

# Geolocation Controls Policy

Last Updated January 14, 2026

**Aligned to:** Atlantis Privacy Policy

**Also aligned to:** Atlantis Terms & Conditions (Section 12 on Age-Restricted Products)

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## 1. Purpose

Atlantis Fresh Market (“Atlantis,” “we,” “us,” or “our”) uses geolocation controls to comply with:

- **Federal Tobacco Laws (PACT Act)**
- **State and local restrictions on tobacco delivery**
- **Atlantis Terms & Conditions**, particularly delivery restrictions in Section 12.2
- **Atlantis Privacy Policy**, which governs our collection and use of geolocation information
- **Apple App Store & Google Play location-use disclosure requirements**

This policy governs how user location data is collected, verified, and used to determine eligibility to order or receive **tobacco and other age-restricted products** through the Atlantis Rewards App and Atlantis Delivery Website.

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## 2. Relationship to Atlantis Privacy Policy

The public-facing Privacy Policy states that Atlantis collects:

- **Approximate location** (derived from IP address)
- **Precise location** (when device permissions allow)
- **Store visit location data & transaction location**
- **Device identifiers, OS details, unique device IDs**

- **Technical attributes for fraud prevention & integrity**

✦ **This Geolocation Controls Policy formally implements those disclosures by defining how that data is used to enforce tobacco-delivery compliance.**

(Privacy Policy ref: Section “Geolocation Information” and “Information Collected Automatically Through the Services.”)

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## 3. Scope of Geolocation Controls

These controls apply to:

- The **Atlantis Rewards mobile app**
  - The **Atlantis Delivery website**
  - All **tobacco, nicotine, vape/ENDS, and age-restricted products**
  - All **delivery orders** facilitated through our first-party delivery system
  - All **device types** (iOS/Android/web)
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## 4. Geolocation Information We Collect

Consistent with our Privacy Policy, we use:

### 4.1 Device-Based Precise Location (with permission)

Used to:

- Determine whether a customer is physically located in a jurisdiction permitting tobacco delivery.
- Prevent orders from unsupported locations.
- Prevent cross-state ordering and delivery.

### 4.2 Approximate Location (IP-based)

Used when:

- A customer denies GPS permission.
- We need to cross-reference network-level location for fraud prevention.

## 4.3 Delivery Address Validation

Every order undergoes:

- Address normalization
- Geocoding
- State, county, and municipality validation against our restricted-location database

## 4.4 Device Insights

(As disclosed in the Privacy Policy)

Collected to ensure:

- Security
- Fraud detection
- Prevention of ID spoofing or unauthorized ordering

This includes device type, OS version, device identifiers, and app integrity data.

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# 5. Location-Based Order Controls

Atlantis uses location data to allow or deny tobacco ordering **in real time**.

## 5.1 Display Controls

The app automatically:

- Hides tobacco categories in banned jurisdictions
- Prevents adding age-restricted items to the cart if location is not permissible
- Shows compliance messaging when ordering is blocked

(Aligned with ToS §12.2.1: Prohibited Jurisdictions)

## 5.2 Checkout Controls

At checkout:

- GPS + IP + delivery address must align
- Customer must be located at a legal delivery address

- App blocks checkout when signals conflict

## 5.3 Delivery Controls

Before dispatching a driver, the system confirms:

- The destination address is legal
- The store and customer are located in authorized states (MA & NJ only)
- No cross-border delivery will occur

(ToS §12.2.2: No crossing state lines)

If any step fails → order is automatically canceled.

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## 6. Spoofing, Tampering, and Fraud Detection

In accordance with the Privacy Policy's purpose for collecting technical information for security and fraud prevention, the system flags:

- VPN or proxy use
- Location spoofing apps
- Conflicting GPS/IP/address signals
- Disabled or inconsistent device location services

When detected:

- Tobacco ordering is blocked
  - Account may be flagged for review
  - Orders may be automatically canceled
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## 7. User Consent & Transparency

Consistent with the Privacy Policy:

- The app requests device location permission ("Allow While Using the App").
- Users may disable location services, but doing so **disables tobacco ordering**.

- Atlantis discloses its use of geolocation in the Privacy Policy and in App Store/Play Store permission prompts.

Atlantis **does not sell** geolocation information.

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## 8. Data Use & Retention

### 8.1 Uses of Location Data

- Enforcing tobacco delivery restrictions
- Preventing sales to prohibited jurisdictions
- Preventing tax evasion, trafficking, or unlawful delivery
- Validating identity during age-restricted transactions
- Fraud detection & security integrity

### 8.2 Retention

Location validation logs are retained consistent with:

- Privacy Policy retention terms
  - PACT Act recordkeeping requirements (4 years minimum for age-restricted products)
  - Fraud/security investigation needs
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## 9. How This Aligns With Atlantis Terms of Service

This policy supports and enforces:

- ✓ **ToS §12.1** — Age & identity verification
- ✓ **ToS §12.2.1** — Prohibited jurisdictions (e.g., New York State & NYC)
- ✓ **ToS §12.2.2** — No cross-state tobacco delivery
- ✓ **ToS §12.3** — Shipping and handling compliance
- ✓ **ToS §12.4** — Licensing, tax-stamp, and PACT Act compliance
- ✓ **ToS §12.7** — Fraud prevention & recordkeeping

No terms conflict with geolocation controls.

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## 10. Governance & Updates

- This policy is reviewed annually or when applicable laws change.
- Updates will be posted to the Privacy Policy or ToS as required.
- Changes will follow the Privacy Policy's "Last Updated" and notice provisions.