Privacy Policy: The Flower City Bourbon Investment Club

Effective Date: November 24, 2025

This Privacy Policy describes how the **Flower City Bourbon Investment Club** (the "Group" or "Club"), administered in Rochester, New York, collects, uses, protects, and discloses personal identifying information (PII) related to its Shareholders and website users.

1. Information We Collect

We only collect information necessary to administer the Group, comply with legal/tax requirements, and manage the Assets.

A. Personal Identifying Information (PII)

This information is primarily collected through the Enrollment Form and includes:

- **Contact Information:** Full Shareholder Name or Entity Name, Physical Mailing Address, Email Address, and Phone Number.
- **Financial Details:** The number of Shares purchased and the associated investment amount.
- **Administrative Data:** Records of votes cast in Group Decisions and official written correspondence regarding Share transfer/sale.

B. Non-Personal Information

When you access our website (if applicable), we may automatically collect non-personal data, such as IP addresses, browser type, and access times, to maintain website functionality and security.

2. How We Use Your Information

Your PII is used strictly for the operation and administration of the Group:

1. **Group Administration:** To maintain the official, current master list of all Shareholders and their respective Share quantities, as mandated by the Group Agreement.

2. **Communication:** To provide official notices, meeting minutes, updates on Asset status (aging, storage), and information regarding Group Decisions.
3. **Exit Strategy and Distribution:** To calculate and execute the correct proportionate distribution of sale proceeds from the Assets.
4. **Legal and Tax Compliance:** To comply with federal, state, and local laws, and to assist third-party professionals (e.g., accountants, legal counsel) in fulfilling necessary compliance obligations.
5. **Security:** To verify the identity of Shareholders during voting or when processing a Change of Ownership.

3. How We Protect Your Information

The Group's Administrator and any authorized third-party professionals are committed to protecting your PII. We maintain reasonable administrative, technical, and physical safeguards designed to protect the information we collect against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

- **Data Storage:** PII is primarily stored in secure, password-protected electronic records maintained by the Group Administrator.
- **Limited Access:** Access to PII is restricted to the Group Administrator and essential third-party professionals who require the information to perform their duties (e.g., tax preparation).

4. Disclosure and Sharing of Information

We do not sell, rent, or trade your PII to third parties for marketing purposes. Your information is shared only under the following limited and necessary circumstances:

- **Licensed Professionals:** We may share PII with licensed third parties, including but not limited to:
    - **Bourbon Brokers and Custodians:** To legally facilitate the purchase, storage, and eventual sale/transfer of the Assets.
    - **Accounting and Legal Counsel:** To fulfill tax reporting requirements and ensure compliance with the Group Agreement and applicable New York State and federal laws.
- **Legal Requirements:** If required to do so by law or subpoena, or if we reasonably believe that such action is necessary to comply with the law and the reasonable requests of law enforcement.

5. Shareholder Rights and Responsibilities

- **Access and Correction:** Shareholders may request access to the PII we hold about them and ask that it be corrected or updated by contacting the Group Administrator in writing.
- **Shareholder Tax Responsibility:** As stated in the Group's Financial Disclosure, each Shareholder is responsible for their own tax obligations, including capital gains and losses. The Group will not disclose PII related to tax strategy to other Shareholders.

6. Compliance with New York State Law

The Group is committed to adhering to all applicable New York State laws regarding data privacy and security, including principles related to the protection of private information.

7. Changes to this Policy

We may update this Privacy Policy from time to time. We will notify Shareholders of any material changes by posting the new policy on our website and updating the "Effective Date."

8. Contact Information

If you have any questions about this Privacy Policy or the PII we hold about you, please contact the Group Administrator at:

Michael Trippany

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585-802-6923