

Carte

Privacy Policy

Effective Date: February 4, 2025

Introduction

Eate Digital Solutions, Inc. ("Eate Digital," "Eate," "Carte," "Store," "Company", "we", "us", "our") respects your privacy and is committed to protecting it through our compliance with this Privacy Policy ("the Policy"). This Policy describes the personal data Eate Digital receives and/or processes (which may include the collecting, organizing, structuring, storing, using, or disclosing) when you interact with Eate Digital's Retail Consumer Services, Store and Carte ("Carte", "Store," "myCarte"):

1. The types of information we may collect from individuals ("Consumers", "Purchasers") and merchants ("Carte Merchants", "Merchants"), (collectively "Users", "you"), who interact with Eate Digital and/or Carte, or use our websites EateDigital.com, Eate.io, Hoste.io, and/or myCarte.io (collectively, the "Website") or that you may provide when you download, install, register with, access, or use any Eate Digital applications, including the Carte and Store Apps (collectively, the "App") or via telephone (collectively, the "Services").
2. Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect:

- On our Website;
- In email, text, and other electronic messages between you and us;
- Through the App and other electronic communications sent through or in connection with the App;
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Policy.

This Policy does NOT apply to information you provide to or is collected by any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website or the App. We encourage you to read the

privacy policies associated with any third party to understand their privacy practices before interacting with them.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. By accessing or using the Website and/or the App, you agree to this Policy. This Policy may change from time to time (see "Changes to Our Privacy Policy"). Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

Information We Collect About You and How we Collect It

We collect several types of information from and about Users, including:

1. **Personal Information.** This includes information that we use to identify you, such as your name, address, email address, telephone number, profile picture, or other information you choose to provide us when you sign up for or interact with Carte, and may be used to link this information to different devices or account you use when you interact with Eate Digital and/or Carte.
2. **Non-Personal Information.** This includes User behavior on our Services and aggregated generic information. This is information that is about you but individually does not identify you.
3. **Usage information.** This includes information about your device including IP address, browser type and version, time zone setting, device identifiers, network connection, page interaction information collected through cookies and other tracking technologies.
4. **Settings and Privacy Preferences.** We receive information about your settings and preferences on Carte and our Merchants, including your browser and device privacy settings.
5. **Other Information You Provide to Us.** This includes information that you provide in your communications with Eate Digital including interactions with support, team members, and exchanges with Eate Digital through social media channels.

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("Personal Information").

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:

- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We collect different types of information from Users, and we use and/or disclose this information for different business purposes.

We collect this information:

1. Directly from you when you provide it to us.

You may provide your personal information to us when you use our Services, including when you register with Carte, use, search within or place orders through our Services, contact us with inquiries, engage with our Help Center or other similar technology on the platforms or Services, respond to surveys, or otherwise access or use our Services. This information may include:

- Personal Identifiers and records information – We may collect and process information such as name, alias, email address, postal or delivery address, billing address, account name, phone number, signature, date of birth, vaccination status, or other similar identifiers.
- Biometric Information – We may process facial recognition, voiceprint, or other similar data that may be considered biometric data.
- Transactional/Commercial Information – When you place an order through our Services, we collect information related to that order. This may include information such as items purchased, customizations, special instructions, date and time of order, subtotal, promotion, taxes and fees, tip amount, the selling Merchant, or other purchasing or consuming histories or tendencies.
- Financial Account or Payment Information – Payment information collected such as bank name, payment method, or other financial information. We use a third-party payment processor that collects your payment information and processes payments made on or through the Services. We obtain limited information about your payment card from our payment processor, such as the last four digits of your card and the expiration date.
- Survey Response Data – We conduct survey research among participating Users to learn more about Users to improve and enhance our Services and in connection with surveys, we may collect various information including, without limitation, information pertaining to Consumer activity, usage of the Services, health and medical information, race/ethnicity information, sex life/sexual orientation, family relationships, etc.

