

Privacy Policy

THIS PRIVACY POLICY IS IN ADDITION TO AND IS INCORPORATED INTO THE TERMS OF USE (THE "TERMS"). IT REFERS TO COMPANY AND USERS (AS SUCH TERMS ARE DEFINED IN THE TERMS).

1. General

- 1.1. All terms in capital letters not otherwise defined herein, shall have the meaning ascribed to them in the Terms as they appear in [\[link\]](#).
- 1.2. This Privacy Policy sets forth our policy and practices with respect to personal information that will be processed by us in relation to Your access and use of the Application. Any information that does not constitute personal data, is out of the scope of this Privacy Policy.

2. Personal Data that we collect and Process ("Personal Data")

- 2.1. We might collect, receive, use and process Personal Data that:
 - 2.1.1. You voluntarily provide; and/or
 - 2.1.2. We collect through Your use of the Application; and/or
 - 2.1.3. We receive in connection with any consumer issues that also relate to our operation of the Application (such as customer support); and/or
 - 2.1.4. We receive from other third parties.

3. The Types of Information that we might collect, receive, use and process:

- 3.1. Contact Information and Identification Information: first and last name; email address; telephone number; address, social networks' user details.
- 3.2. Demographic Information: location, age, date of birth.
- 3.3. Data you upload to the Application: photos, free text, including contact information.
- 3.4. Application Use Data: software version, mobile device type, operating system version, Account creation date, User activity level, interaction with Application features and satisfaction survey.
- 3.5. Support Interaction Data.
- 3.6. At no time shall Personal Data collected from You in accordance with this Privacy Policy or any information or materials derived from such Personal Data be deemed to be an electronic health record or an electronic medical record for any purpose whatsoever under any law or regulation.

4. The Purposes for which we use Your Personal Data.

- 4.1. **Provision of the Application's services and use and access thereto:** Your Personal Data as described above is used by us for (i) allowing You access to the Application (ii) provision of the services of the Application as intended. This is based on our contract with You as stipulated in the Terms.

- 4.2. **Certain Purpose:** If You provide Personal Data for a certain purpose, we may use the Personal Data in connection with that purpose for which it was provided. For instance, if You contact us by e-mail, we will use the Personal Data You provide to answer Your question or resolve Your problem and will respond to the email address from which the contact came. This is based on Your consent and on our obligations under the Terms.
- 4.3. **Internal-Business Purpose:** We may use Your Personal Data for internal business purposes, including without limitation, to help us improve the content and functionality of the Application, to better understand our Users, to protect against, identify or address wrongdoing or fraud, to enforce our Terms and this Privacy Policy, to manage Your Account and registration and provide You with customer service and support, and to generally manage the Application, our services and our business. This is based on our legitimate interests, and our contractual obligations set forth in the Terms.
- 4.4. We also anonymize and aggregate Personal Data (so that it does not identify You) and use it for purposes including testing our IT systems, statistical purposes and research and data analysis.
- 4.5. **Security and Dispute Resolution:** We may use Personal Data to protect the security of the Application, to detect and prevent fraud, fishing, identity theft, data leakage, to confirm the validity of software licenses, to resolve disputes and enforce our agreements. This is based on our legitimate interest, and our contractual obligations as set forth in the Terms, as applicable.
- 4.6. **Data Retention, Archives:** In the interests of the User, we retain and archive Personal Data as long as it necessary to obtain our services, meet with contractual obligations, laws and regulations and subject to our retention policies and this Privacy Policy.
- 4.7. **Transfer/Share/Disclose Data:** We will not Transfer/Share/Disclose any Personal Data unless it is necessary to perform our services to You and on “need to know basis”. Therefore, we may share Your Personal Data with our affiliates, contractors and service providers who process Personal Data on our behalf to perform the services of the Application, its performance and certain business-related functions. While we do so we make sure that they will be bound to maintain that Personal Data in accordance with this Privacy Policy.
- 4.8. **Other Purposes:** If we intend to use any Personal Data in any manner that is not consistent with this Privacy Policy, You will be informed of such anticipated use prior to or at the time the Personal Data is collected, used or processed, unless such other purposes are related to the purposes above.

5. Use of Cookies

- 5.1. We use “Cookies” (whether of Company or of third parties) to help You personalize Your online experience. A Cookie is a text file that is placed on Your hard disk by a web page server. Cookies are uniquely assigned to You and can only be read by a web server in the domain that issued the Cookie to You.
- 5.2. One of the primary purposes of Cookies is to provide a convenience feature to save You time. The purpose of a Cookie is to tell the web server that You have returned to a specific page. For example, if You personalize Your Account pages, or register to the Application and/or to a specific service, a Cookie helps us to recall Your specific

information on subsequent visits. This simplifies the process of recording Your Personal Data, such as IP addresses, username and so on. When You return to the Application, the information You previously provided can be retrieved, so You can easily use the Application features that You customized.

