response to allow us to customize our offerings to you. Web beacons collect only limited information, such as a cookie identifier, time and date of a page being viewed, and a description of the page on which the Web Beacon resides (the URL).

Web Beacons can be refused when delivered via email. If you do not wish to receive Web Beacons via email, you will need to disable HTML images or refuse HTML (select Text only) emails via your email software.

### **Changes**

We may change this policy from time to time. A link to the most recent policy will be included in each of our commercial emails.

### **Contact us**

If you have questions about this Email Privacy Policy, contact us at Empire Merchants, LLC  
Attention: Compliance Department  
16 Bridgewater Street  
Brooklyn, NY 11222  
**Last updated: May 2011**