- Identification Documentation – We may collect identification documentation (e.g., drivers' license, Federal or state identification card, passport, etc.) in certain limited scenarios (e.g., to verify identity and age when facilitating a purchase of an age-restricted product, good, and/or other item).
- Access Credential Information – In connection with your User account, we will process username, password, unique User identification number, etc.
- Loyalty Account Information – In connection with your use of our Services, we may process loyalty account information for your participation in certain loyalty programs.
- Sensory information - images, photos, and/or videos that you upload or submit to us in connection with the Services (e.g., a profile photo, a photo associated with your review, etc.).
- Employment and professional information - if you are using our Services on behalf of your employer as a Merchant on our platform, we may collect employment or professional related information from or about you.

Sensitive Data or Sensitive Personal Information – as these terms are defined under applicable data protection and privacy laws, including precise geolocation (see below for further information); a social security, driver's license, state identification card, or passport number; racial or ethnic origin; religious beliefs; mental or physical health diagnosis; sex life or sexual orientation; or citizenship; etc. We do not use or disclose your sensitive data or sensitive personal information for purposes other than to perform the Services reasonably expected by an average Consumer, for security and legal reasons, with your consent, and/or for other purposes permitted by applicable law.

2. Information received from you as part of your communications

When you use our Services, complete electronic forms, communicate with Merchants or contact us, by online chat, email, phone, text, or other communication apps, we may automatically collect and store certain information about you and the activity you engaged in, for example: your name and contact information; your order details; information that you voluntarily provide to us; the nature and content of your communication; the purpose of the interaction; and the action we took in response to your inquiry or request.

3. Automatically as you navigate through the Website and App.

We also may collect and store certain information about you and your device(s) automatically when you access or use our platforms and Services, including, without limitation, on our Website and engaging with our App. This collection may include the use of, among other technology, cookies and similar technologies as described in the Cookies and Similar Technologies Section of this Policy. This information may include:

- **Technical Information** – We collect technical information associated with your activity on our platforms and/or Services and may include information related to your browser and operating system, IP address (the Internet address of your computer), unique device identifiers, personal and online identifiers, and other information such as your device type and version of the App that is in use.
- **Usage Information** – This may include the webpage that you were visiting before accessing our platforms and Services, the pages or features of our platforms and Services that you browsed to inform us which part of our platform and Services you visit and how much time you spend there.
- **Platform Preferences** – We collect information about your preferences to make your use of the platforms and Services more productive.

4. Location information

When you use the Services, we may collect and store general location information (such as IP address). We may also collect distance information and order shipping information. If you permit the Services to access location services through the permission system used by your mobile operating system or browser, we may also collect and store the precise location of your device when our App is running in the foreground or background of your device. This information may be used to help you select a Merchant, to provide more accurate shipping times for your orders, to provide recommendations on Merchants to you based upon your location, and to enhance your user experience and improve the Services. You can choose whether to enable the location tracking feature through the settings on your device or when prompted by our App. If you choose to disable the location feature this may impact some of your use of our Services (e.g., you may not be able to find nearby Merchants).

5. Information related to the referral or sharing of Services

Eate Digital allows Users to (i) share Merchant information from or through our Services and (ii) invite people with whom the User has a personal connection to sign up for our Services. If you are sharing Merchant information or referring a new User, we will process information related to you and the recipient. This information will include, but is not limited to, names of both the sender and the recipient, contact information for the recipient, information related to the Merchant and shared information (e.g., the Merchant that was sent, any specific items sent, what activity has the recipient taken towards completing the activities associated with the referral, the content of any messages included, etc.). For any personal information that you provide about a recipient, by submitting the information to us you certify that you have the consent and approval of the recipient for you and Eate Digital to process their personal information for the purposes for which you disclosed it to us (and, as applicable, for the sending of messages (e.g., email, etc.) to the recipient).

