

Effective Date: 05/05/2018

Applicable To The Following Mobile Application:

Grumbles

**Article 1 - DEFINITIONS:**

- a) **APPLICABLE MOBILE APPLICATION:** This Privacy Policy will refer to and be applicable to the Mobile Application listed above, which shall hereinafter be referred to as "Mobile Application."
- b) **EFFECTIVE DATE:** "Effective Date" means the date this Privacy Policy comes into force and effect.
- c) **PARTIES:** The parties to this privacy policy are the following owner: Peter Wolk ("Owner") and You, as the user of this Website. Hereinafter, the parties will individually be referred to as "Party" and collectively as "Parties."
- d) **OWNER:** Owner is the publisher, owner, and operator of the Mobile Application and is the Party responsible for the collection of information described herein. Owner shall be referred to either by Owner's name or "Owner," as listed above. If Owner or Owner's property shall be referred to through first-person pronouns, it shall be through the use of the following: Us, We, Our, Ours, etc.
- e) **YOU:** Should You agree to this Privacy Policy and continue Your use of the Mobile Application, You will be referred to herein as either You, the User, or if any second-person pronouns are required and applicable, such pronouns as "Your", "Yours", etc.
- f) **PERSONAL INFORMATION:** "Personal Information" means information that we obtain from You in connection with Your use of the Mobile Application.

**Article 2 - GENERAL INFORMATION:**

This privacy policy (hereinafter "Privacy Policy") describes how we collect and use information that We receive about You, as well as your rights in relation to that information collection, when You visit Our Mobile Application and interact with it in any way, including passively.

This Privacy Policy does not cover any information that We may receive about You through sources other than the use of Our Mobile Application. The Mobile Application may link out to other websites or mobile applications, but this Privacy Policy does not and will not apply to any of those linked websites or applications.

We are committed to the protection of Your privacy while You use Our Mobile Application.

By continuing to use the Our Mobile Application, You acknowledge that You have had the chance to

review and consider this Privacy Policy, and You acknowledge that You agree to it. This means that You also consent to the use of Your information and the method of disclosure as described in this Privacy Policy. If You do not understand the Privacy Policy or do not agree to it then you agree to immediately cease Your use of Our Mobile Application.

### **Article 3 - MODIFICATIONS AND REVISIONS:**

We reserve the right to modify, revise, or otherwise amend this Privacy Policy at any time and in any manner. Unless We specifically obtain Your consent, any changes to the Privacy Policy will only impact the information collected on or after the date of the change. It is Your responsibility to periodically check this page for any such modification, revision or amendment. Any changes made are assumed to have been accepted by Your Continued use of the Mobile Application.

### **Article 4 - HOW INFORMATION IS COLLECTED:**

Depending on how You use Our Mobile Application, You will be subject to different types of information collected and different manners of collection:

**a) Automatic Tracking:** We may collect information from You through automatic tracking systems (such as information about your browsing preferences) and/or through information that You volunteer to Us (such as information that You provide during a registration process or at other times while using the Mobile Application).

**b) Unregistered Users:** If You are a passive User of the Mobile Application and do not register at all, You may still be subject to certain passive data collection ("Passive Data Collection"). Such Passive Data Collection may include IP address information, location information, and certain browser data, such as history and/or session information.

**c) All Users:** The Passive Data Collection which applies to Unregistered Users shall also apply to all other users and/or visitors of Our Mobile Application.

**d) Related Entities:** We may share Your Personal Information, including Personal Information that identifies You personally, with any of Our parent companies, subsidiary companies, affiliates or other trusted related entities.

However, We only share Your Personal Information with a trusted related entity if that entity agrees to Our privacy standards as set out in this Privacy Policy.

**e) Email Marketing:** You may be asked to provide certain Personal Information, such as Your name and email address, for for the purpose of receiving email marketing communications. This information will only be obtained through Your voluntary disclosure.

**f) User Experience:** From time to time We may request information from You to assist Us in improving Our Mobile Application, such as demographic information or Your particular preferences.

**g) Content Interaction:** Our Mobile Application may allow you to comment on the content that We provide or the content that other users provide, such as blogs, multimedia, or forum posts. If so, We may collect some Personal Information from you at that time, such as, but not limited to, username or email address.

**h) Combined or Aggregated Information:** We may combine or aggregate some of Your Personal Information in order to better serve you and to better enhance and update Our Mobile Application for Your and other consumers' use.

We may also share such aggregated information with others, but only if that aggregated information does not contain any information that identifies You personally.

**i) Other Information:** In addition to collecting the Personal Information as already described herein, We may also collect the following Personal Information:

Food preferences

#### **Article 5 - THIRD PARTIES:**

We may utilize third party service providers ("Third Party Service Providers"), from time to time or all the time, to help Us with Our Mobile Application, and to help serve You.

We may use Third Party Service Providers to assist with information storage (such as cloud storage).

We may provide some of Your Personal Information to Third Party Service Providers in order to help Us track usage data, such as referral websites, dates and times of page requests, etc. We use this information to understand patterns of usage of, and to improve, the Mobile Application.

We may use Third Party Service Providers to host the Mobile Application. In this instance, the Third Party Service Provider will have access to your Personal Information.

We may allow third parties to advertise on the Mobile Application. These third parties may use cookies in connection with their advertisements (see the "Cookies" clause in this Privacy Policy).

We only share Your Personal Information with a Third Party Service Provider if that provider agrees to Our privacy standards as set out in this Privacy Policy.

