

Americana Restaurants International Plc Website Privacy Policy

This Website Privacy Policy (“**Policy**”) explains how Americana Restaurants International Plc and its affiliates or subsidiaries (“**Americana**”, “**we**”, “**our**”, “**us**”) use and protect any information that you provide to us when you use this website (the “**Website**”) or our services (the “**Service**”).

Please read this Policy carefully and feel free to contact us using the contact information below if you have any questions. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy.

1. Information we collect about you

When you create an account with Americana, order from, use or engage with our Website, use our Service, fill in the “Contact Us Form”, or sign up to our newsletters or, we may collect the following kinds of information:

- Personal information, including: name, email addresses, location, physical addresses, telephone numbers, and date of birth.
- Payment Information, including: credit card information when you make a purchase.
- Demographic information, including: age, and information about food you like.
- Website usage information, collected through cookies, including: IP addresses and user browsing behavior. Please refer section 7 of this Policy for the details.
- Reputation Management Information.

2. How we use your information

We may use the information we collect from you in the following ways:

- To provide you the Services you request, including to fulfill orders or prizes, and to register you for promotions on our Website.
- To process payment, applications and transactions;
- To respond to questions, comments, and other requests;
- For assessment and analysis of our market, customers and Service;
- To understand the way you use our Service so that we can improve our Service;
- To manage our databases and accounts;

- For administrative purposes including internal quality controls;
- To deliver advertising, including customized advertisements and promotional communications;
- For security purposes to protect our website, customers and business partners.
- To communicate with you about your account and notify you of any updates to this Policy.

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including [traffic data,] [location data,] [logs,] and other communication data and the resources that you access and use on the Website; and
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

3. Legal Bases

Our legal grounds for processing your personal information are that the processing is:

- Necessary for the performance of a contract between you and us, for example if we're providing you with a Service that you have requested or agreed to;
- Necessary for compliance with Americana's legal obligations;
- With your consent or at your direction.

If you do not provide certain information to us, we may, in some circumstances, be unable to comply with our obligations or provide you with the Service that you request. We will tell you about the implications of not providing certain information.

4. Sharing information with third parties

We will not disclose your information to third parties for their own independent marketing without your consent. However, we may disclose your information to the following entities:

- **Affiliates and subsidiaries.** Your information may be shared among our affiliates and subsidiaries for the purposes described in this Policy. The term 'affiliates and subsidiaries' refers to companies related to Americana by common ownership or control.
- **Business Partners.** We also may share your information with trusted business partners. These entities may use your information to provide you with services you request.

- **Service providers and Vendors.** We may also disclose your information to companies that provide product and services for us or on our behalf, such as companies that help us with billing or that send emails on our behalf. These entities cannot use your information for purposes other than providing services for us.
- **Other parties when required by law or as necessary to protect our Services.** There may be instances where we disclose your information to other parties:
 - to comply with the legal obligations or legally binding disclosure orders (such as a search warrant or other court or regulatory order);
 - to verify or enforce compliance with the terms and policies governing our Services; and
 - to protect the rights, property, or safety of Americana , or any of our respective affiliates, business partners, or customers.
- **Other parties in connection with corporate transactions.** We may disclose your information to a third party as part of a merger or transfer, or in the event of a bankruptcy.
- **Other parties with your consent or at your direction.** In addition to the disclosures described in this Policy, we may share information about you with third parties when you consent to or request such sharing.

5. International transfers of personal information

We may transfer your personal information to countries other than the country in which the data was originally collected for the purposes described in this Privacy Notice. For example, international transfers of personal information are conducted internally, by and between Americana affiliates, and externally to third parties. The countries to which we transfer personal information may not have the same data protection laws as the country in which you initially provided the information. When we transfer personal information across borders, we consider a variety of safeguards that may apply to such transfers.

