

## **Privacy Policy**

Last updated: May 10, 2019

PaidMeals, Inc. (“we”, “our” or “us”) is concerned about your privacy, and we want to familiarize you with how we collect, use, and disclose your information. This Privacy Policy describes our practices in connection with information which we collect through our website, mobile application (“App”), our social media pages, and electronic communications (collectively, the “Platform”). If you have any questions or comments about the Privacy Policy or our privacy practices, please contact us at PaidMeals@gmail.com. Terms not defined in this Privacy Policy are defined in our Terms and Conditions, available at: [www.PaidMeals.com/terms-and-conditions](http://www.PaidMeals.com/terms-and-conditions).

**BY USING THE PLATFORM, YOU AGREE WITH ALL TERMS OF THIS PRIVACY POLICY. PLEASE DO NOT USE THE PLATFORM IF YOU DISAGREE WITH ANY PART OF THIS PRIVACY POLICY.**

We may make changes to this Privacy Policy from time to time; we may notify you of such changes by any reasonable means, including by posting the revised version of this Policy in the Platform. It is your responsibility to review the most recent version of the Agreement frequently and remain informed about any changes to it. You can determine when we last changed this Agreement by referring to the “Last updated” legend above. Your use of the Platform following changes to this Policy will constitute your acceptance of those changes.

### **WHAT INFORMATION WE MAY COLLECT FROM YOU**

**Personal Information.** In order to use our services and open an account on the Platform, you must provide us with certain Personal Information.

When you register with the Platform and open a user account (“**User Account**”), we collect information about you and your use of the Platform, which may include the following:

- your first and last name;
- your telephone number;
- your e-mail address.

A third-party provider of verification services may collect **information for purposes of verification of your account** which may include the following:

- Employer Identification Number;
- business licensing information;
- IRS-issued tax-exempt status letter.

Your credit/debit card and billing information is collected, processed, and stored by a third party that handles payments for us. To keep your credit/debit card information safe and secure, we do not store credit/debit card and billing information on our servers.

When you use the Platform, **we, as well as third-party analytics services providers, may automatically track certain basic information about our users and their in-Platform actions.** We use this information to do internal research on our members' usage patterns, interests, preferences and general behavior, to better understand and serve you and our community. We collect information about you and your use of the Platform, which may include the following:

- through your browser or device: certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type, screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type; we use this information to ensure that the Platform functions properly;
- GPS location information;
- cookies;
- pixel tags and other similar technologies: pixel tags may be used in connection with the Platform to, among other things, track the actions of users of the Platform, measure the success of our marketing campaigns, and compile statistics about usage of the Platform and response rates;
- IP address may be identified and logged automatically in our server log files whenever a user accesses the Platform, along with the time of the visit and the page(s) that were visited; collecting IP addresses is standard practice and is done automatically by many websites and applications; we use IP addresses for purposes such as calculating usage levels of the Platform, helping diagnose server problems, and administering the Platform;

**Note regarding “cookies”:** Cookies are unique identifiers that we transfer to your device to enable our systems to recognize your device and to provide features such as advertisements, remembering your preferences, and storing items in your shopping cart. We use cookies in many ways. Cookies help us to improve the offered services and make use of our services more convenient. We collect data on how users interact with our website and/or application. You can prevent your web browser from accepting new cookies or disabling cookies altogether. However, because cookies allow you to take advantage of some of PaidMeals’s essential features, we recommend that you leave them turned on. Using or deactivating cookies is your choice.

Information you voluntarily provide as content of your Platform user profile and in electronic communications:

- images and other information from your device's camera and photos (with your consent);
- message(s) you send to us;
- information we receive from other members or third parties about your activities or posting(s) on the Platform;
- additional information shared by you.