6. Information collected about Users from market enrichment partners

We may license, rent, or otherwise acquire certain demographic information that is about or associated with you that we use to gain a better understanding of you and your consumer habits so that we can improve and enhance our Services and marketing and advertising campaigns.

7. Information collected from advertising partners and analytics providers

In connection with certain marketing and advertising campaigns, we may collect and process certain information from our advertising providers and analytics providers that is connected or associated with you and linked or connected to your interaction with our campaigns.

8. Information collected from third party business partners and Merchants

We may collect personal information from business partners and Merchants in connection with co-branded product offerings, advertising, or promotional campaigns. Some content or applications, including advertisements, on the Website and App are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies, alone or in conjunction with web beacons or other tracking technologies, to collect information about you when you use our Services. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites, apps, and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

9. Information collected from payment providers

We may collect or receive limited personal information from payment providers in connection with our processing of transactions or orders in connection with our Services.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information, for several reasons:

- To provide our Services and its contents to you

We use your information to provide you the Services. For example, we use credit card information to complete a transaction or we use your name and phone number to

allow Merchants to identify you and fulfill your order. In performing or providing the Services, we may disclose your information to another party or person to facilitate the performance or fulfillment of the Services (e.g., sharing personal information with Merchants or with your bank to validate your payment card, etc.). In such an event, we enter into contractual agreements with such parties or persons to protect your information.

- To communicate with you and provide you with information, products, or services that you request from us

We use your information to communicate with you. For example, we may send you text messages or other notifications about the status of your order. We may also contact you with promotional offerings or other communications that may be of interest to you, and notify you about changes to our Website, App, or any product or services we offer or provide through either the Website or App.

In the event you contact us, we use certain information to respond to your questions and assist you with any issues that may arise in your use of the Services. If you send direct messages, such as chat or text messages to Eate Digital, we may use a third-party service provider to monitor and analyze these messages. We monitor these messages for fraud prevention, to ensure appropriate charging of fees, to enforce our Terms of Use, and for quality and training purposes. As part of this process, Eate Digital and its service provider(s) may receive in real time and store data about your direct messages, such as chat or text messages, including the date and time of the text message, your phone number, email address, and the message. If you do not agree with the monitoring of direct messages you send to Eate Digital, please do not send messages to us.

- To set up, maintain, support, and improve our Services

We use your information for our everyday business operations such as auditing, administration of the Services and business activities, fulfillment, analytics, debugging to identify and repair errors that impair existing intended functionality, conducting internal research for technological development and demonstration, and undertaking activities to verify or maintain the quality or safety of our Website, App, and Services. Your information may also be used to improve the content and/or functionality of the Services. We may use your information to help us enhance offerings for Eate Digital, Carte, and our Merchants. We may process your information, either on an individual level or aggregated with information from or about Users, to analyze trends in the use of our Services and to improve and enhance our Services. We may also use aggregate information about Users and their activities in connection with our Services to provide suggestions or recommendations to Merchants relating to the Merchant's use of our Services.

- To monitor the use of our Services in order to detect security incidents

We care about keeping you secure and safe while using our Services. Keeping you safe requires us to process your personal information, such as your device information, activity information and other relevant information. We use such information to combat spam, malware, malicious activity or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not gain access to your information.

- To maintain legal and regulatory compliance

Our Services are subject to certain laws and regulations which may require us to process your personal information. For example, we process your personal information to fulfill our business obligations or as necessary to manage risk as required under applicable law.

- To enforce our Terms of Use and other agreements

When you access or use our Services, you are bound to our Terms of Use, Subscription Agreement (if you are a Merchant), and this Policy. To ensure you comply with them, we process your personal information by actively monitoring, investigating, preventing and mitigating any alleged or actual prohibited, illicit or illegal activities on our Services. We also process your personal information to: investigate, prevent or mitigate violations of our internal terms, agreements or policies; enforce our agreements with third parties and business partners.

