

## **PRIVACY POLICY**

### **Introduction**

Deluxe Caterers Private Limited (“we”, “us”, “the website”, “Company”) is strongly committed to the data subject’s (“you”, “your”, “subscriber”, “user”) right to privacy and to keeping your information secure. This privacy policy sets out how we obtain, use, share, and protect personal information, including through your use of our website, application or other services (regardless of where you visit it from) and any services we may provide (“Service/s”). It also explains what rights you have to access, to change or to delete your personal data. “Personal Data” or “Personal Information” shall mean any information relating to an identified or identifiable natural person (“you”) who can be identified, either directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This Privacy notice should be read in conjunction and together with the Terms of Service applicable to the service (website, application or other service) you are using.

Our sites and applications may contain links to other sites not owned or controlled by us and we are not responsible for the privacy practices of those sites. Therefore, you should read the policies governing those third-party websites.

### **User consent**

By using our Services, you agree to our collection, use and sharing of your personal information as described in this policy. In some cases, particularly if you reside in a country governed by a data protection regulation, we may ask you to provide explicit consent to access our services before proceeding for further operations.

### **Collection of personal Information and it’s use**

Company does not collect personally identifiable information about you except when you specifically and knowingly provide it. Company and its service partners use your personally identifiable information to operate the sites and services and to inform you of new features, services, and content from the Company and its affiliates.

### **I. Information you provide to us voluntarily or during direct interaction**

We may ask for and collect the following personal information about you when you use the website and without this information, we may not be able to provide you with all the requested services:

- Identity Data includes first name, maiden name, last name, username or similar identifier, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.

- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, and feedback and survey responses.
- Usage Data includes information about how you use the website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

### **II. Information collected through automated technology or interaction**

We collect information about you and your use of our service, your interactions with us and our service partners, as well as information regarding your computer or other devices used to access our Services (such as mobile devices, tablets and other viewing devices). This information may include, but is not limited to:

- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Activities on the website such as type of pages viewed, time spent on pages, search queries etc.
- Advertising identifiers, such as those found on the websites in the form of GAID or Cookie ID on browsers.
- Information collected via the use of cookies and other technologies.

**Note:** To improve the responsiveness of the "Website" for our users, we may use "Cookies", or similar electronic tools to collect information to assign each visitor a unique, random number as a User Identification to understand the user's individual interests using the identified computer. Cookies are small files which are stored on a user's computer and are used in order to make the website work more efficiently. In case the necessary Cookies are disabled, the website may not work properly or may impact performance of the website. We would also like to set optional analytics cookies to help us improve user experience and help us remember your preferences. You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. In order to do this, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” facility). Disabling a cookie or category of cookie does not delete the cookie from your browser; you will need to do this yourself from within your browser. If you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

For further information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, <http://www.allaboutcookies.org/> and <http://www.youonlinechoices.eu>.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Unless you voluntarily identify yourself (through registration), we would not know who you are, even if we assign a cookie to your computer. The only personal information which a cookie can hold is the information that you supply. A cookie cannot read data from your hard drive.

We receive and store certain types of information whenever you interact with us via website(s), through your computer / laptop / notebook / mobile / tablet / pad / handheld device or any other electronic device capable of connecting to internet.

We may track certain information about you based upon your behaviour on the website. We use this information for conducting internal research on our users' demographics, devices, interests, and behaviour to better understand, protect and serve our users. This information is compiled and analysed on an aggregated basis and to understand:

- Your interests for the articles published on the website.
- Perform analytics and conduct customer research, to determine your interest, for identifying and analysing traffic patterns.

### **Purposes and processing**

The website will only collect and process personal data or personal information about you where we have lawful basis. Lawful basis on which we would process your personal information includes obtaining explicit consent from you for processing your personal information or processing for "legitimate interests" where processing is necessary by us to provide you with our services.

We may also use your personal information to provide, analyse, administer, enhance and personalize our service and marketing efforts, to process your registration, and to communicate with you related to the cases mentioned below. E.g., we may use your personal data generally for the following:

- where we need to perform a contract, we are about to enter into or have entered into with you.
- determine your requirements and provide personalized suggestions, tips and promotional content for various topics all of which we think will be of interest to you, as applicable.
- Notify you about changes in terms of service.
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- to comply with a legal or regulatory obligation.