## **WAYS IN WHICH WE MAY USE YOUR INFORMATION**

PaidMeals and our third-party affiliates may use your information:

- to process your request to register as a user of the Platform;
- to process and complete your services requests;
- to respond to your inquiries;
- to keep a record of your contact information and correspondence, and use it to respond to you if you contact us through the Platform;
- to send marketing e-mails such as newsletters or informational updates about PaidMeals;
- to send administrative information; for example, information regarding the Platform and changes to our terms and conditions and policies;
- for our business analytics purposes, such as data analysis, audits, fraud monitoring and prevention, enhancing, improving or modifying our Platform, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities;
- as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce Platform's Terms and Conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain;
- to create a better, more personalized experience for you based on your individual usage habits, improve our marketing and promotional efforts, analyze Platform usage, and customize our Platform's content and layout in order to better meet your needs;
- to send you text messages and push notifications;
- to facilitate transactions and payments.

We and our third-party affiliates may use aggregate Personal Information in a manner which does not uniquely identify you or any other user of the Platform.

## **WAYS IN WHICH WE MAY DISCLOSE YOUR INFORMATION**

We may disclose information we collect about you:

- to other users of the Platform to fulfill your requests, for example to Vendors in order to complete your order;
- to a third-party verification services provider as necessary to complete your user registration process;
- to a third-party payment services provider to facilitate your transaction and payment;
- to our third-party service providers that provide services such as App hosting, Platform-related consulting and monitoring, data analysis, information technology and related infrastructure, customer service, email delivery, auditing and other similar services;
- to identify you to anyone to whom you send messages through the Platform;
- to a third party (whether affiliated or unaffiliated with us) in the event of any reorganization, merger, sale, joint venture, assignment, conveyance, transfer or other disposition of all or any portion of our business, assets or interests (including in connection with any bankruptcy or similar proceedings);
- as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce the Terms and Conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; (g) to allow us to pursue available remedies or limit the damages that we may sustain; and (h) respond to claims that any posting or other content of our Platform violates the rights of third parties, including without limitation providing information necessary to satisfy the notice and counter-notice procedures pursuant to the Digital Millennium Copyright Act.

## **PERSONAL INFORMATION OF OTHERS**

We may receive Personal Information from you about others: you as a Contributor may provide name and/or picture of a person in need whom you would like to fund a meal (a “Beneficiary”). If you provide us with Personal Information of a Beneficiary, you warrant and represent that the Beneficiary expressly authorized you to disclose that information to us and authorized us to collect, use, and disclose such information for the purposes described in this Privacy Policy. This means that **you must take reasonable steps to ensure the Beneficiary is aware of and consents to the various matters detailed in this Privacy Policy, including the fact that their Personal Information is being collected, the purposes for which that information is being collected, the intended recipients of that information, the individual's right to obtain access to that information, our identity, and how to contact us.** We intend not to store Beneficiary’s Personal Information longer than it is needed for a Vendor to complete Contributor’s order and deliver it to the Beneficiary.

## **LINKS TO THIRD-PARTY WEBSITES**

Our sites may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party sites or applications, and are not responsible for their privacy statements, policies or terms. When you leave our Platform, we encourage you to read the privacy notices, policies and terms of every other site which you visit.

## **LOCATION INFORMATION**

We may use information about your location obtained through your mobile device in order to facilitate providing services to you. While you can prevent your device from sharing location information at any time through your device’s operating system settings, without sharing your location we may not be able to provide our services to you.

## **PAYMENT INFORMATION**

All payments are facilitated through a third-party payment processor. Your information is subject to third party payment processing’s Terms and Conditions and privacy policy. Please see third party payment processing’s policies for how your data may be used or stored.

## **SECURITY**

We endeavor to use reasonable organizational, technical and administrative (organizational) measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with this Privacy Policy. It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when finished using a shared computer.

## **USE OF YOUR PERSONAL INFORMATION FOR MARKETING PURPOSES**

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out from receiving these marketing-related emails by contacting us by e-mail at [PaidMeals@gmail.com](mailto:PaidMeals@gmail.com). We will try to comply with your request(s) as soon as reasonably possible. Please note that if you do opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, and you cannot opt-out from receiving administrative messages.

## **HOW YOU CAN CHANGE OR SUPPRESS YOUR PERSONAL INFORMATION**

You may request to correct, update, suppress, or otherwise modify any of your Personal Information that you have previously provided to us through the Platform, or object to the use or processing of such Personal Information by us. In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information that you have provided to us suppressed from our database, or otherwise let us know what limitations you want to place upon your Personal Information which you have provided to us. For your protection, we may only implement requests with respect to the Personal Information associated with the particular e-mail address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably possible.