- To engage in certain internal and external marketing, research, and advertising activities and to personalize your experience or use of the Services

In addition to the marketing and advertising activities described elsewhere in this Policy, including in the Cookies and Similar Technologies Section of this Policy, we engage in the following activities:

- *Look-alike Modeling.* We may use personal information and/or link personal information to a third-party cookie or other similar technology to develop audience insights and/or look-alike models in connection with our marketing campaigns, which models are used to market or advertise the Services on third party platforms (e.g., websites, apps, etc.) to people who exhibit similar characteristics with the look-a-like modeled data.
- *Audience Insights/Ad Measurement.* We may use the personal and transactional information collected from or about you and your use of our Services and platforms to gather audience insights and engage in ad effectiveness measurement. In connection with this activity, we may share personal and transactional information about you and your use of our Services and platforms with our service providers, processors and business partners for the purposes of

ad insight and ad effectiveness measurement reporting (either on an individual user level or an aggregate level), which will be used to create, enhance, and improve our Services and platforms and to create, enhance, improve, and implement marketing campaigns and content.

- *Cross-context behavioral advertising. We may engage in targeted marketing or advertising to a User based upon the User's personal information obtained from the User's activity across another company's distinctly-branded websites, applications, or services, however, such activities are only on our behalf and for the benefit of us and the Services.*

We also use your information to personalize your experience. For example, we may personalize the content and features you see when visiting our Services. In addition, we may personalize advertisements, marketing communications, and recommendations to make them more tailored to your interests.

We may also use aggregate information about Users and their activities in connection with our Services to provide suggestions or recommendations to Merchants relating to the Merchant's marketing activities and the Merchant's use of our Services.

- To protect you, others, and Eat Digital

We use your information to protect you, others, and Eat Digital, including, without limitation, using information for fraud prevention, for enforcement of our Terms of Use, to comply with the law, and to protect against security risks.

- For our business purposes

We may use your information for any other purpose we may describe when you provide the information, or for any other purpose with your consent.

Disclosure of Your Information

We may disclose aggregated information about our Users and information that does not identify any individual without restriction. We may disclose Personal Information that we collect, or you provide as described in this privacy policy:

- To third parties to market their products or services to you if you have not opted out of these disclosures;
- With affiliates or subsidiaries, business partners, service providers, Merchants, or other third parties we use to provide you with the Services and its contents and functions. We use third party service providers that perform functions on our behalf, such as billing, payment processing, and shipping;
- To third parties when required or permitted by law;

- To professional services organizations in connection with exercising our rights and conducting our business activities
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our Users is among the assets transferred;
- To fulfill the purpose for which you provide it, INCLUDING SHARING YOUR INFORMATION WITH MERCHANTS AND PAYMENT PROCESSORS;
- For any other purpose disclosed by us when you provide the information; and
- With your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Eat Digital, our customers, or others.

Cookies and Similar Technologies

We use cookies, web beacons, pixels, session replay/screen capture, and similar technologies to collect information and personalize your experience with our Services. When we use session replay technology, we may collect on a real-time basis information on how you use and navigate the Services. This may include mouse movements, or other cursory inputs including AR/VR motions, and how you scroll through the Services. Additional information on other technologies we may use is set forth below.

For information on your opt-out rights under applicable data protection and privacy laws, please see the Your Privacy Rights and Choices Section of this Policy. Please note that even if you opt-out, you may still receive advertisements from us. However, in that case, the advertising will not be tailored to your interests. Please further note that the opt-out mechanisms will not impact or affect Eat Digital's non-interest based advertising on our platforms or Services.

A. Cookies

Cookies are small web files that a site or its provider transfers to your device's hard drive through your web browser that enables the site's or provider's system to recognize your browser and remember certain information.

How We Use Cookies – We use first-party and third-party cookies for the following purposes:

- to make our Services function properly;
- to improve our Services;
- to recognize you when you return to our platforms and to remember information you have already provided, such as your recently viewed merchants, recently viewed items, and/or items already in your cart;
- to collect information about your activities over time and across third party websites or other online services in order to deliver content and advertising tailored to your interests; and
- to provide a secure browsing experience during your use of our Services.