- our service providers, including logistics providers, such as those who deliver our orders and emails.
- technical and support partners, such as the companies who host our website and who provide technical support and back-up services.
- law enforcement agencies, government or public agencies or officials, regulators, and any other person or entity that has the appropriate legal authority where we are legally required or permitted to do so, to respond to claims, or to protect our rights, interests, privacy, property or safety.

We provide personalisation by using data that you submit to us in terms of cookies, IP addresses, web beacons or similar technologies in relation to the devices you use. By doing so, we can provide you with contents and/or advertising that we believe is more relevant to your interests. Please provide explicit consent for the same when we collect your data..

You may also raise a request to us to alter your consent choices.

### **Information used by the company**

The Information as supplied by the users enables us to improve the Services and provide you the most user-friendly experience.

Any personally identifiable information provided by you will not be considered as sensitive if it is freely available and / or accessible in the public domain like any comments, messages, blogs, scribbles available on social platforms like Facebook, twitter, Instagram etc. Any posted/uploaded/conveyed/communicated by users on the public sections of the website or the Application becomes published content and is not considered personally identifiable information subject to this Privacy policy.

In case you choose to decline to submit personally identifiable information, we may not be able to provide certain services to you. In any case, we will not be liable and or responsible for the denial of certain services to you for lack of you providing the necessary personal information. When you register on the website, we contact you from time to time about updating your personal information to provide the users such features that we believe may benefit / interest you.

### **Disclosure to third parties**

#### **a. General Disclosure:**

At times the website may make certain personal information available to strategic partners that work with the website to provide service, or that help the website market to users. Personal information or personal data will only be shared by the website to provide or improve our service and marketing aspects. We may disclose your personal information to third parties including the following:

- Any individual or entity whether a parent or subsidiary undertaking or any affiliates or group company of ours.
- Any third-party service providers such as our vendors, consultants, advertising partners, marketing partners and other service providers or business partners, including logistics providers, such as those who deliver our orders and e-mails.

- Our catering / restaurant partners.
- Third party for academic and research purposes.
- Our professional advisers, including our accountants, auditors and lawyers.
- Technical and support partners, such as the companies who host our website and who provide technical support and back-up services.
- Individual records such as IP addresses as may be required by law.
- Agencies or any person assisting us during any investigation and/or detection and/ or for prevention from any actual or potential threat, cybercrime, fraud or any illegal acts.
- Law enforcement agencies, government or public agencies or officials, regulators, and any other person or entity that has the appropriate legal authority where we are legally required or permitted to do so, to respond to claims, or to protect our rights, interests, privacy, property or safety.
- In the event the Company is merged with or acquired by another company or in case of re-organization or restructuring of business, we and our affiliates may share your personal information, wholly or in part, with another business entity.

- Act under exigent circumstances to protect the personal safety of users of the website, the site, its owners, or the public.
- to prevent, investigate, detect or prosecute criminal offenses or attacks on the technical integrity of our websites or our network.
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, or if all or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
- We may need to share details with third parties (such as auditors or legal advisors) to obtain advice. Any such processing will be governed by an agreement in the form required by law, preserving any statutory data protection rights.

#### **b. Service providers**

We may disclose your information if we use third party processors to administer and process your personal information for the purposes notified in the Privacy notice, e.g. for hosting activities related to the use of our Sites or services. The website may include links to various third-party websites that may collect Your Personal Information. Use of personal data collected by such third-party platform will be governed by the privacy notice in such third party platform. Such websites or applications are governed by their respective privacy policies, which are beyond our control. Once you leave our servers (you may check the URL in the location bar on your browser), use of any information you provide is governed by the privacy notice of the operator of the application, and you are visiting which may differ. If you can't find the privacy notice of any of these sites via a link from the application's homepage, you should contact the application owners directly for more information.

We may share non-personally identifiable information publicly and with our service partners. For example, we share information publicly to show trends about the general use of our services. We also allow specific partners to collect information from your browser or device for marketing / promotions and measurement purposes using their own cookies or similar technologies.

#### **c. Legal**

The website may disclose personally identifiable information if required to do so by law or in the good-faith belief that such action is necessary to:

- conform to the edicts of the law or comply with legal process served on the site or its owners.
- protect and defend the rights or property of the site-owners, the site or the users of the website.

