

## Restaguru Privacy Policy

### Privacy policies

Conway Limited and/or its affiliates ("Restaguru", "the "Company," "we," "us," and "our,") respect your privacy and is committed to protecting it through its compliance with its privacy policies. This policy describes:

- the types of information that Restaguru may collect from you when you access or use its websites, applications and other online services (collectively, referred as "Services"); and
- its practices for collecting, using, maintaining, protecting and disclosing that information.

This policy applies only to the information Restaguru collects through its Services, in email, text and other electronic communications sent through or in connection with its Services.

This policy DOES NOT apply to information that you provide to, or that is collected by, any third-party, such as restaurants at which you make reservations and/or pay through Restaguru's Services and social networks that you use in connection with its Services. Restaguru encourages you to consult directly with such third-parties about their privacy practices.

Please read this policy carefully to understand Restaguru's policies and practices regarding your information and how Restaguru will treat it. By accessing or using its Services and/or registering for an account with Restaguru, you agree to this privacy policy and you are consenting to Restaguru's collection, use, disclosure, retention, and protection of your personal information as described here. If you do not provide the information Restaguru requires, Restaguru may not be able to provide all of its Services to you.

Your data controller is responsible for the collection, use, disclosure, retention, and protection of your personal information in accordance with its privacy standards as well as any applicable national laws. Your data controller may transfer data to other members of Restaguru as described in this Privacy Policy.

### The information we collect and how we use it

Restaguru ( Conway Limited) collects several types of information from and about users of our Services, including:

- Your Personal Information("PI") - Personal Information is the information that can be associated with a specific person and could be used to identify that specific person whether from that data, or from the data and other information that we have, or is likely to have access to. We do not consider personal information to include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise.
- Information about your internet connection, the equipment you use to access our Services and your usage details.

### We collect this information:

- directly from you when you provide it to us; and/or
- automatically as you navigate through our Services (information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies).

## How we use the information we collect

We use the information we collect from and about you for a variety of purposes, including to:

- Process and respond to your queries
- Understand our users (what they do on our Services, what features they like, how they use them, etc.), improve the content and features of our Services (such as by personalizing content to your interests), process and complete your transactions, and make special offers.
- Administer our Services and diagnose technical problems.
- Send you communications that you have requested or that may be of interest to you by way of emails, or courier, or registered post, or telephone calls, or any other mode of communication. We may also share your preferences or the Services availed by you with your network followers on Restaguru for marketing and other promotional activities of our Services.
- Send you questions from other users that you may be able to answer if you have registered with Restaguru.
- Enable us to show you ads that are relevant to you.
- Generate and review reports and data about, and to conduct research on, our user base and Service usage patterns.
- Administer contests and sweepstakes.
- Provide you with customer support.
- Provide you with policies about your account.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you about changes to our Services.
- Allow you to participate in interactive features offered through our Services.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-party goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data and/or adjust your user preferences in your account profile.

We may use the information we have collected from you to enable us to display advertisements to our advertisers'/service providers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

## How we share the information we collect

We may disclose personal information that we collect or you provide, as described in this privacy policy, in the following ways:

### General Information Disclosures

- To contractors, advertisers/service providers and other third-parties whom we use to support our business (e.g. dinner reservations and food delivery) and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- 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 Restaguru's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by r about the users of our Services are among the assets transferred.

- To third-parties to market their products or services to you if you have consented to receive the promotional updates. We contractually require these third-parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- **Service Providers.** We may share your information with outside vendors that we use for a variety of purposes, such as to send you emails and messages on behalf of other Restaguru members, push notifications to your mobile device on our behalf, provide voice recognition services to process your spoken queries and questions, help us analyze use of our Services, and process and collect payments. Some of our products, services and databases are hosted by third party hosting services providers. We also may use vendors for other projects, such as conducting surveys or organizing sweepstakes for us. We may share information about you with these vendors only to enable them to perform their services.
- **Legal Purposes.** We may share your information when we believe in good faith that such sharing is reasonably necessary in order to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process. We may also share your information to investigate and address threats or potential threats to the physical safety of any person, to investigate and address violations of this Privacy Policy or the Terms of Service, or to investigate and address violations of the rights of third parties and/or to protect the rights, property and safety of Restaguru, our employees, users, or the public. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations on account of legal request such as subpoena, court order or government demand to comply with the law.
- **Social Networks.** If you interact with social media features on our Services, such as the Facebook Like button, or use your social media credentials to log-in or post content, these features may collect information about your use of the Services, as well as post information about your activities on the social media service. Your interactions with social media companies are governed by their privacy policies.
- To enforce or apply our Terms of Use [[www.restaguru.com](http://www.restaguru.com)] and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Restaguru, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- Consent. We may share your information in any other circumstances where we have your consent.

