

## Hotspot Privacy Policy

Last Updated and Effective as of: **January 15<sup>th</sup>, 2024**

HOTSPOT LLC (“Company,” “we,” “our,” or “us”) understands that privacy is important to our users. Protecting your private information is our priority. This Privacy Policy discloses our practices regarding information collection and usage for [www.togohotspot.com](http://www.togohotspot.com) (the “Website”); the Hotspot Delivery App and Hotspot Delivery Driver App (the “App”); and any other websites, apps, communication platforms, text message services, phone and voice services, email services, or services we provide (collectively, our “Services”), unless another applicable privacy policy applies or is posted on that service.

### Overview:

Our Services match individual customers and service contractors (“Couriers”) that provide transportation and delivery of meals. To enable these Services, we collect and use certain information about our customers, Couriers, and other Website, App, communication platform, users (collectively, “users,” “you,” or “your”) that use or communicate with us regarding our Services:

- We collect Personal Information (as defined below) from users of our Services when it is voluntarily provided to us and use it for the purposes for which it was provided (see ***Information We Collect and How We Collect It***).
- We automatically collect information from users of our Services for analytical purposes (see ***Information We Collect and How We Collect It***).
- We will not use or share information we collect from you with anyone except as described in this Privacy Policy.

Please read this Privacy 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, you should not use the Services. By accessing or using the Services, you agree to this Privacy Policy.

Our Services are provided from the United States and all servers that make it available reside in the United States. You understand that data stored in the United States may be subject to lawful requests by the courts or law enforcement authorities in the United States. The Services are intended for users situated in the United States only. We do not currently offer goods and services to the European Economic Area or the United Kingdom.

If you have questions, you can always contact us using the information in the section below titled **Contact**.

### Information We Collect and How We Collect It:

We may collect information, including Personal Information, when you provide such information to us directly, such as when you send us texts, emails, or otherwise interact with us on the Services. Your provision of your Personal Information to us is completely voluntary. “Personal Information” is information that specifically identifies you.

Categories of Personal Information we collect directly from you include identity data (e.g., name or other similar identifiers), and contact data (e.g. email address, telephone number). We may also collect other

information that you directly provide us including marketing and communications data (e.g., your preferences in receiving marketing from us).

We do not directly collect your payment information. Rather, that information goes directly to a third party payment processor company. We only retain the last 4 digits of your payment method. Your payment and other information collected by the payment processor company shall be processed according to their privacy policy located at <https://stripe.com/privacy>.

We, our service providers, or our third-party partners may also automatically collect information from you when you visit our Website and use our Services through cookies and other tracking technologies. Such information does not directly identify you as an individual and may include:

- **Cookies and Similar Technology**

We may store some information on your device or device hard drive as a cookie or similar type of file (such as clear gifs, web beacons, tags, and similar technologies that work on mobile devices) to collect data related to usage of the Services. "Cookies" are pieces of information that may be placed on your computer by a website for the purpose of collecting data to facilitate and enhance your communication and interaction with that website. Such data may include, without limitation, the address of the websites you visited before and after you visited the Website, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Website you visit and what links you clicked on, the region where your device is located, and geo-IP data. We may use cookies to customize your use of the Services and for other purposes to make your use of the Services more convenient or to enable us to enhance our Services.

## **How We Use Your Information**

We may use Personal Information and other information as described herein including for the following purposes:

- To contact you about and provide you and our clients with our Services;
- To create, maintain, customize, and secure your account with us, and to personalize your experience on the Services;
- To operate the Services and to provide you with any specific services that you have requested;
- To deliver content and product and service offerings relevant to your interests;
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and fulfillment;
- To respond to law enforcement requests and as required by applicable law, court order, legal process, or governmental regulation;
- To help maintain the safety, security, and integrity of our Services, databases and other technology assets, and business;
- For internal research; for technological development and demonstration; and to improve, upgrade, or enhance our Services;
- For detecting security incidents; protecting against malicious, deceptive, fraudulent, or illegal activity; and prosecuting those responsible for that activity;
- To investigate suspected fraud, harassment, or other violations of any law, rule, or regulation, or the policies for the Services;
- In connection with a bankruptcy proceeding or the sale, merger, or change of control of the Company or the division responsible for the services with which your information is associated;

- To respond to your direct inquiries;
- To add you to our mailing lists and send you emails from time to time; and
- For any additional purposes that you specifically consent to.