#### **Your controls and choices**

We provide you the ability to exercise certain controls and choices regarding our collection, use and sharing of your personal information. In accordance with applicable law, your controls and choices may include:

##### **a. Rectification of Inaccurate or Incomplete Information**

You can ask us to correct inaccurate or incomplete personal information concerning you by sending us an e-mail.

You can access and update some of your personal information through your account settings. You are responsible for keeping your personal information up to date. The website may send you periodic reminders via e-mail to maintain the accuracy of your personal information.

##### **b. Data Retention and Erasure**

We retain your personal information as long as necessary for the legitimate interests specified in this policy and for us to comply with our legal obligations. If you no longer want us to use your information, then you can request that we erase your personal information and close your account.

Please note that if your request for the erasure of your personal information;

- We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations and reasons of public interests in the area of public health. For example, we may keep some of your information for tax, legal reporting and auditing obligations.
- Information you have shared with others (e.g., Reviews, forum postings) may continue to be publicly visible on the website, even after your account is cancelled. However, attribution of such information to you will be removed. Additionally, some copies of your information

(e.g., log records) may remain in our database, but are disassociated from personal identifiers.

- Because we maintain copies of personal information to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.
- For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

#### **c. Withdrawing consent and restriction of processing**

For withdrawing your consent at any time during the tenure of your services with us, you may choose to do so by sending us an e-mail.

#### **d. Objection to processing**

Where your personal information is processed for direct marketing purposes, you may, at any time ask us to cease processing your data for these direct marketing purposes by sending an e-mail to us.

Please be aware that if you do not allow us to collect personal information from you, we may not be able to deliver certain experiences, products, and services to you, and some of our services may not be able to take account of your interests and preferences. If collection of personal information is mandatory, we will make that clear at the point of collection so that you can make an informed decision whether to participate. If you have questions about the specific personal information about you that we process or retain, and your rights regarding that personal information, please contact our customer support team.

#### **Children's privacy**

The website is not intentionally designed for or directed at persons less than 18 years of age. The Company does not knowingly permit any person who is under 18 years of age to register with the services or to provide any other personally identifying information and may cause to delete any such information and notify the parent.

However, we consider it the responsibility of parents to monitor their children's use of our services. Nevertheless, it is our policy not to collect and process any personal information from children below 18 years of age or offer to send any promotional materials to persons in that category. The Company does not seek or intend to seek or receive any personal information from children. Should a parent or guardian have reasons to believe that a minor has provided the Company with personal information without their

prior consent, please contact our customer support team to ensure that the personal information is removed from the website.

#### **Data transfer, storage & processing globally**

We operate globally and may transfer your personal information to our individual companies affiliated companies or third parties in locations around the world for the purposes described in this privacy notice. Wherever your personal information is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. Additionally, when using or disclosing personal information transferred from the European Union, we use standard contractual clauses approved by the European Commission, adopt other means under European Union law for ensuring adequate safeguards.

#### **Security and compliance with laws**

If you know or have reason to believe that your account credentials have been lost, stolen, altered, or otherwise compromised or in case of any actual or suspected unauthorized use of your account, please contact us immediately through the customer support team.

#### **Change in policy**

This Privacy notice is subject to change from time to time. We reserve the right, at our sole discretion, to modify the terms of this Privacy notice from time to time in order to ensure compliance with applicable laws ("Updated Terms"). The Updated Terms shall be effective immediately and shall supersede the terms of this Privacy notice. We will notify you of any changes to this privacy notice if the changes made to the policy significantly affects your rights or as may be required by law. You shall be solely responsible for reviewing the Privacy notice from time to time for any modifications. By continuing to use the website after the updated Terms have been published, you affirm your agreement to the updated terms.

#### **Contact information**

##### **Deluxe Caterers Private Limited**

Address at: 1, Rashid Mansion, Dr. Annie Besant Road, Lotus Junction, Worli, Mumbai 400018

Email: [info@charcoalconcepts.com](mailto:info@charcoalconcepts.com)

You can contact us in case of any grievance or complaint on the Customer contact link. If you have any queries, complaints regarding the collecting, processing, transfer of personal data/information or regarding this policy please do contact us on the above email.

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