

# Privacy & Cookie Policy

DinnerGift is committed to protect your privacy and takes its responsibilities regarding the security of customer personal information very seriously.

Data controller:

Fire IT vof

Waversesteenweg 136

2500 Lier, Belgium

Enterprise number: 0822.374.809

## Scope of application

All capitalized words not defined herein shall have the same meaning as specified in the Terms and Conditions of DinnerGift (available on DinnerGift's website <https://dinnergift.be/terms>).

As used in this Privacy Policy, the terms "using" and "processing" of Personal Data (as defined below) include subjecting the personal information to statistical or other analysis and using or handling personal information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within the DinnerGift organization or among our affiliates within Belgium or internationally.

The terms of this Privacy Policy will govern the use of the Platform and contains important information on the collection and processing of Personal Data through the Platform by DinnerGift. By using the Platform, you consent to our Privacy Policy. If you do not agree with any of the provisions of this Privacy Policy, please do not use our Platform.

DinnerGift ("we" or "us") provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of Personal Data we receive from Users of the Platform. This Privacy Policy applies to all Personal Data that is provided to us through the Platform.

## What information do we collect?

DinnerGift collects and processes two types of information: (i) information Users provide to us, and (ii) information relating to the User's use of the Platform (collectively the "Personal Data")

## 1. Information you provide to us:

**Account:** When you sign up to the Platform and create an Account, fill out your public profile, order a culinary gift voucher, offer a culinary gift voucher, send us an email or communicate with our customer service, you are voluntarily providing us with certain individually identifiable information that we collect and process. Such personal information may include but is not limited to your name, physical address, email address, telephone number, billing information, bank account or Stripe details and other personal details like gender, age and other demographic information. By voluntarily giving us this personal information, you consent to such personal information being collected, used, disclosed, and stored by us, as described in our Terms and Conditions and our Privacy Policy.

After you've registered to the Platform and created your Account, we will collect additional information you may choose to provide to us on your Account, such as photos, descriptions, menus, contact details and your favorite Culinary Businesses. Providing additional information attracts Consumers to your creations and helps other Users to find you and get to know you. When you sell a culinary gift voucher, your Consumers may provide recommendations and reviews of your Culinary Business, which will be collected and processed by DinnerGift.

Additionally, we might collect necessary information from Culinary Businesses in order to complete all legally obligated paperwork in each country in which either the Culinary Business or where DinnerGift is active.

**Credit card details:** We may also ask for your credit card details if you submit an order in order to complete the payment of your order. Please note that we will not store your credit card details.

**Correspondence:** When you contact our customer service or anyone of the DinnerGift staff, we may keep a record of that correspondence and collect the necessary information to classify your question, respond to it and, if applicable, investigate any breach of our Terms and Conditions or this Privacy Policy. While we do not use this information for advertising, we may also use this information to identify and track potential problems and trends, and customize our Service to you.

## 2. Information we learn about you from your use of the Platform:

We may collect or process certain non-personal information or aggregated data about how and when you use the Platform. This information is usually of a technical nature (device settings and information, including but not limited to the type of browser, Operating System, keyboard language, screen resolution, IP address, location, etc.) and behavioral nature (the actions taken by you on the Platform, including but not limited to access times, pages requested, actions executed, etc.) and is used to compile statistical data about the Use of our Platform.

We may also collect additional information in connection with your participation in any promotions offered by us and information you provide when giving us feedback.

## Purposes of collecting information

DinnerGift only collects the Personal Data for the following purposes:

1. We require certain Personal Data to allow us to process your culinary gift voucher orders and offerings on our Platform.
2. Beyond the collection of your Personal Data to provide the Service as a marketplace between Culinary Businesses and Consumers, we may collect and use your Personal Data to:
  - **Improve user experience**

Tracking your use of the Platform will allow us to personalize our Service to your needs and process uploaded data related to your profile and culinary gift vouchers, incoming orders and payments. It will allow you to correctly use the Platform and publish the information intended to be made public by you, in accordance with your settings. This will also allow us to learn more about User preferences and general trends on the Platform in order to improve the quality of the Platform and personalize your experience.
  - **Provide customer service**

We will perform general customer administration of your Account by providing you with specific information and services available only to registered Users, sending you communications about the Platform (e.g. upcoming changes or improvements) as well as our other products and services and/or Culinary Businesses and respond to your questions, treat your requests or troubleshoot any problems.

- **Perform marketing actions**

Statistical or anonymous visitor information about our Users and the Use of our Platform can be disclosed to third parties for marketing, advertising and promotional purposes. We generate anonymous statistics about the (use and Users of the) Platform in order to improve the Platform or convey statistical information to third parties. We can also contact you with tailored suggestions and information about events and other products or services.