For transfers of personal information from Americana entities to third parties located in another country, we may use any of the following safeguards outlined below, as appropriate. If you have any questions about the safeguards used for a particular transfer to a third party service provider, please email legal@americana-food.com with your request. Specifically, we transfer personal information to:

- Countries that have been deemed to adequately safeguard personal information pursuant to applicable local laws;
- Pursuant to the recipient's compliance with standard contractual clauses;
- Pursuant to the consent of the individual to whom the personal information pertains; or
- As otherwise permitted by applicable local requirements.

6. Storage of personal information

We will keep your personal information for as long as necessary for the purposes for which they were collected and any other permitted purposes (such as to comply with regulatory requirements to retain such information). Our retention periods are based on business needs and relevant laws. In particular, we ensure that our retention periods will be reasonable and enable us to communicate with you, provide you with any services you request, maintain business records for audit purposes, meet recordkeeping requirements under the law, defend or bring any legal claims and deal with any queries or complaints you may have.

7. Cookies

Below we list examples of the different types of cookies that are or may be used on the Website and the purposes for which they are or may be used. Note that to the extent information collected through cookies constitutes personal information, as stated under this Policy.

7.1 Essential cookies

These cookies are essential to the Website and enable you to move around it and to use its services and features. Without these absolutely necessary cookies, the Website and its functionality may not work or display properly, and we may not be able to provide the Website or certain services or features you request and to comply with legal requirements, such as to ensure the security of the Website.

Kindly note that because these cookies are essential for accessing the Website, hence you cannot refuse them.

To the extent the use of these cookies involve the processing of personal data, Americana will rely on contractual necessity to conduct such processing. Americana uses the following types of essential cookies on the Website:

Cookie name/type	Purpose and Description
Session	Session cookies are used to maintain the state of the application.
User ID	User ID cookies are used to ensure that the names and passwords of the user are recorded and users only see their own information.
Security	Security cookies are used for security controls and checks.

7.2 Analytics / Performance Cookies. These cookies collect information about how you and other visitors use the Website, and enable us to improve the way it works. For example, analytics cookies show us which are the most frequently visited pages on the Website, help us record any difficulties you have with the Website, and show us whether or not our advertising is effective. This allows us to see the overall patterns of usage on the Website, rather than the

usage of a single person. The information these cookies collect is aggregated and is only used to improve how the Website works.

Cookie name/type	Cookie Owner	Description
Google Analytics	Google	Google Analytics cookies collect aggregate statistical data to improve Site presentation and navigation.

8. Keeping your information secure

We have put in place reasonable physical and technical measures to safeguard the information we collect in connection with the Service. However, please note that although we take reasonable steps to protect your information, no website, internet transmission, computer system or wireless connection is completely secure.

9. Your choices

We offer a variety of choices about how we use your information. You can make choices about whether to receive promotional communications from us by following the unsubscribe instructions included in the communication. In addition, you can also make choices by changing your settings for specific Services or when we give you a just-in-time notice, or by visiting relevant webpages.

10. Your rights

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes while you are still using our Service, including by updating your personal information directly where available (e.g. via your account). Subject to certain conditions and limitations, you have the legal right to request access to, rectify, and erase the personal information that we hold about you, or object to or restrict the processing of your personal information, as well as the right to data portability.

You can submit these requests by using our contact details in the section below. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions. Where the processing of your personal information is based on your consent, you have the right to withdraw the consent at any time. Requests should be submitted in writing to the address listed below in the “Contact Information” section. You also have the right to lodge a complaint with your data protection authority.

11. Links to other websites

Our Website may contain links to third party websites. We do not have any control over third party websites, and such websites are not governed by this Policy. We will not be responsible for the protection of any information which you provide while visiting third party websites. You should exercise caution when accessing third party websites, and review the privacy statements applicable to any third-party websites and services you use.

12. Contact Information

If you have any questions about this Policy, please contact us at the details below.

legal@americana-food.com.

13. Changes to this Policy

We may update this Policy from time to time. When we update this Policy, we will notify you of changes that are deemed material under applicable legal requirements by updating the “Effective Date” date above, posting the new Policy and providing other notification as required by applicable law. We recommend that you review the Policy regularly as you visit our Website to stay informed of our privacy practices.