

Privacy Policy

LocalMeal Ltd., a company duly incorporated and existing under the laws of England, with its registered office at Flat 12, 47 Cleveland St, Emerson Bainbridge House, London United Kingdom, W1T 4JQ including its affiliates and subsidiaries (the "**LOCALMEAL**", "**we/us**") is committed to protecting and respecting your privacy. This privacy policy ("**Privacy Policy**") explains how we collect, use, share and protect data that identifies or is associated with you ("**Personal Data**") in relation to our Website and/or App <https://www.localmealapp.com/> including the Service (as defined in "**Terms and Conditions of Use**") offered on our App (the "**Platform**"), and your choices about the collection and use of your information.

LOCALMEAL is an app ("**Platform**") that addresses the unmet need for a more trustworthy, and user-friendly experience for discovering small, local, delicious restaurants. The company was founded to bring the most meaningful dining experiences to passionate foodies and support local restaurants along the way. Our Privacy Policy applies to all visitors, users, and others who access the Platform ("**Users**").

Before accessing or using the Platform, please ensure that you have read and understood our Privacy Policy. We may change this Privacy Policy at any time by notifying you of the change by email or by posting a notice on the Website. Unless stated otherwise, any change takes effect from the date set out in the notice. You are responsible for ensuring you are familiar with the latest version. **This Privacy Policy was last updated on May 2nd, 2022.**

I. INFORMATION WE COLLECT

1.1. Information We Collect When You Use Our Platform

- i. **Log file information:** We collect information that your browser sends whenever you visit our Platform. This log file information may include information such as your computer's Internet Protocol address, browser type, browser version, the pages of our Platform that you visit, the time and date of your visit, the time spent on those pages, and other statistics.
- ii. **Analytics services (non-personally identifiable information only):** We use third-party analytics tools to help us measure traffic and usage trends for the Platform. These tools collect information sent by your device or our Platform, including the web pages you visit, add-ons, and other information that assists us in improving the Platform. The tools use 'cookies', which are text files placed on your device, to collect your log information and behavior information in an anonymous form. We collect and use this analytics information with analytics information from other Users so that it cannot reasonably be used to identify any particular individual User. With respect to Google Analytics: although Google Analytics plants a permanent cookie on your web browser to identify you, the cookie can only be used by Google. Google's ability to use and share information collected by Google Analytics about your visits is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits by disabling cookies.
- iii. **DoubleClick Cookie:** Google, as a third-party vendor, uses cookies to serve ads on our Platform. Google's use of the DoubleClick cookie enables it and its partners to

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serve ads to our users based on their visit to our Platform or other websites on the Internet. You may opt out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page.

- iv. **Remarketing:** We use remarketing services to advertise on third-party websites to you after you visited our Platform. We, and our third-party vendors, use cookies to inform, optimize, and serve ads based on your past visits to our Platform.
- v. **Google:** Google Ads remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting [Google Ads Settings](#). Google also recommends installing the [Google Analytics Opt-out Browser Add-on](#) for your web browser. This service provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the [Google Privacy & Terms web page](#).

1.2. The Information You Provide

Please find below the type of information we may require from you in order to provide our services on the Platform:

PERSONAL DATA TYPE	USERS
full name	+
gender	+
address, postal code, city, state	+
e-mail address	+
date of birth	+
your username and password when you register for an account	+
IP address	+
communications between you and other users	+
subscriptions/preferences	+

II. USE OF PERSONAL DATA

2.1. We use your personal data to help us provide and support the Services on our Platform. Here is how:

- a) **Service provision:** we use the information to carry out and administer the tests you book, take or develop;
- b) **Communication:** sending emails, newsletters, and other messages to keep you informed of the Platform. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link. We also use the personal data to deal with inquiries and complaints made by you relating to the Platform and to address your questions, issues, and concerns;
- c) **Website/App monitoring:** to check the Platform and our other technology services are being used appropriately and to optimize their functionality;

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- d) **Platform optimization:** improve, test, and monitor the effectiveness of our Platform and diagnose or fix technology problems;
- e) **Managing suppliers:** who deliver services to us;
- f) **Easy access:** to help you efficiently access your information after you sign in and to remember information so you will not have to re-enter it during your visit or the next time you visit the Platform;
- g) **Statistics:** monitor metrics such as total number of visitors, traffic, demographic patterns, and patterns in our test results (on an anonymized and aggregated basis);
- h) **Development:** develop and test new products and features.

III. REASONS FOR USING YOUR PERSONAL DATA

3.1. We will process your personal data for a number of reasons:

- a) You have given us an explicit consent;
- b) It's necessary for us to process your personal data regarding the performance of a contract.
- c) Processing is necessary for our legitimate business interests or those of a third party: provided this does not override any interests or rights that you have as an individual. Our legitimate interests are:
 - managing our business and relationship with you or your company or organization;
 - understanding and responding to inquiries and User feedback;
 - understanding how our Users use the Platform;
 - identifying what our Users want and developing our relationship with you, your company or organization;
 - improving our Platform and offerings;
 - developing relationships with business partners;
 - sharing data in connection with acquisitions and transfers of our business.

