



# Your Privacy Rights

Last Modified: May 25th, 2018

## Key Summaries

- PalFed does not share your data with anyone other than google analytics to analyze traffic patterns.
- Adverts are limited to single menu items from nearby restaurants, take-outs and food related adverts from other food related businesses. We use (but do not share) your like and dislike tags to help determine menu items that might appeal to you.
- In order to know who of your friends and which of our advertisers are nearby, we need to know your location. You have the option not to share this information, in which case we will not show you local menu items or nearby friends. Your location is not used in any other way, or shared with third parties.
- You may close your account at any time. 30 days after an account is closed, all personally identifiable information will be automatically permanently deleted. This does not include the title, food description, date and tags for any menu items you created. Please ensure to put any personal information in the notes field! If something gets through, please email [dpo@palfed.com](mailto:dpo@palfed.com) with the details and we will delete it for you.
- Make sure to read the full policy. The summary above does not cover all specifics, but aims to give a comprehensive high level overview.

PalFed, L.L.C. ("**Company**" or "**We**") respects your privacy and we are committed to protecting it through our compliance with this policy.

This Privacy Policy describes the types of information we may collect from you or that you may provide when you visit the website [www.palfed.com](http://www.palfed.com) (our "**Website**") and our practices for collecting, using, maintaining, protecting and disclosing that information. By accessing or using this Website, you agree to this Privacy Policy. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

This policy applies to information we collect:

on this Website;

in e-mail, text and other electronic messages relating to this Website; and

when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or

any third party, including our affiliates and subsidiaries, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. 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. This policy may change from time to time (see *Changes to our Privacy Policy*). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **Children Under the Age of 13**

Our Website is not intended for anyone under 13 years of age. No one under age 13 may access the Website or provide any information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13, we will delete that information.

Anyone under the age of 18 must have permission of an adult over the age of 21 years of age and permission of the cardholder to make a payment on the Website.

### **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of our Website, including information:

by which you may be personally identified, such as your name, e-mail address, and telephone number ("**Personal Information**");

that is about you but individually does not identify you, such as whether you are over the age of 18, the times and dates of your visit to the Website, and the content of your comments or postings on this Website; and/or

about your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

directly from you when you provide it to us;

automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses and information collected through cookies and other tracking technologies; and

from third parties, for example, our business partners.

### **Information You Provide to Us .**

The information we collect on or through our Website may include:

information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, posting materials, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem about or through our Website;

records and copies of your correspondence (including e-mail addresses), if you contact us;

details of transactions you carry out through our Website and of the fulfillment of your orders; and

your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, "**Posted**") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "**User Contributions**" or "Suggestions"). Your User Contributions are Posted and transmitted to others at your own risk. We are not liable for the actions of other users of the Website who may view your User Contribution or with whom you may choose to share your User Contributions.

### **Information We Collect Through Automatic Data Collection Technologies .**

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.

The information we collect automatically is statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

estimate our audience size and usage patterns;

store information about your preferences, allowing us to customize our Website according to your individual interests;

speed up your searches; and

recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

**Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

**Web Beacons.** Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an e-mail and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### **Third-Party Use of Cookies**

Some content or applications on the Website are served by third-parties, such as 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 website. 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 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. For information about how you can opt out of receiving targeted advertising from many providers (see *Choices About How We Use and Disclose Your Information*).

## **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

to present our Website and its contents to you;

to provide you with information, products or services that you request from us;

to fulfill any other purpose for which you provide it;

to provide you with notices about your account;

to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;

to notify you about changes to our Website or any products or services we offer or provide through it;

to allow you to participate in interactive features on our Website;

in any other way we may describe when you provide the information; and

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 our subsidiaries and affiliates;

to contractors, service providers and other third parties we use to support our business 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 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 Website users is among the assets transferred;

to third parties to market their products or services to you if you have consented to these disclosures. For more information, see *Choices About How We Use and Disclose Your Information*;

to fulfill the purpose for which you provide it. For example, if you give us an e-mail address to use an "e-mail a friend"

feature of our Website, we will transmit the contents of that e-mail and your e-mail address to the recipients;

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;

to enforce or apply our terms of use or terms of sale and other agreements, including for billing and collection purposes; or

if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Choices About How We Use and Disclose Your Information**

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 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 this site may then be inaccessible or not function properly.

**Third Parties.** 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. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's *website*.

### **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website and visiting your account profile page.

While you have the ability to access and correct any personal information that you have provided to us, you may also contact us via the contact page on <http://www.palfed.com> to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our terms of use.

### **Your California Privacy Rights**

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain

information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [contact@palfed.com](mailto:contact@palfed.com).

## **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All payments are made via a third party vendor that utilizes a secure and encrypted transmission portal.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

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 Website. 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 Website.

## **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the primary e-mail address specified in your account. The date the privacy 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 e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

## **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at: [contact@palfed.com](mailto:contact@palfed.com)