

## Privacy Policy

Franco Manca 2 UK LTD. ("**Company**", "**us**", "**our**" or "**we**") respects your privacy and works hard to protect your personal information. We want you to understand what information we collect, how we may collect, store, use and protect any personal information, and under what circumstances we may disclose it.

This privacy policy ("**Privacy Policy**") applies to the way we use your personal information related to our provision to you of wireless internet access ("**WIFI Access**") and any related "**Services**" together with any software, data, information or other material contained in or accessible via the WIFI Access and the Services (collectively "**The Franco Manca System**").

By browsing, accessing and/or using any part of The Franco Manca System, you agree to be bound by this Privacy Policy. Please note, this Privacy Policy does not apply to information we collect by means other than your use of The Franco Manca System (including offline) or from other sources.

### 1.1. The Information We Collect

1.1.1. Personal Information. When you register for your **WIFI Access** Account and/or use The Franco Manca System, we collect personally identifiable information about you, ONLY if you voluntarily choose to provide it yourself. Such information may include (for example) your: name, E-mail address, area of interest, address, phone number, date of birth, location and any other related information, potentially including information relating to your dining/browsing preferences, e.g. the items purchased at certain business, average purchase price, favourite items (including per certain Merchant) and other identifiable information relating to your shopping preferences ("**Personal Information**").

1.1.2. Anonymous Information. When you use The Franco Manca System, we may gather anonymous information such as your account transactions, device location, and sometimes information about your computer or access device. This information does not personally identify you but may be helpful for us to improve The Franco Manca System ("**Anonymous Information**").

### 1.2. How We Collect the Information

1.2.1. Cookies. It is important for us to track how our **WIFI Access** is used, and we (or our service providers) may place "cookies" on your computer or device. Cookies are small data files that identify you when you use The Franco Manca System. You have the option to decline our cookies by using your browsers settings tools, but this may interfere with your use of The Franco Manca System.

1.2.2. Log File Information. Log file information is automatically reported by your browser each time you access a web page. When you register with or use our **WIFI Access**, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed, and other such Information.

1.3. How We Use the Information. Any of the information we collect from you may be used in one of the following ways:

1.3.1. We may use non-personally identifiable information of you in order to improve the quality of The Franco Manca System and customize your user experience.

1.3.2. We may use certain information about you, without identifying you as an individual to third parties, for purposes such as analysing how The Franco Manca System is used, diagnosing service or technical problems, maintaining security, and personalizing content.

1.3.3. We use cookies and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you use the **WIFI Access**; (b)

provide custom, personalized content and information; (c) monitor the effectiveness of The Franco Manca System; (d) monitor aggregate metrics such as total number of visitors and traffic; (e) diagnose or fix technology problems reported by our users or engineers that are associated with certain IP addresses; and (f) help you efficiently access your information after you sign in.

1.3.4. Personal Information collected may be used to provide users with further information and updates with regards to The Franco Manca System, as well as sending you marketing messages relating to Franco Manca that may be of interest to you. We may do this electronically, for example by email or text or by telephone or by post. You may tell us at any time if you do not wish to receive marketing message from us by contacting us at [askus@francomanca.co.uk](mailto:askus@francomanca.co.uk) or by following any instructions we may include in the message we send to you. For example, a STOP or unsubscribe message will appear at the foot of marketing text or email messages we send to you.

1.3.5. In the event that a user adheres to the terms of use of any specific Customer Club or Customer Loyalty Program or Gift Card Program by a Merchant, then it shall be deemed an approval to share such user's Personal Information gathered by Franco Manca with a Merchant running such a Customer Club or Customer Loyalty Program or Gift Card Program.

#### 1.4. Sharing Personal Information

1.4.1. We may share your Personal Information with the following:

1. other companies within our group and our relationship partners;
2. companies and organisations who provide a service to us or are acting as our agents (including their sub-contractors), on the understanding that they will keep the information confidential;
3. companies and organisations that assist us in processing transactions made via The Franco Manca System (including but not limited to payment processing service providers); Merchants, if compliant with applicable data protection laws and only with information relating to the purchases conducted by you from such Merchants;
4. anyone to whom we transfer or may transfer our rights and duties under this agreement;
5. any third party as a result of any restructure, sale or acquisition of any company within The Franco Manca System, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us.
6. Law enforcement authorities or government representatives who may require us to share information in order to comply with court order and other legal mandates, or when we believe that disclosure is necessary to report suspicious activities, prevent physical harm, financial loss, or violations of our agreements and policies.
7. Other third parties, subject to your prior consent or direction.

1.4.2. If we transfer your information in accordance with Section 1.4.1 above to a person, office, branch or organization located in another country, we will make sure that they agree to apply the same levels of protection as we are required to apply to your information and, where appropriate, to use your information strictly in accordance with our instructions.

1.4.3. Except as otherwise described in this Privacy Policy, Company will not disclose Personal Information to any third party unless required to do so by law or if we believe that such action is necessary to (a) conform to the law, comply with legal process served on us or our affiliates, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) to enforce our Agreement, take precautions against liability, to investigate and defend ourselves against any third-party claims or allegations, to assist

government enforcement agencies, or to protect the security or integrity of our **WIFI Access**; and (c) to exercise or protect the rights, property, or personal safety of the Company, our users or others.

1.4.4. If false or inaccurate information is provided or fraud is suspected, details may be passed to fraud prevention and credit reference agencies. Law enforcement agencies may access and use this information. The information recorded by fraud prevention agencies may be accessed and used by organizations in the UK, the US and in other countries.

1.4.5. We will retain information about you after your registration for The Franco Manca System is cancelled, or if your application is declined or abandoned, for as long as permitted for legal, regulatory, fraud and other financial crime prevention and legitimate business purposes.

1.5. Compromise of Personal Information. In the event that personal information is compromised as a result of a breach of security, the Company will promptly notify those persons whose personal information has been compromised, by email notice, or as otherwise required by applicable law.

1.6. Your Choices About Your Information.

1.6.1. You may, of course, decline to submit personally identifiable information through The Franco Manca System, in which case the Company may not be able to provide certain services to you. You may update or correct your Account information at any time by logging in to your Account.

1.6.2. The Data Protection Act gives You the right to see any of your personal information that we hold about you, except for: information that identifies people other than you, unless they give their consent; and/or information that could lead to the risk of serious harm to you or serious crime. If you would like to be given a copy of the personal information that is held about yourself, You can make a 'subject access request' by applying to us in writing to the following email address: [askus@francoманca.co.uk](mailto:askus@francoманca.co.uk) together with proof of your identity. We may charge you for £10 for providing you with copies of your information to you, as set out in the Data Protection Act 1998 to cover the Company's handling costs.

1.7. Changes To Our Privacy Policy. We may change this Privacy Policy at any time. We will post notifications of revised versions of our Privacy Policy on our Website, and revised policies will be immediately effective.

This Privacy Policy was most recently updated on the 09 April, 2018

Franco Manca 2 UK limited, company number 07045067, registered at 1st Floor, 50-51 Berwick Street, London, England, W1F 8SJ