How to Manage Cookies – You may disable the use of cookies by modifying your browser settings. If you choose to disable cookies you may not be able to fully experience the interactive features of our Services. For more information on cookies and how to disable cookies visit www.ftc.gov/ftc/cookies.shtm

B. *Web Beacons*

Web beacons, also known as web bugs, pixel tags or clear GIFs, are tiny graphics with a unique identifier that may be included on our platforms to deliver or communicate with cookies, in order to track and measure the performance of our platforms and Services, monitor how many web visitors we have, and to monitor the effectiveness of our advertising. Unlike cookies, which are stored on the user's hard drive, web beacons are typically embedded invisibly on webpages (or in an email).

C. *Online Analytics and Advertising Technologies*

We and our third-party vendors may use automated technologies (including cookie identifiers on our platforms), along with other collected information, to tailor ads or deliver content when you are on our Services or on other devices, apps or websites.

D. *Targeted Advertising*

We (or our service providers) may use the information we collect, for instance, IP addresses and unique mobile device identifiers, to locate or try to locate the same unique users across multiple browsers or devices (such as smartphones, tablets, or computers), or work with providers that do this, in order to better tailor content and features and provide you with a seamless experience across devices. If you wish to opt out of such cross device tracking for purposes of interest-based advertising, you may do so through your device settings. We may also use cross-device tracking to help identify our users and serve advertising. This type of advertising is often called "interest-based" or "personalized" advertising and when it occurs on mobile apps, "cross-app" advertising.

You can learn more about interest-based advertising and how to opt-out of receiving tailored advertising by visiting (i) the Network Advertising Initiative's Consumer [Opt-Out link](#) or (ii) the Digital Advertising Alliance's Consumer [Opt-Out link](#). To opt out of Google

Analytics for display advertising or customize Google display network ads, you can visit the [Google Ads Settings page](#). These links are provided for convenience purposes only; Eate Digital is not responsible or liable for the compliance practices and programs of the companies managing the opt-out processes available through the above links.

E. *Mobile Applications*

Depending on your permissions, we may receive your personal information from your Internet service and mobile device providers. Users of mobile devices who do not want to receive interest-based advertising may opt-out in several ways. Learn more about your choices for mobile devices by visiting <http://www.aboutads.info/appchoices>. Each operating system, (iOS for Apple phones, Android for Android devices, etc.) provides its own instructions on how to prevent the delivery of tailored in-application advertisements. You should view your device or system settings to determine how you can opt out of use of your device ID for “cross-app” personalized advertising.

Data Transfers to Other Countries/Territories

At times we may need to share your personal data with our affiliates and third-party service providers. For Data Subjects from the European Economic Area (“EEA”), we may transfer your Personal Information outside the EEA for processing pursuant to the purposes outlined above. When you provide us Personal Information, you understand and agree that it may be transferred across national boundaries and processed outside the EEA, including by trusted third parties. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. If we do this, we have procedures in place to ensure your personal data receives the same protection as if it were being processed inside the EEA. Including, but not limited to, entering into contracts with our affiliates and third-party service providers which stipulate the standards they must follow at all times including the Standard Contractual Clauses.

Retention Policy

We will retain your Personal Information for as long as necessary to fulfil the purposes for which we collected it, including the purposes of satisfying any legal, accounting, or reporting requirements.

Your Privacy Rights and Choices

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies or alert you when cookies are being sent. Note that some parts of the Services may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share or sell your Personal Information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by contacting us using the information provided in this Policy.
- **Promotional Offers from the Company.** If you do not wish to have your information used by us to promote our own or third parties' products or services, you can opt-out by contacting us using the information provided in this Policy. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by contacting us using the information provided in this Policy.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way.