IV. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

4.1. We share your information with others as follows:

- **Suppliers:** who support our business including IT and communication suppliers, outsourced business support, business intelligence, marketing, and advertising agencies, and back-up vendors. Our suppliers have to meet standards regarding information security and they will only be provided data in line with their function.
- **Change of control:** If we sell or otherwise transfer part or the whole of **LOCAL MEAL** or our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your information and any other information collected through the Platform may be among the items sold or transferred. The buyer or transferee will have to honor the commitments we have made in this Privacy Policy.
- **Legal requests and preventing harm:** We may access, preserve and share your personal data in response to a legal request (like a search warrant, court order etc.) if we have a good faith belief that the law requires us to do so. We may also access, preserve and share information when we have a good faith belief it is necessary to (i)

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detect, prevent and address fraud and other illegal activity and (ii) to protect ourselves, you, and others, including as part of investigations. Information we receive about you may be accessed, processed, and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

V. SAFETY AND SECURITY

5.1. LOCALMEAL has taken appropriate technical and organizational measures by using the latest technologies to protect your personal data against loss or unlawful processing. We use safeguards to help keep the information collected through the Platform secure and take steps (such as requesting a unique password) to verify your identity before granting you access to your account. However, we cannot ensure the security of any information you transmit to us or guarantee that information on the Platform may not be accessed, disclosed, altered, or destroyed. We request you to do your part to help us. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and us, at all times. We are not responsible for the functionality, privacy, or security measures of any other organization.

VI. YOUR RIGHTS

6.1. If you are resident in the European Union, in accordance with General Data Protection Regulation, you have the following rights in respect of your personal information that we hold:

- **Access:** you are entitled to ask us if we are processing your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it;
- **Correction:** you are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected;
- **Erasure:** you are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims;
- **Restriction:** you are entitled to ask us to suspend the processing of certain of your personal data about you, for example, if you want us to establish its accuracy or the reason for processing it;
- **Portability:** you have the right, in certain circumstances, to receive a copy of the personal information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person;
- **Objection:** where we are processing your personal data based on a legitimate interest (or those of a third party), you may challenge this. However, we may be entitled to continue processing your information. You also have the right to object where we are processing your personal information for direct marketing purposes;

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- **Automated decisions:** you may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered;
- **Consent:** where we are processing personal data with consent, you can withdraw your consent.

Residents in other jurisdictions may have similar rights to the above. If you want to exercise any of these rights, please contact customerservice@localmealapp.com.

You also have a right to lodge a complaint with a data protection supervisory authority, in particular in a member state in the European Union where you are habitually resident or where an alleged infringement of Data Protection law has taken place.

VII. THIRD-PARTY APPLICATIONS, WEBSITES, AND SERVICES

- 7.1.** We are not responsible for the practices employed by any applications, websites, or services linked to or from our Platform, including the information or content contained within them. Please remember that when you use a link to go from our Platform to another application, website, or service, the Privacy Policy does not apply to those third-party applications, websites, or services.
- 7.2.** Your browsing and interaction on any third-party application, website, or service, including those that have a link on our Platforms, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible and do not have control over any third parties that you authorize to access your account.
- 7.3.** If you are using a third-party app, website, or service and you allow them to access your account you do so at your own risk.

VIII. HOW LONG DO WE KEEP YOUR DATA?

- 8.1.** We generally keep your information only as long as needed to provide the services on our Platform. We will retain your information as necessary to comply with legal, accounting, or regulatory requirements.

IX. WHERE WILL YOUR INFORMATION BE HELD?

- 9.1.** Your information will be held on servers in European Economic Area. We will take steps to protect your information in line with locally applicable data protection requirements. Your information may be transferred to, and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. If you are located outside the European Economic Area and choose to provide information to us, please note that we transfer the information to the European Economic Area. Your consent to this Privacy Policy followed by your submission of personal data represents your agreement to that transfer.

X. COOKIES

- 10.1.** Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. See below for details on what information is collected by cookies and how we use that information.

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10.2. LOCALMEAL uses cookies to gain a better understanding of how visitors use this website. Cookies help us tailor **LOCALMEAL** Website to your personal needs, to improve their user-friendliness, gain customer satisfaction feedback on our websites (through designated partners) and to communicate to you elsewhere on the web. To enable this, some cookies are applied when you enter our site.

10.3. LOCALMEAL keeps all the information collected from cookies in a format that is not personally identifiable. **LOCALMEAL** cookies located on your computer do not retain your name or your IP address.

10.4. The following types of cookies are used on **LOCALMEAL** Platform.

a) Necessary Cookies

These are cookies that are strictly necessary for the operation of a website. Without these cookies, this website won't work properly. Accordingly, we are not asking you for your specific consent for those cookies. For all other cookies, your informed consent is required.

b) Session Cookies

Session cookies are temporary cookie files which are erased when you close your browser. When you restart your browser and go back to the site that created that cookie, the website will treat you as a new visitor.

c) Functional Cookies

These are cookies that are set up to improve the functionality of the website. For example, cookies that remember the content you previously viewed on this website or the email address and password you provided when registering during an earlier visit to this website. Using Functional cookies may allow us to serve you content tailored to your interests and save you the time of having to re-register or re-enter information when you re-visit this website or try to access certain subscription-only sections. We may also use Cookies to lockout underage users from certain activities.

NAME	PROVIDER	PURPOSE	EXPIRY	TYPE
_ga	Google	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.	2 years	HTTP
_gat	Google	Used by Google Analytics to throttle request rate	1 day	HTTP
_ga_2T5J5Q0E6D	Google	These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website.	30 days	HTTP
1P_JAR	Google	These cookies are used to collect website statistics and track conversion rates.	30 days	HTTP

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_hsrc	Hubspot	This cookie is set to determine if the visitor has restarted their browser.	End of session	HTTP
_hstc	Hubspot	The main hubspot cookie for tracking visitors.	13 months	HTTP
_hssc	Hubspot	This cookie keeps track of sessions.	30 minutes	HTTP
hubspot utk	Hubspot	This cookie keeps track of a visitor's identity. It is passed to HubSpot on form submission and used when deduplicating contacts.	13 months	HTTP
messag esUtk	Hubspot	This cookie is used to recognize visitors who chat with you via the chatflows tool.	13 months	HTTP