

Last Updated: July 15, 2024

We at From the Restaurant, S.L., and/or its affiliates (“FTR,” “we,” “us,” or “our”) have created this privacy policy (this “Privacy Policy”) because we know that you care about how information you provide to us is used and shared.

Who is responsible for the processing of your personal data?

Identity: From the Restaurant, S.L.  
Registered office: c/o Regus Maria de Molina, 8th floor Maria de Molina 39, Madrid, Comunidad de Madrid, 28006, Spain  
C.I.F. no.:   
VAT no:   
Email: support@parallevarya.com

We wish to ensure compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (the “General Data Protection Regulation” or “GDPR”) (OJEU L 119/1, 04-05-2016), and Spanish personal data protection regulations. This Privacy Policy therefore relates to the information collection and use practices of FTR in connection with your use of our website features and services when you visit or use {url} or FTR applications for mobile devices (collectively the “Sites”). By visiting and/or using the Sites, you are agreeing to the terms of this Privacy Policy.

When you provide us with any Personal Data (as defined below), you consent to FTR’s collection, use, disclosure, and retention of your information in accordance with this Privacy Policy and as otherwise permitted by law.

## WHAT DATA DO WE COLLECT AND HOW DO WE COLLECT IT?

### 1. PERSONAL DATA

FTR provides services and technology solutions to enable restaurants to process online orders for delivery or take away. Therefore, when you use the Sites to submit an order you will be required to provide us with Personal Data about yourself, such as your name, address (for delivery orders), phone number, and e-mail address (collectively, the “Personal Data”) for purposes of processing such orders. We do not collect any Personal Data from you when you use our Sites unless you provide us with the Personal Data voluntarily (for example, by placing an online order). To enjoy certain services offered on the Sites, it is mandatory to provide Personal Data. Not providing the requested data or not accepting this Privacy Policy means that you will not be able to participate in receiving such services.

### 2. BILLING INFORMATION

In order to submit orders through Sites, you will be required to provide certain information to our credit card processing partner, Stripe, in addition to the Personal Data noted above. Such information may include a debit card number, credit card number, billing address, and similar information (collectively, the “Billing Information”).

### 3. OTHER INFORMATION

In addition to the Personal Data, and the Billing Information and we may collect additional information (collectively, the “Other Information”). Such Other Information may include:

From You. Additional information about yourself that you voluntarily provide to us, such as your food orders.

From Your Activity. Information that we automatically collect when you use the Sites, such as the device from which you access the Sites, your IP addresses, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Sites you visit, what you order and from which restaurants, and similar information concerning your use of the Sites.

From Cookies. Information that we collect using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s hard drive so that your computer will “remember” information about your visit. We use cookies to help us collect Other Information and to enhance your experience using the Sites. If you do not want the Sites to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your internet browser’s documentation for information on how to do this. However, if you decide not to accept cookies from us, such website or application may not function properly.

For more information on cookies, please see our cookie policy {url}

## ACCESSING AND MODIFYING PERSONAL DATA AND COMMUNICATION PREFERENCES

If you have created an account on the Sites to place an online order, you may access, review, and make changes to your Personal Data and certain Other Information by following the instructions found on the Sites. You cannot opt out of receiving transactional e-mails related to the orders you place using the Sites. You can, however, opt-out of marketing emails and we will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases. In such case, we will provide you the reason why the modification or removal was not possible if you inquire through e-mailing support@parallevarya.com

## HOW WE USE AND SHARE INFORMATION

We use the Personal Data and the Other Information to provide you access to and use of the Sites, inform you about promotional programs, and to improve our service to you. We do not use your Personal Data for automated decision-making or profiling purposes. We use the Billing Information to process your orders. We do not save your credit card information in our system. We may share Personal Data, Billing Information, and/or Other Information as described below.

To provide you our services, we need to share your name, phone number, email address, meal order, customer ID, and delivery address with the restaurants from which you order and with any third parties that are involved in, or provide services in connection with, such orders, such as delivery services (e.g., Uber B.V.), credit card processors, licensees of the Sites, and similar parties. Such parties will use such information in accordance with the terms of their privacy policies. However, we will not sell your data to third parties for marketing purposes.

To administer rewards and promotional programs, we may share your Personal Data and Other Information with the restaurants from which you order and delivery services that deliver your orders.

We seek to ensure the security of Personal Data when sent outside our company and require that third-party service providers agree to respect confidentiality and take measures to protect personal data as required by data privacy regulations.