You can choose to opt-out of marketing promotions from DinnerGift and/or third parties and/or mail/email correspondence from DinnerGift if you do not want that your Personal Data is used for any of the aforementioned purposes. If you do not want to receive commercial communications from us, you can choose to unsubscribe from such commercial communications at any time.

- **Comply with legal and ethical requirements**

We may verify the compliance with your obligations set out in our Terms and our Privacy Policy and investigate fraud and infringements on all applicable rules and regulations.

3. We will ask for your consent before using any Personal Data for a purpose other than those that are set out in this Privacy Policy. As mentioned above, you can object at any time to the use of your Personal Data for direct marketing purposes free of charge.

## **Disclosure to third parties**

1. **To payment parties:** DinnerGift transfers certain Personal Data, which includes information about your method of payment and order, to the credit or debit card company that issued the credit card used for your order. DinnerGift would like to make you aware that these sites may have different security and privacy policies and that we have no control over and take no responsibility for any information contained in these sites. DinnerGift will never share these Personal Data with other parties.
2. **For legal purposes:** We may also disclose or provide access to your Personal Data in order to comply with the law or in case of illegal use, when we receive orders from legal authorities, to enforce our Terms and Conditions and other policies, and to protect the rights, property and safety of our Users, us or others.
3. **To trusted third parties:** Third parties can access all information intended to be made public by you on your Profile and the page of your Culinary Business. Such information may contain Personal Information. We do not sell, trade, or otherwise transfer your Personal Data to any third party, unless you give your explicit permission. This does not include trusted third parties who assist us in operating the Platform, conducting our

business or servicing you (related to e.g. the login system Auth0), so long as those parties agree to keep this information confidential and to process such information solely in accordance with the purposes set forth herein.

4. **Third Party Websites:** While using the Platform you may encounter links to third party websites. Please note that such third party websites are not related to the Platform, and we assume no responsibility or liability whatsoever with regard to privacy matters or any other legal matter with respect to such third party websites. We encourage you to carefully read the privacy policies and the terms and conditions of such websites.

## Security of your Personal Data

1. In order to prevent the loss, misuse and alteration of your Personal Data on the Platform, we have implemented a variety of appropriate technical and organizational security measures conform with or exceeding industry standard technologies, in order to safeguard the confidentiality of your Personal Data and ensure your online safety. However, we cannot guarantee that unauthorized access will never occur.
2. You may not disclose to or share with any third parties your login details. Keeping your login details confidential and safe is your sole responsibility. If your password has been revealed or stolen, immediately inform us and report any privacy breach or abuse of login data by sending us an email at [support@dinnergift.be](mailto:support@dinnergift.be).

## Modification and deletion of information

We do not process your Personal Data any longer than is necessary for the purposes set forth in this Privacy Policy. However, we do store your Personal Data as long as your Account is active or when the processing of your Personal Data is necessary to allow you to make use of our Platform.

Access to and modification or deletion of your Personal Data is free of charge. You may review, update, modify or delete your Personal Data at any time. Please promptly update your Personal Data if it changes. If you wish to delete your Account, you can send us an email at [support@dinnergift.be](mailto:support@dinnergift.be) and we will process your request according to our Terms and Conditions. Personal Data added by you will be stored for six (6) months after you delete such Personal Data or delete your entire Account. Please note that any of the Culinary Business reviews and User Generated Content you posted on the Platform will remain publicly viewable on the Platform after deletion of your Account.

## **Storage of Personal Data**

We shall store your Personal Data on our servers located in the European Economic Area. This means your Personal Data may be processed on a server located outside the country where you live but within the European Economic Area. By registering your Account on the Platform, you acknowledge and agree that the Personal Data that you provide, including sensitive personal information, may be transferred within the European Economic Area.

## **Modification of this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. Any changes to the Privacy Policy will be published on the Platform, so please consult this Privacy Policy frequently. In case of significant changes to the Policy that results in DinnerGift using your Personal Data in a manner materially different from that stated at the time of the collection, we will provide you with a notice on the Platform and/or send you an email notification. Changes to this Privacy Policy are effective as of the stated date of last revision. By continuing to use the Platform after the latest update date, you explicitly state that you have read, understand, accept and agree to the changes in the Privacy Policy. If you don't agree with the changes to the Privacy Policy, you may not further use the Platform.

## **Cookies**

Cookies are small pieces of information that are stored by your browser on your computer's or mobile device's hard drive. They enable DinnerGift to provide features such as remembering aspects of your last search to make subsequent searches faster. Cookies can be deleted from your hard drive if you wish. Most web browsers automatically accept cookies, but you can change your browser settings to prevent that. Even without a cookie you can use most of the features on the website. Our cookies do not contain any personally identifying information relating to you.

## **Questions**

If you have any further questions about our Privacy Policy or its implementation, please contact [support@dinnergift.com](mailto:support@dinnergift.com).

Date of last revision: March 14, 2018.