- 5.3. You have the ability to accept or decline Cookies. Most web browsers automatically accept Cookies, but You can usually modify Your browser setting to decline Cookies if You prefer. If You choose to decline Cookies, You may not be able to fully experience the interactive features of the services provided in the Application or other websites You visit.

6. With Whom We Share Your Personal Data

- 6.1. No Sale to Third Parties. We do not, and will not, sell any of your personal data to any third party for advertising, marketing or any other purpose – including your name, address, email address or credit card information. We want to earn and maintain your trust, and we believe this is absolutely essential in order do that.
- 6.2. For data storage and cloud services, the Personal Data collected by us is stored at Amazon Web Services in Virginia, USA.
- 6.3. for providence of the food ordering services as intended some of your Personal Information, such as contact details will be transferred to the Restaurants.
- 6.4. We keep and transfer only the minimum data that is necessary for conducting our services. Please be aware that in order to deliver the Application services, data may be transferred by us and processed by our third parties service providers of the following categories: email exchange servers services and SMS providers, authentication, payments processors, artificial intelligence services, analytical services and storage of data (“Suppliers”). Our Suppliers do not have any right to use, your personal information collected from our Services beyond what is necessary for the purpose of facilitating our provision of the Application and Services.
- 6.5. We may disclose Your Personal Data if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency (including in response to public authorities to meet national security or law enforcement requirements), or in the good faith belief that such action is necessary to (a) comply with a legal obligation, (b) protect or defend our rights, interests or property or that of third parties, (c) prevent or investigate possible wrongdoing in connection with the Application, (d) act in urgent circumstances to protect the personal safety of Users of the Application or the public, or (e) protect against legal liability.
- 6.6. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets. You acknowledge and agree that any successor to or acquirer of Company (or its assets) will continue to have the right to use Your Personal Data and other information in accordance with the terms of this Privacy Policy.

7. Transfer of Your Personal Data

- 7.1. Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the Suppliers and Restaurants involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country, or other governmental jurisdiction where the data protection laws may differ than those in Your jurisdiction.
- 7.2. Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.
- 7.3. The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

8. Your rights in relation to Your Personal Data

- 8.1. **Right of Access, Correcting and Deleting:** in accordance with applicable laws and regulations, You have a right to request access to Your Personal Data that we process. You also have the right to request to correct or rectify any inaccurate Personal Data that we process about You, or delete it, depending on the circumstances, all subject to applicable laws and regulations, and our internal processes and procedures for complying with such requests.
- 8.2. Our Application enables You to view and edit Your Personal Data independently whenever You wish to do so. You may request the deletion of Your Personal Data by submitting a written request to us through [[Hello@encourse.com](mailto>Hello@encourse.com)]. Please note however, that deleting information from the Application or otherwise through submitting a request to us, may have detrimental effect on Your ability to use the Application or on the performance of the Application, and any such effects and results are at Your own risk and liability. Certain information, if deleted, will effectively constitute deletion of Your Account and termination of Your subscription.
- 8.3. Please note that unsubscribing from the Application does not delete Your information.

9. Security of Personal Data

- 9.1. We are committed to protecting the security of any Personal Data on our database and network. We use a variety of security technologies and procedures to help protect all Personal Data from loss, misuse, unauthorized use, access, inadvertent disclosure, alteration and destruction. However, no network, server, database or internet or e-mail transmission is ever fully secure or error free. Therefore, You should take special care in deciding what information You disclose.

10. Links to Other Websites

- 10.1. This Privacy Policy applies only to the Application. The Application may contain links to other websites not operated or controlled by Company (the “**Third Party Sites**”). The policies and procedures we described here do not apply to the Third-Party Sites. The

links from the Application do not imply that Company endorses or has reviewed the Third-Party Sites. We suggest contacting those sites directly for information on their privacy policies.

11. Changes to This Privacy Policy

- 11.1. We may change this Privacy Policy from time to time, to reflect how We are processing Your data, including following any regulatory changes or our internal policies.
- 11.2. If We make significant changes, we will make that clear on the Application or by some other means of contact such as email, so that you are able to review the changes before you continue to use Application.

12. **Contact information**. If You have a complaint about our privacy practices, You should write to us at [[Hello@encourse.com](mailto>Hello@encourse.com)]. We will take reasonable steps to work with You to attempt to resolve Your complaint.