In an ongoing effort to better understand our users and our Sites, we might analyze the Other Information in aggregate form to operate, maintain, manage, and improve the Sites. This aggregate information does not identify you personally. We may share this aggregate data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics to describe our products and services to current and prospective business partners and to other third parties for other lawful purposes.

We may employ other companies and individuals to perform functions on our behalf. Examples may include providing marketing assistance, order fulfillment, billing, and customer service. These other companies will have access to the Personal Data, the Billing Information, and the Other Information only as necessary to perform their functions and to the extent permitted by law.

As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Personal Data, Billing Information, and Other Information may be part of the transferred assets.

To the extent permitted by law, we may also disclose Personal Data, the Billing Information, and the Other Information when required by law, court order, or other government or law enforcement authority or regulatory agency, or whenever we believe that disclosing such information is necessary or advisable, for example, to protect the rights, property, or safety of FTR or others.

We will take reasonable measures to require that the party receiving any of your Personal Data undertakes to: (i) retain and use such information only for the purposes set out in this Privacy Policy; (ii) not disclose your Personal Data except with your consent, as permitted by law, or as permitted by this Privacy Policy; and (iii) generally protect the privacy of your Personal Data.

## HOW WE PROTECT AND STORE YOUR DATA

We take commercially reasonable steps to protect the Personal Data, the Billing Information, and the Other Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. FTR securely stores Personal Data at third-party hosting facilities within the European Economic Area (“EEA”) that are market leaders who adhere to best practices for security on the premises and virtually. You acknowledge that we may transfer Personal Data outside the EEA in performance of the Services; however, Personal Data will continue to be stored in the EEA. Unless transferred on the basis of an adequacy decision issued by the applicable national authority, or as otherwise allowed under data protection regulations, all transfers of Personal Data out of the EEA shall be governed by standard contractual clauses. We will abide by the requirements of European data protection laws regarding the collection, use, transfer, retention, and other processing of Personal Data from the EEA.

Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to and from us over the internet. In particular, e-mail sent to or from the Sites or to our support email may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

The processing of data will continue for the time necessary to fulfill the purpose of its collection, as well as for compliance with the legal obligations arising from such processing. In general, if you create an

account, your Personal Data will be maintained as long as the account is active so that we can continue to provide services to you. In the event the account becomes inactive and no orders are placed for a period of one year, the Personal Data will thereafter be deleted following the expiration of the time period for consumer disputes. If no account is created, the Personal Data will be deleted following the expiration of the time period for consumer disputes. Personal Data may be held longer if we reasonably anticipate needing it for a legitimate business purpose, such as responding to a customer dispute.

## CHILDREN

We do not knowingly collect Personal Data from children under the age of 13. If you are under 13, please do not give us any Personal Data. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce our Privacy Policy by instructing their children to never provide us Personal Data without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to us, please contact us, and we will endeavor to delete that information from our databases.

## EXTERNAL WEBSITES, GOOGLE WALLET, AND APPLE PAY

The Sites may contain links to third-party websites. FTR has no control over the privacy practices or the content of any of our business partners or other websites to which we provide links. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites. Please be advised that your use of Google Wallet or Apple Pay is subject to the terms and conditions, including the privacy policies, of Google and Apple, respectively.

### **What are your data protection rights?**

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**The right to access** – You have the right to request copies of your personal data. We may charge you a small fee for this service.

**The right to rectification** – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request we complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that we erase your personal data, under certain conditions.

**The right to restrict processing** – You have the right to request that we restrict the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to our processing of your personal data, under certain conditions.

**The right to data portability** – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

In some cases, your request may be rejected if you request that data necessary to comply with legal obligations be deleted. If you make a request, we have one month to respond to you.

If you believe that your rights have been neglected by our organisation, you can file a complaint with the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).

If you would like to exercise any of these rights, please contact us at our email: [support@parallevarya.com](mailto:support@parallevarya.com)

Or write to us: c/o Regus Maria de Molina, 8th floor Maria de Molina 39, Madrid, Comunidad de Madrid, 28006, Spain

Online litigation. In accordance with the provisions of Art. 14.1 of Regulation (EU) 524/2013, the following electronic link to the online dispute resolution Sites is made available to consumers: <http://ec.europa.eu/consumers/odr/>

#### CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time, and may notify you of such changes (*e.g.*, posting any changes on the Sites, e-mailing you, or prompting you via a popup). By accessing the website and/or the Sites after we notify you of such changes to this Privacy Policy, you are deemed to have accepted such changes. Please refer back to this Privacy Policy on a regular basis.