Certain data protection laws may provide you with more privacy rights than those listed above, depending on your citizenship or residency.

A. Privacy Rights for Individuals in the European Economic Area ("EEA")

Under the European Union's General Data Protection Regulation ("GDPR"), individuals in the EEA have additional privacy rights:

- **Right to be Informed.** Individuals have the right to transparency regarding our collection of personal data.
- **Right of Access.** Individuals have the right to know exactly what information is held about them and how it is processed.
- **Right of Rectification.** Individuals will be entitled to have personal data rectified if it is inaccurate or incomplete.
- **Right to Erasure.** Also known as 'the right to be forgotten', this refers to an individual's right to having their personal data deleted or removed without the need for a specific reason as to why they wish to discontinue.
- **Right to Restrict Processing.** An individual's right to block or suppress processing of their personal data.
- **Right to Data Portability.** This allows individuals to retain and reuse their personal data for their own purpose.
- **Right to Object.** In certain circumstances, individuals are entitled to object to their personal data being used.

- **Rights of Automated Decision Making and Profiling.** The GDPR has put in place safeguards to protect individuals against the risk that a potentially damaging decision is made without human intervention.

If you wish to exercise your rights under the GDPR, please contact us using any of the methods provided in the “Contact Us” section below. We will consider and process your request within a reasonable period of time. Please be aware that under certain circumstances, the GDPR may limit your exercise of these rights.

You may file a complaint with EU data protection authorities (“DPAs”). A list of DPAs from the European Commission may be found here:
http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=50061.

B. Your California Privacy Rights

This section is our **Privacy Notice for California Residents** (“Notice”) and applies to visitors, users, and others who reside in the State of California (“consumers,” or “you/your”) and use our Services. This notice is provided to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Notice. This Notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

Third-Party Sites

Some of the functionality may be provided by third parties and the Services may link to other third-party websites that are not controlled by Eate Digital. These third parties are not under our control and Eate Digital is not responsible for their privacy policies or practices. If you provide any personal information to any third party or through any such third-party website, we recommend that you familiarize yourself with the privacy policies and practices of that third party.

Children’s Information

A. Our Services are not intended for children under 13 years of age, and we do not knowingly collect personal information from children under the age of 13. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personal information to us, please contact us at legal@eatedigital.com. A parent or guardian of a child under age 13 may review and request deletion of the child’s personal information. Parents or guardians should closely monitor their User accounts to ensure that the accounts are properly used.

B. In connection with our business-to-business relationships, we do not knowingly process any personal information of or about a child.

C. If we become aware that personal information we collected is associated with a minor under 13 years of age, we will delete that personal information.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

1. Access to Specific Information and Data Portability Rights.

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request (see “Exercising Your Rights” section), we will disclose to you:

- The categories of Personal Information we collected about you;
- The categories of sources for the Personal Information we collected about you;
- Our business or commercial purpose for collecting or selling that Personal Information;
- The categories of third parties with whom we share that Personal Information;
- The specific pieces of Personal Information we collected about you (also called a data portability request);
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - Sales, identifying the Personal Information categories that each category of recipient purchased; and
 - Disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

2. Deletion Request Rights.

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see “Exercising Your Rights” section), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated

within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.

- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

3. Exercising Your Rights.

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at legal@eatedigital.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to Personal Information associated with that specific account.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Please be aware that under certain circumstances, the CCPA may limit your exercise of these rights.

4. Response Timing and Format.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Data Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Services. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

Changes to Our Privacy Policy

It is our policy to post any changes we make to this Policy on this page. If we make material changes to how we treat our users' Personal Information, we will notify you by the email address specified in your account and/or through a notice on the Website or the App. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting this Policy to check for any changes.

Contact Us

To ask questions or comment about this Policy and our privacy practices, contact us at:

Eate Digital Solutions, Inc.
159 N Sangamon St
Ste 200 & 300
Chicago, IL, USA 60607
legal@eatedigital.com