Notwithstanding the other provisions of this Privacy Policy, We may provide Your Personal Information to a third party or to third parties in order to protect the rights, property or safety, of Us, Our customers or third parties, or as otherwise required by law.

We will not knowingly share Your Personal Information with any third parties other than in accordance with this Privacy Policy.

If Your Personal Information might be provided to a third party in a manner which is other than as explained in this Privacy Policy, You will be notified. You will also have the opportunity to request

that We not share that information.

#### **Article 6 - USE OF COOKIES:**

Cookies are small files stored on Your computer or mobile device which collect information about Your browsing behavior. We use cookies, along with other Passive Data Collection techniques and services to gather information about You through Your use of Our Mobile Application. These cookies do not access information which is stored on Your computer. Cookies do, however, enable Us to tailor Our configurations to Your needs and preferences, in order to improve Your user experience.

Most internet browsers accept cookies automatically, although You are able to change Your browser settings to control cookies, including whether or not You accept them, and how to remove them. You may also be able to set Your browser to advise You if You receive a cookie, or to block or delete cookies. However, if You do this, You may be prevented from taking full advantage of the Mobile Application.

Third Party Advertisers: We may have third parties advertise their goods or services on Our Mobile Application. These third parties may be able to learn information through cookies about Your browsing preferences in order to present more relevant advertisements to You. Cookies allow these third party advertisers to recognize Your computer for the purposes of marketing and showing You information that they think you might like. This information may include data about where You first saw or clicked on an advertisement.

We do not control the cookies that may be used by these third party advertisers. This Privacy Policy only addresses Our use of cookies and does not address the use of cookies by any of these third party advertisers. For information about the use of cookies by these third party advertisers You will need to consult their privacy policies or cookies policies, respectively.

#### **Article 7 - HOW INFORMATION IS STORED:**

We use secure physical and digital systems to store your Personal Information when appropriate. We ensure that your Personal Information is protected against unauthorized access, disclosure, or destructions.

Please note, however, that no system involving the transmission of information via the internet, or the electronic storage of data, is completely secure. However, we take the protection and storage of Your Personal Information very seriously. We take all reasonable steps to protect Your Personal Information.

#### **Article 8 - HOW INFORMATION IS USED:**

We primarily use Your Personal Information to help Us provide a better experience for you on Our Mobile Application and to provide You the services and/or information You may have requested, such as use of Our Mobile Application.

Information that does not identify You personally, but that may assist in providing Us broad overviews of Our customer base, will be used for market research or marketing efforts. Such information may include,

but is not limited to, IP address or interests based on Your cookies.

Personal Information that may be considering identifying may be used for the following:

- a) Improving Your personal user experience
- b) Marketing and advertising to You, including via email
- c) Providing customer service to You
- d) Advising You about updates to the Mobile Application or related Items

**Article 9 - DISCLOSURE OF INFORMATION:**

Although Our policy is to maintain the privacy of Your Personal Information as described herein, We may disclose Your Personal Information if We believe that it is reasonable to do so in certain cases, in Our sole and exclusive discretion. Such cases may include, but are not limited to:

- a) To satisfy any local, state, or Federal laws or regulations
- b) To respond to requests, such discovery, criminal, civil, or administrative process, subpoenas, court orders, or writs from law enforcement or other governmental or legal bodies
- c) To bring legal action against a user who has violated the law or violated the terms of use of Our Mobile Application
- d) As may be necessary for the operation of Our Mobile Application
- e) To generally cooperate with any lawful investigation about Our Users
- f) If We suspect any fraudulent activity on Our Mobile Application or if We have noticed any activity which may violate our terms or other applicable rules

**Article 10 - PUBLIC INFORMATION:**

We may allow users to post their own content or information publicly on Our Mobile Application. Such content or information may include, but is not limited to, photographs, status updates, blogs, articles, or other personal snippets. Please be aware that any such information or content that you may post should be considered entirely public and that We do not purport to maintain the privacy of such public information.

**Article 11 - OPTING OUT OF TRANSMITTALS FROM US:**

From time to time, We may send You informational or marketing communications related to Our Mobile Application such as announcements or other information. If You wish to opt-out of such communications, You may contact the following email: [optout@grumbl.es](mailto:optout@grumbl.es). You may also click the opt-out link which will

be provided at the bottom of any and all such communications.

Please be advised that even though You may opt-out of such communications, You may still receive information from Us that is specifically about Your use of Our Mobile Application or about Your account with Us.

By providing any Personal Information to us, or by using Our Mobile Application in any manner, You have created a commercial relationship with Us. As such, You agree that any email sent from Us or third-party affiliates, even unsolicited email, shall specifically not be considered SPAM, as that term is legally defined.

**Article 12 - MODIFYING YOUR INFORMATION:**

If you wish to modify any information We may have about You, or You wish to simply access any information We have about You, You may reach out to Us at the following email address: [service@grumbl.es](mailto:service@grumbl.es).

**Article 13 - ACCEPTANCE OF RISK:**

By continuing to Our Mobile Application in any manner, use the Product, You manifest Your continuing asset to this Privacy Policy. You further acknowledge, agree and accept that no transmission of information or data via the internet is not always completely secure, no matter what steps are taken. You acknowledge, agree and accept that We do not guarantee or warrant the security of any information that You provide to Us, and that You transmit such information at Your own risk.

**Article 14 - CUSTOMER SERVICE CONTACT INFORMATION:**

If You have any questions about this Privacy Policy or the way We collect information from You, or if You would like to launch a complaint about anything related to this Privacy Policy, You may contact Us at the following email address: [service@grumbl.es](mailto:service@grumbl.es).