

## PRIVACY POLICY

*Last Modified: October 8, 2018*

### Introduction

Carob Mill Restaurants Ltd (hereinafter “**we**”, “**us**” or “**our**”) operates the website [www.carobmill-restaurants.com](http://www.carobmill-restaurants.com) (hereinafter the “**Website**”) and is the controller of the information collected or provided directly or via this Website.

We respect your privacy and are committed to protecting it through our compliance with applicable privacy and data protection laws and regulations. Please read this privacy policy carefully to understand our policies and practices regarding your information and how we will treat it. By using our Website, you are accepting the practices described in this privacy policy.

If you have any questions about our privacy practices, please refer to the end of this privacy policy for information on how to contact us.

This privacy policy applies to information we collect:

- on this Website,
- in e-mail, text and other communications between you and this Website,
- directly from you,
- through mobile and desktop applications you download from this Website, which provide dedicated non-browser-based interaction between you and this Website, or
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this privacy policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by us or any third party (including our affiliates and subsidiaries); or
- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

### Collection of Personal Information

We collect and use several types of information from and about users of our Website, including information by which you may be personally identified and that is defined as personal data or personally identifiable information under applicable law (“**Personal Information**”), such as your first and last name, e-mail address, billing information, IP addresses, demographics, passwords, telephone number, or other (online) contact information.

Categories of Personal Information we collect and use on or through our Website include:

- Information that you provide by filling in forms on our Website, in particular at the time of registering to use our Website, subscribing to our service, posting material, taking part in surveys for research purposes or requesting further services.
- We also collect Personal Information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- Details of transactions you carry out through our Website, if any, and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on our Website.
- In some cases, we also collect and store Personal Information about other people that you provide to us. Similarly, if you use our Website to upload, share or distribute content (including videos, comments or other submissions), and such content contains Personal Information about others, such information will be stored in order to allow for such uploading, sharing or distribution.
- When you access our Website from a mobile device like a tablet or phone, we receive information about your location, your device, including one or more unique identifiers for your device, and your mobile carrier. We use this information upon prior consent to provide you with location-based services, such as advertising, search results, and other personalized content. Most devices allow you to turn off location services.
- You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. Although, we may limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

### **Information Collected Through Automatic Data Collection Technologies**

As you navigate through and interact with our Website, we use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- details of your visits to our Website, including any form of aggregate data, navigational data, location data, click-stream data, or historical data, number of clicks and how you interact with links on the Website, domain

names, landing pages, pages viewed, referral data (e.g., the URL of the last page you visited prior to clicking through to the Website and the address of the exit page when you left our Website), log files and other communication data and the resources that you access and use on the Website; and

- information about your computer and internet connection, including your IP address, operating system and browser and platform type (e.g., a Firefox browser on a Macintosh platform) and language, access times, the content of any undeleted cookies that your browser previously accepted from us. We use this information to track how users are accessing and using the Website.

The information we collect automatically is statistical data and includes Personal Information, or we maintain it or associate it with Personal Information we collect in other ways or receive from third parties. Above information helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences, allowing us to customize our Website according to your individual interests;
- speed up your searches; and
- recognize you when you return to our Website.

We also use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** Cookies are small text files that are stored in your web browser or downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie, and allow a website to recognize a user's device.

We currently use the following types of cookies:

- *Cookies that are strictly necessary:* These are cookies that are required for the operation of our Website. These include, for example, cookies that enable a user to log into the members' area of our Website and to check if a user is allowed access to a particular service or content.
- *Analytical cookies:* These cookies allow us to recognize and count the number of users and to see how users use and explore our Website. These cookies help us to improve our Website, for example by ensuring that all users are able to find what they are looking for easily.