We reserve the right to supplement your Personal Information with information we gather from other sources which may include information we gather from online and offline sources. We also reserve the right to use and disclose information that is not Personal Information in any manner permitted by law except as otherwise provided in this Privacy Policy. Finally, we may permit our vendors and subcontractors to access your Personal Information, but they are only permitted to do so in connection with performing services for us. They are not authorized by us to use the information for their own benefit.

As noted above, we may collect information that is not Personal Information (“Non-Personal Information”). We may aggregate or de-identify Personal Information so that the information does not personally identify you or anyone else, such as by using such information for driver verification. Because Non-Personal Information, including aggregate or de-identified information, does not personally identify you, we may collect, use and disclose Non-Personal Information for any purpose permitted by law. In some instances, we may combine Non-Personal Information with Personal Information. If we combine any Non-Personal Information with Personal Information, the combined information will be treated by us as Personal Information.

## **Security**

The security of your information is very important to us. We attempt to provide for the secure transmission of your information from your devices to our servers by utilizing encryption software. However, due to the inherent open nature of the Internet, we cannot guarantee that communications between you and the Company, or information stored on the Services or our servers, will be free from unauthorized access by third parties such as hackers, and your use of the Services demonstrates your assumption of this risk. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. Only those employees who need access to your information in order to perform their duties are authorized to have access to your Personal Information. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at [support@togohotspot.com](mailto:support@togohotspot.com).

## **Data Retention**

We will retain your information for as long as your account or inquiry is active or as needed to provide you with the Services and for a reasonable time thereafter in accordance with our standard procedures or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your information, we may continue to retain and use anonymous or aggregated data previously collected. Please note that we will not be liable for disclosures of your data due to errors or unauthorized acts of third parties.

## **Protection for Children**

Our Services are intended for users ages 18 and over. We do not knowingly collect Personal Information from minors. When we become aware that Personal Information (or other information that is protected under applicable law) from a child under 13 has been collected, we will use all reasonable efforts to delete

such information from our database. If you believe we might have any Personal Information from or about a child under 13, please contact us at [support@togohotspot.com](mailto:support@togohotspot.com).

### **Opt-Out**

To opt out of any future promotional messages from us, you should send an unsubscribe request to us at [support@togohotspot.com](mailto:support@togohotspot.com). We will process your request within a reasonable time after receipt. Please note that if you opt out in this manner, certain aspects of the Services may no longer be available to you.

If you want to stop or restrict the placement of cookies or flush any cookies that may already be on your computer or device, please refer to and adjust your web browser preferences. Further information on cookies is available at [www.allaboutcookies.org](http://www.allaboutcookies.org). By deleting our cookies or disabling future cookies, you may not be able to access certain areas or features of our Services, and some of the Services' functionality may be affected.

Please note that, unless required by law, we do not respond to or honor "Do Not Track" (a/k/a DNT) signals or similar mechanisms transmitted by web browsers.

### **Changes to policy:**

We reserve the right, at our discretion, to change, modify, add, or remove portions from this policy at any time, provided that any such modifications will only be applied prospectively. We encourage you to periodically review the Website and App for the latest information on our privacy practices. Your continued use of the Services following the posting of any changes to this policy means you accept such changes.

### **Contact:**

For questions or concerns relating to privacy, we can be contacted at: [support@togohotspot.com](mailto:support@togohotspot.com).