### **Information Shared with Restaurants**

When you make a restaurant reservation or execute online food ordering transaction through our Services, your information is provided to us and to the restaurants with whom you choose to reserve. In order to facilitate your reservation and online food order processing, we provide your information to that restaurant in a similar manner as if you had made a reservation or food order directly with the restaurant. If you provide a mobile phone number, restaurants or Restaguru may send you text messages regarding your reservation or order's delivery status. Some restaurants also require you to provide credit or debit card account information to secure your reservation. When you make a restaurant reservation or online food ordering transaction through our Services and/or make a payment to a restaurant through our Services, we may also share with the restaurants additional information, such as information about your dining preferences and history or information that we collect from third-parties.

Information you choose to share with a restaurant when you make a reservation and/or pay a restaurant through our Services may be used by the restaurant for its own purposes. We do not control the privacy practices of restaurants. Please contact the restaurant directly if you want to learn about its privacy practices.

## **Payment Card Information**

To use certain of our Services, such as to make reservations at certain restaurants and to make payments to certain restaurants, we may require credit or debit card account information. By submitting your credit or debit card account information through our Services, you expressly consent to the sharing of your information with restaurants, third-party payment processors, and other third-party service providers (including but not limited to vendors who provide fraud detection services to us and other third parties), and you further agree to the following terms:

- When you use a credit or debit card to secure a reservation through our Sites, we provide your credit or debit card account information (including card number and expiration date) to our third-party payment service providers and the applicable restaurant.
- When you initially provide your credit or debit card account information through our Services in order to use our restaurant payment services, we provide your credit or debit card account information to our third-party payment service providers. As explained in our Terms of Use, these third parties may store your credit or debit card account information so you can use our restaurant payment services through our Services in the future.
- For information about the security of your credit or debit card account information, see the "Security" section below.

## **Analytics and tailored advertising**

To help us better understand your use of the Services, we may use third-party web analytics on our Services, such as Google Analytics. These service providers use the sort of technology described in the "Automatically-Collected Information" Section above. The information collected by this technology will be disclosed to or collected directly by these service providers, who use the information to evaluate our users' use of the Services. We also use Google Analytics as described in the following section. To prevent Google Analytics from collecting or using your information, you may install the Google Analytics Opt-Out Browser add-on.

### Tailored Advertising

Third parties whose products or services are accessible or advertised via the Services may also use cookies or similar technologies to collect information about your use of the Services. This is done in order to help them-

- Inform, optimize, and serve ads based on past visits to our website and other sites and
- Report how our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our website. We also allow other third parties (e.g., ad networks and ad servers such as Google Analytics, OpenX, PubMatic, DoubleClick and others) to serve tailored ads to you on the Services, and to access their own cookies or similar technologies on your computer, mobile phone, or other device you use to access the Services. We neither have access to, nor does this Privacy Policy govern, the use of cookies or other tracking technologies that may be placed by such third parties. These parties may permit you to opt out of ad targeting. If you are interested in more information about tailored browser advertising and how you can generally control cookies from being put on your computer to deliver tailored advertising (i.e., not just for the Services), you may visit the Network Advertising Initiative's Consumer Opt-Out Link, and/or the Digital Advertising Alliance's Consumer Opt-Out Link to opt-out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for Display Advertising or customize Google Display Network ads, you can visit the Google Ads Settings page. Please note that to the extent advertising technology is integrated into the Services, you may still receive ads even if you opt-out of tailored advertising. In that case, the ads will just not be tailored to your interests. Also, we do not control any of the above opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

When accessing the Services from a mobile application you may also receive tailored in-application advertisements. Each operating system: iOS, Android and Windows Phone provides its own instructions on how to prevent the delivery of tailored in-application advertisements. You may review the support materials and/or the privacy settings for the respective operating systems in order to opt-out of tailored in-application advertisements. For any other devices and/or operating systems, please visit the privacy settings for the applicable device or operating system or contact the applicable platform operator.

**Choices about how we use and disclose your information** We strive to provide you with choices regarding the personal information you provide to us. You can set your browser or mobile device to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of our Services may then be inaccessible or not function properly. We do not share your personal information with any advertising agency.