- *Functionality cookies:* We are always glad to see you back. This type of cookies allows us to recognize you when you return to our Website in order to greet you by name and to remember, for example, your choice of language.
  - *Targeting cookies:* These cookies record the visit of a user on our Website, the pages a user has visited and the links a user has followed in order to enable us to make our Website more relevant to the users' interests. In addition, these cookies are used to identify the websites and the marketing materials you are accessing our Website from in order to target content (for example, to automatically show you our Website according to your language settings).
  - We do not require that you accept cookies and you may withdraw your consent to our use of cookies at any time by adjusting your browser's privacy settings. However, if you decline to accept cookies, some functionality on our Website may be disabled and you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website. Cookies can be either session cookies or persistent cookies. A session cookie expires automatically when you close your browser. A persistent cookie will remain until it expires or you delete your cookies. Expiration dates are set in the cookies themselves; some may expire after a few minutes while others may expire after multiple year
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons.** Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also known as clear gifs, pixel tags, single-pixel gifs and web bugs) that are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies. Unlike cookies, which are stored on the user's computer hard drive, web beacons are embedded invisibly on the web pages (or in an email) and are about the size of the period at the end of this sentence. Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages or opened an e-mail, to understand usage patterns and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). We also may receive an anonymous identification number if you come to our site from an online advertisement displayed on a third-party website.

- **Device identifiers.** When you use a mobile device like a tablet or phone to access our Website, we may access, collect, monitor, store on your device, or remotely store one or more “device identifiers”. Device identifiers are small data files or similar data structures stored on or associated with your mobile device, which uniquely identify your mobile device. A device identifier may be data stored in connection with the device hardware, data stored in connection with the device’s operating system or other software, or data sent to the device by the Website. A device identifier may deliver information to us or to a third party partner about how you browse and use the Website and may help others or us provide reports or personalized content and ads. Some features of the Website may not function properly if use or availability of device identifiers is impaired or disabled.
- **Analytics and Advertising Tools.** We use third party analytics and advertising tools and technologies, in particular Google Analytics and DoubleClick provided by Google, Inc., USA (“Google”). These tools and technologies collect and analyze certain types of information, including IP addresses, device and software identifiers, referring and exit URLs, onsite behavior and usage information, feature use metrics and statistics, usage and purchase history, media access control address (MAC Address), mobile unique device identifiers, and other similar information via the use of cookies. The information generated by Google Analytics and DoubleClick about your use of the Website (including your IP address) may be transmitted to and stored by Google on servers in the United States.
- **AddThis.** On some pages of our Website, we are using plugins provided by the bookmark service AddThis LLC, USA (“AddThis”). If you access a page on our Website that contains such plugin, your browser automatically establishes a direct connection to servers of AddThis in the USA and AddThis receives the information that your browser has accessed the corresponding page on our Website and additional information, including your IP address. AddThis uses this information to generate anonymous user profiles, which serve as basis for personalized and behavioral advertising approach. More information can be found at <http://www.addthis.com/privacy/privacy-policy>. To learn how you can opt out from this information collection by AddThis see “Choices About How We Collect, Use and Disclose Your Personal Information” below.

### **Purposes for Which We Use Your Personal Information**

In general, we use information that we collect about you or that you provide to us, including Personal Information and Sensitive Personal Information, for following purposes:

- **Provision of services:** to present our Website and its contents to you, including any interactive features on our Website, and to provide you with information, products or services that you request from us; we also collect

and use Personal Information to verify your eligibility and deliver prizes in connection with contests and sweepstakes;

- **Customer management:** to manage your account, to provide you with customer support and with notices about your account or subscription, including expiration and renewal notices, and notices about changes to our Website or any products or services we offer or provide through it;
- **Customization of content:** to perform research and analysis about your use of, or interest in, our Website content, products, or services, or products, services in order to develop and display content and advertising tailored to your interests on our Website and other sites;
- **Advertising:** following explicit consent to communicate with you about products or services that may be of interest to you either from us, our affiliates or other third parties;
- **Analytics:** to determine whether users of the Website are unique, or whether the same user is using the Website on multiple occasions, and to monitor aggregate metrics such as total number of visitors, pages viewed, demographic patterns;
- **Functionality and security:** to diagnose or fix technology problems, and to detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement;
- **Compliance:** to enforce our terms and conditions and to comply with our legal obligations;
- in any other way we may describe when you provide the information; or for any other purpose with your consent provided separately from this privacy policy.