## **RETENTION PERIOD**

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. We will retain in our files information you may have requested us to remove if, in our discretion, retention of the information is necessary to resolve disputes, troubleshoot problems or to enforce the Terms and Conditions.

## **USE OF ELECTRONIC COMMUNICATION BY MINORS**

The Platform is not directed to individuals under the age of thirteen (13), and we request that these individuals not provide Personal Information through the Platform. We do not knowingly collect personal information from children under the age of thirteen. If you believe that we might have any information from a child under 13, please contact us at PaidMeals@gmail.com so that we may delete it as soon as possible. If you are under eighteen, you may use PaidMeals only with the permission and oversight of a parent or guardian.

## **CROSS-BORDER TRANSFER**

The Platform is controlled and operated by us from the United States and is not intended to subject us to the laws or jurisdiction of any state, country, or territory other than that of the United States. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Platform you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those of your country.

## **EUROPEAN UNION GENERAL DATA PROTECTION REGULATION**

At PaidMeals, we comply with the European Union General Data Protection Regulation ("GDPR"). We recognize the sensitive nature of the personal data we collect and the importance of protecting it. The GDPR requires us to obtain consent from European Union ("EU") residents before using their data in any way. It also entitles them to access their data and ask for it to be removed and forgotten from any databases on request. Below is a list of privileges and how you can exercise these privileges and rights included with GDPR.

- You have a right to consent to how PaidMeals uses your data and the data points described in this Privacy Policy ("WHAT INFORMATION WE MAY COLLECT FROM YOU").
- Your data may be used for marketing e-mails and marketing promotions such as newsletters, informational updates about PaidMeals.
- Your data is stored for an indefinite matter of time if you do not notify PaidMeals via the below methods to remove it. In the case that PaidMeals tries to contact you and your e-mail address and/or phone number are no longer viable, your information will be declared inactive and PaidMeals will not continue to attempt contact. If your contact information is updated with viable information, our records will be declared active as long as you haven't exercised your right to revoke consent or be forgotten.
- Under GDPR you have the right to ask for all the data collected on you. Your data is stored in a secure database. It will take up to 72 hours to retrieve and send you collected data. The data will be provided in the form on a spreadsheet and sent via personal email.
- Your right to be forgotten refers to your right to have your information wiped from our database. If you wish for your information to be removed please email us at PaidMeals@gmail.com and we will confirm your information is removed via personal e-mail within 72 hours.
- If you wish to submit a formal complaint against how your data is being used, collected, or stored by PaidMeals, contact us at PaidMeals@gmail.com.
- If you have consented to receive messages from us and need to revoke that consent, please contact us at PaidMeals@gmail.com and we will update our records and ensure your data is not stored. We will confirm your withdrawal via personal email within 72 hours.

## **UPDATES TO THIS PRIVACY POLICY**

We may change this Privacy Policy. Please take a look at the "Last Updated" legend at the top of this Privacy Policy to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we post the revised Privacy Policy in the App or elsewhere on our Platform. Your use of the Platform after those changes means that you accept the revised Privacy Policy.

## **DISPUTE RESOLUTION**

Any dispute, claim or controversy arising out of or relating to this Privacy Policy or previous Privacy Policy statements shall be resolved through negotiation, mediation, and arbitration as provided in our Terms and Conditions.

## **ENTIRE AGREEMENT**

This Privacy Policy hereby incorporates by reference any additional terms that we post on the Platform (including, without limitation, our Terms and Conditions) and, except as otherwise expressly stated herein, this Privacy Policy is the entire agreement between you and us relating to the subject matter herein and supersedes any and all prior or contemporaneous written or oral agreements or understandings between you and us relating to such subject matter.

## **CONTACTING US**

If you have any questions about this Privacy Policy, please contact us via e-mail at [PaidMeals@gmail.com](mailto:PaidMeals@gmail.com). Please do not send us, and do not disclose, any sensitive Personal Information (e.g., Social Security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background, or trade union membership) on or through the Platform or otherwise to us.

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