### **Communication choices**

When you sign up for an account, you are opting in to receive emails from other Restaguru users, businesses, and Restaguru itself. You can log in to manage your email preferences and follow the "unsubscribe" instructions in commercial email messages, but note that you cannot opt out of receiving certain administrative policy, service policy, or legal policy from Restaguru.

**Reviewing, changing or deleting information** If you would like to review, change or delete personal information we have collected from you, or permanently delete your account, please use the "Contact Us" link at the bottom of every page (also located here), or contact the Restaguru Data Protection Officer (DPO).

If you delete your User Contributions from our websites, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other users of our websites. Proper access and use of information provided on our websites, including User Contributions, is governed by our Terms of Use [[www.restaguru.com/conditions](http://www.restaguru.com/conditions)]

### **Accessing & correcting your personal information**

We will take reasonable steps to accurately record the personal information that you provide to us and any subsequent updates.

We encourage you to review, update, and correct the personal information that we maintain about you, and you may request that we delete personal information about you that is inaccurate, incomplete, or irrelevant for legitimate purposes, or are being processed in a way which infringes any applicable legal requirement.

Your right to review, update, correct, and delete your personal information may be limited, subject to the law of your jurisdiction:

- If your requests are abusive or unreasonably excessive,
- Where the rights or safety of another person or persons would be encroached upon, or
- If the information or material you request relates to existing or anticipated legal proceedings between you and us, or providing access to you would prejudice negotiations between us or an investigation of possible unlawful activity. Your right to review, update, correct, and delete your

information is subject to our records retention policies and applicable law, including any statutory retention requirements.

### **Security: How we protect your information**

We have implemented appropriate physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access to your information and to maintain data security. These safeguards take into account the sensitivity of the information that we collect, process and store and the current state of technology. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. The third party service providers with respect to payment gateway and payment processing are all validated as compliant with the payment card industry standard (generally referred to as PCI compliant service providers).

We assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access, or other causes beyond our control. You play an important role in keeping your personal information secure. You should not share your user name, password, or other security information for your Restaguru account with anyone. If we receive instructions using your user name and password, we will consider that you have authorized the instructions.

### **Permissible Age**

The Services are not intended for users under the age of 18, unless permitted under applicable local laws (Permissible Age). We do not knowingly collect any personal information from users or market to or solicit information from anyone under the Permissible Age. If we become aware that a person submitting personal information is under the Permissible Age, we will delete the account and any related information as soon as possible. If you believe we might have any information from or about a user under the Permissible Age, please contact us at [hello@restaguru.com](mailto:hello@restaguru.com).

### **Third party links and services**

The Services may contain links to third-party websites. Your use of these features may result in the collection, processing or sharing of information about you, depending on the feature. Please be aware that we are not responsible for the content or privacy practices of other websites or services which may be linked on our services. We do not endorse or make any representations about third-party websites or services. Our Privacy Policy does not cover the information you choose to provide to or that is collected by these third parties. We strongly encourage you to read such third parties' privacy policies.

## EU privacy/data protection rights

EU General Data Protection Regulation (GDPR) has provided the below rights to the EU residents:

- Right to information - including contact details to the DPO, the purposes for processing Personal Information and the rights of the individual.
- Right to access the Personal Information that are processed
- Right to erasure ("Right to be forgotten")
- Right to rectification
- Right to restriction of processing
- Right to data portability of the Personal Information supplied to Restaguru by the EU resident
- Right to object (opt-out) to processing (unless Restaguru otherwise has compelling legitimate grounds)

EU residents can exercise these rights by raising a request directly at [hello@restaguru.com](mailto:hello@restaguru.com) or contact us at the information provided in CONTACT US section.

## Data retention and account termination

You can close your account by visiting your profile settings page on our website. We will remove your public posts from view and/or dissociate them from your account profile, but we may retain information about you for the purposes authorized under this Privacy Policy unless prohibited by law. Thereafter, we will either delete your personal information or de-identify it so that it is anonymous and not attributed to your identity. For example, we may retain information to prevent, investigate, or identify possible wrongdoing in connection with the Service or to comply with legal obligations.

## Contact us

If you have any queries relating to the processing/ usage of information provided by you or Restaguru's Privacy Policy, you may email the Data Protection Officer (DPO) at [hello@restaguru.com](mailto:hello@restaguru.com) or write to us at the following address:

CONWAY, S.L  
"Restaguru"  
Margalló Street, 60  
08415 Bigues (Barcelona)  
SPAIN