We use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

### **Disclosure of Your Personal Information**

We want you to understand when and to whom we disclose Personal Information and other information we have collected about you or your activities on the Website. We do not share your Personal Information with third parties except as indicated below:

- **Affiliates.** We share above categories of Personal Information with our subsidiaries and affiliates to the extent this is necessary for the purposes of provision of services, customer management, customization of content, advertising, analytics, verifications, functionality and security, and compliance, or to the extent you have provided your consent provided separately from this privacy policy..

- **Service providers.** To our authorized service providers that perform certain services on our behalf, including for purposes of provision of services, customer management, customization of content, advertising, analytics, verifications, functionality and security. These services may include fulfilling orders, processing credit card payments, risk and fraud detection and mitigation, providing customer service and marketing assistance, performing business and sales analysis, supporting our Website functionality, and supporting contests, sweepstakes, surveys and other features offered through our Website. These service providers may have access to Personal Information needed to perform their functions but are not permitted to share or use such information for any other purposes.
- **Legal successors.** To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about our Website users is among the assets transferred. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy policy.
- **Other.** To the extent this is necessary to fulfill any other purpose not mentioned above for which you provided Personal Information and, if applicable, your consent separately from this privacy policy.

We also disclose your Personal Information to other third parties, including official authorities, courts, or other public bodies:

- In response to a subpoena or similar investigative demand, a court order or other judicial or administrative order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; to comply with applicable law or cooperate with law enforcement, government or regulatory agencies; or to enforce our Website terms and conditions or other agreements or policies; or as otherwise required by law (including responding to any government or regulatory request). In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion.
- To the extent a disclosure is necessary in connection with efforts to investigate, prevent, report or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to maintain and protect the security and integrity of our Website or infrastructure.

Third parties to whom we may disclose Personal Information may have their own privacy policies which describe how they use and protect Personal Information. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. In particular, we may transfer non-Personal Information and process it outside your country of residence, wherever the Website, its affiliates and service providers operate. We may combine non-Personal Information we collect with additional non-Personal Information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis. For example, we may tell our advertisers the number of visitors to our Website and the most popular features or services accessed. This information does not contain any Personal Information and may be used to develop content and services that we hope you and other users will find of interest and to target content and advertising.

### **Financial Information**

Financial information (including Personal Information) that you have provided to us will only be shared with our third party processors in order to initiate and complete any orders placed on your account. All credit card transactions and such are processed with industry standard encryption through third party processors who only use your financial information and Personal Information for that purpose. All financial data and related Personal Information will not be shared by us with third parties except with your authorization or when necessary to carry out all and any transactions requested by you with the understanding that such transactions may be subject to rules, terms, conditions and policies of a third party. All such information provided to a third party is subject to their terms and conditions.

### **Third Party Login Functionality**

We may permit users with accounts on certain third party services, including but not limited to, social networking, search, sharing, and other services delivered by third parties, to bypass the standard applicable registration process. If you connect through an authorized third party service, you will be able to use your third party login information to log in to your account or access our content and Website. We are not responsible for the sharing, posting, commenting, or other content and information gathering practices of any third party services that may be triggered by using these third party login services. Please review their terms of service and privacy policies carefully before using third party login functionality to access our Website.

By using any third party services to log in to your account or access our Website, you permit us to collect, and use all information, including Personal Information, related to your third party account that may be accessible to us through the third party service, including through its application programming interface (API), pursuant to this privacy policy.

### **How We Store Your Personal Information**

The information that we collect about you, including Personal Information, will be stored and processed in Cyprus and in remote cases in the Countries in which we and the third parties mentioned above maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from European data protection laws, please note that in the course of providing you with the service you

requested we may transfer Personal Information to some of these countries and jurisdictions that have data protection laws that do not provide the exact same level of protection as in your jurisdiction, however we make every effort possible to verify and audit that the processor and sub processors provide the best level of protection of personal data.

### **Retention of Personal Information**

To the extent we have collected your Personal Data for purposes of provision of services, customer management, and customization of content (for descriptions of these purposes see above), we keep your Personal Information for as long as you have an account with the Website, as needed to provide you with our respective services and in compliance with relevant laws of Cyprus. For further information regarding specific retention period please contact us at [dine@carobmill-restaurants.com](mailto:dine@carobmill-restaurants.com) .

If you delete your account, or if your account is closed for any reason or visit our Website, we retain your information to the extent this should be necessary to comply with have legal, auditing or account obligations or it is in our archive system and cannot be separated from other information. Where possible, your Personal Information will be anonymized.

Personal Information used for functionality and security purposes will be stored as long as necessary to ensure the proper operation and the security of our Website and services, usually for a period of 6 months.

Personal Information used for analytics purposes will be stored as long as necessary to analyze the usage of our Website and services, usually for a period of 6 months.

Personal Information used for advertising purposes will be stored for a period of 12 months.

The period for which we keep your Personal Information that is necessary for compliance and legal enforcement purposes varies and depend on the nature of our legal obligations and claims in the individual case.

### **Legal Bases for Collection, Use and Disclosure of Your Personal Information**

There are different legal bases that we rely on to collect, use and disclose your Personal Information, namely:

- **Consent:** We will rely on your consent to use (i) technical information collected by automatic data collection technologies as described above; (ii) Personal Information that qualifies as Sensitive Personal Information for the purposes described above; (iii) your Personal Information for marketing and advertising purposes; (iv) your Personal Information for other purposes when we ask for your consent separately from this privacy policy.
- **Performance of contract:** The use of your Personal Information for purposes of providing the services, customer management and functionality and security as

described above is necessary to perform the services provided to you under our term and conditions and any other contract that you have with us.

- **Legitimate interests:** We use your Personal Information for our legitimate interests to customize the content on our Website and to analyze the use of our Website as described in this privacy policy.
- **Compliance with legal obligation:** We are permitted to use your Personal Information in to the extent this is required to comply with a legal obligation to which we are subject.

### **How We Protect the Security of Your Personal Information**

We take appropriate security measures (including physical, electronic and procedural measures) to safeguard your Personal Information from unauthorized access and disclosure. For example, only authorized employees are permitted to access Personal Information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of your Personal Information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your Personal Information.

The safety and security of your Personal Information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The Personal Information you share in public areas may be viewed by any user of the Website. Users should also take care with how they handle and disclose their Personal Information and should avoid sending Personal Information through insecure email. We are not responsible for circumventions of any privacy settings or security measures contained on the Website.

### **Choices About How We Collect, Use and Disclose Your Personal Information**

We strive to provide you with choices regarding the Personal Information you provide to us.

- You can choose not to provide us with certain Personal Information, but that may result in you being unable to use certain features of our Website because such information may be required in order for you to register as a member; purchase products or services; participate in a contest, promotion, survey, or sweepstakes; ask a question; or initiate other transactions on our Website.
- You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of the Website may then be inaccessible or not function properly.
- When you register on our Website, you may be given a choice as to whether you want to receive email messages, newsletters or advertising material about product updates, improvements, special offers, or

containing special distributions of content by us. If consent yet later on you decide you no longer want to receive commercial or promotional emails or newsletters from us, you will need to avail yourself of the unsubscribe mechanism set out in the applicable communication. It may take up to seven days for us to process an opt-out request. We may send you other types of transactional and relationship e-mail communications, such as service announcements, administrative notices, and surveys, without offering you the opportunity to opt out of receiving them as these will related directly to your relationship with us. Please note that opting out of receipt of promotional email communications will only affect future activities or communications from us. If we have already provided your information to a third party before you have changed your preferences or updated your information, you may have to change you preferences directly with that third party.

- If you submit Personal Information, you may delete your account with us at any time. If you delete your account, your Personal Information and any and all other account related information including, but not limited to, user profile data, sharing data and any other data, or content specifically associated with your account will no longer be accessible by you. After deleting your account, if you choose to have an account with us in the future, you will have to sign up for a new account as none of the information you previously provided or saved within your account will have been saved on the contrary they will be erased.
- You can disable the location services on your mobile device or tablet. Most likely, these controls are located in the device’s settings menu. If you have questions about how to disable your device’s location services, we recommend you contact your mobile service carrier or your device manufacturer.

### **Your Rights Related to Your Personal Information**

Subject to the provisions of the General Data Protection Regulation, you have certain rights regarding the Personal Information we collect, use or disclose and that is related to you, including the right

- to receive information on the Personal Information concerning we hold about you and how such Personal Information is used (right to access);
- to rectify inaccurate Personal Information concerning you (right to data rectification);
- to delete/erase your Personal Information (right to erasure/deletion, “right to be forgotten”);
- to receive the Personal Information provided by you in a structured, commonly used and machine-readable format and to transmit those Personal Information to another data controller (right to data portability)

- to object to the use of your Personal Information where such use is based on our legitimate interests or on public interests (right to object); and
- in some cases, to restrict our use of your Personal Information (right to restriction of processing).

If we ask for your consent to use your Personal Information, you can withdraw your consent at any time.

You may, at any time, send us an e-mail at [dine@carobmill-restaurants.com](mailto:dine@carobmill-restaurants.com) to exercise your above rights in accordance with the applicable legal requirements and limitations. If you are located in the European Economic Area, you have a right to lodge a complaint with your local data protection authority.

Note that some requests to delete certain Personal Information will require the deletion of your user account as the provision of user accounts are inextricable linked to the use of certain Personal Information (e.g., your e-mail address). Also note that it is possible that we require additional information from you in order to verify your authorization to make the request and to honor your request.

You can delete your User Contributions from the Website as specified in the “**Error! Reference source not found.**” section.

### **Changes to Our Privacy Policy**

We may modify or revise our privacy policy from time to time. Although we may attempt to notify you when major changes are made to this privacy policy, you are expected to periodically review the most up-to-date version found at our website [www.carobmill-restaurants.com](http://www.carobmill-restaurants.com) so you are aware of any changes, as they are binding on you.

If we change anything in our privacy policy, the date of change will be reflected in the “last modified date”. You agree that you will periodically review this privacy policy and refresh the page when doing so. You agree to note the date of the last revision to our privacy policy. If the “last modified” date is unchanged from the last time you reviewed our privacy policy, then it is unchanged. On the other hand, if the date has changed, then there have been changes, and you agree to re-review our privacy policy, and you agree to the new ones. By continuing to use the Website subsequent to us making available an amended version of our privacy policy in a way that you can easily take notice of it, you thereby consent to such amendment.

### **Enforcement; Cooperation**

We regularly review our compliance with this privacy policy. Please feel free to direct any questions or concerns regarding this privacy policy or our treatment of Personal Information by contacting us through this Website at [dine@carobmill-restaurants.com](mailto:dine@carobmill-restaurants.com) . When we receive a formal written complaint, it is our policy to contact the complaining party regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the collection, use and disclosure of Personal Information that cannot be resolved by an individual and us.

**No Rights of Third Parties**

This privacy policy does not create rights enforceable by third parties or require disclosure of any Personal Information relating to users of the Website.

**No Error Free Performance**

We do not guarantee error-free performance under this privacy policy. We will use reasonable efforts to comply with this privacy policy and will take prompt corrective action when we learn of any failure to comply with our privacy policy. We shall not be liable for any incidental, consequential or punitive damages relating to this privacy policy.

**Contact Information**

If you have any questions about this privacy policy or our information-handling practices, please contact us at [dine@carobmill-restaurants.com](mailto:dine@carobmill-restaurants.com) .

You may also contact us at Vasilissis Street, 3042, Limassol, Cyprus, PO Box 50203, 3602, Limassol, Cyprus telephone +357 25820430 .