

## **Snarf's Worldwide Holding Company, LLC Privacy Policy**

Thank you for visiting the website Snarfburger.com. To simplify the language in this Privacy Policy, the term "we" or "us" means Snarf's Worldwide Holding Company, LLC, the operator of the Snarfburger.com website. "You" means the person visiting or otherwise using the Snarfburger.com website, text message programs, or related services.

We are committed to protecting your privacy. This Privacy Policy applies to Snarfburger.com website and governs data collection and usage at all Snarfburger.com pages and services (except as expressly indicated herein).

Please read this Privacy Policy. Personal information of all users is collected, used and disclosed as described in this Privacy Policy.

### **AUTOMATIC COLLECTION AND USE OF NON-PERSONAL INFORMATION**

As with most websites, when you visit Snarfburger.com, we automatically collect and store the following, non-personally identifiable information:

- The date and time of the visit
- The originating IP address
- The type of browser, platform, and operating system used (if provided by the browser)
- The object requested
- Completion status of the request
- Pages visited and items clicked
- Sites visited immediately before and after our website
- User actions and behaviors

This automatically collected information is used by us to measure the number of visitors to the different areas of Snarfburger.com and to assist us in making Snarfburger.com more useful to visitors. This includes analyzing these logs periodically to determine the traffic through our servers, the number of pages served, the advertisements viewed, and the demand for certain areas of Snarfburger.com and topics of interest. We and third party partners may use tracking data related to your use of the Services to remember any information to avoid the need for re-entry of data, to provide customer content or information to you, including targeted advertising, to diagnose and address any technical issues, to detect fraudulent or unauthorized use, or to otherwise enhance our services. All of our logs may be preserved indefinitely by us, used at any time and in any way deemed necessary by us, and disclosed to any third party without your knowledge or consent. This automatically collected data may be linked to personally identifiable information that you enter on our website. We may share any non-personally identifiable information, such as the information automatically collected when you visit Snarfburger.com, with any third party without your knowledge or consent. We may share any linked personally identifiable information in the manner described below under the heading "USE AND SHARING OF YOUR PERSONAL INFORMATION."

We do not currently observe web browsers' "do not track" signals, and we will track your navigation of our website regardless of whether this preference is indicated.

## **USE OF COOKIES**

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. We may use cookies on Snarfburger.com to keep track of certain information you may enter, to enable certain features of the website, to record session data regarding your visit to our website, and to personalize your experience on our website. We may also use cookies to maintain user session identity if you log in to any portion of our website.

Further, we may use cookies to determine aggregate usage data such as the automatically collected information described above, to assess the technical function of our website, and to generally help us gauge the effectiveness of our website.

The cookies themselves will not contain any personally identifiable information, but they may be linked to any personally identifiable information that you enter on our website.

## **COLLECTION OF YOUR PERSONAL INFORMATION**

As part of our normal business practice, we use the Services to facilitate communication with the general public, and our potential and existing customers. As part of that process, it is often necessary or desirable for us to collect personal information. For example, you may provide us your personal information when you order products or services, register for an account or membership (including to our eClub), post feedback, a review, or a testimonial, send us a text or other message, subscribe to our communications, enter a contest, redeem a promotion, or use any other part of our Services.

The information that you may be asked to provide and that we collect may include:

- Your name;
- Your demographic information including age and gender;
- Your mailing address;
- Your current location (including IP address data);
- Your e-mail address;
- Your phone number;
- Payment details such as credit card or debit card information;
- Your username and password for any accounts you establish with us;
- Your visit information (including dates, times, locations);
- Photos, video and audio recordings, and text content that you share with us through any of the Services;
- Social media account; and
- Error logs and similar notifications related to the Services.

Your choice to submit this personal information is completely voluntary. By entering your personal information through the Services, you are providing your consent for us to use your information for the purposes described below and, if you are a current customer of ours, for purposes of enabling us to fulfill our obligations to you.

In addition to the foregoing personal information that you voluntarily provide, we will obtain the following information from sources other than you, which we may link to the personal information you provide us:

- Social media network posts and other information – If you contact or engage with us through social media, such as by “liking” us, following our account, or making a post on our page, tagging us, or otherwise tied to any of our accounts or pages, on Facebook, Twitter, or any other social media networks, we will receive and have the ability to access the information you post and information about you which you permit the social media network to share under your settings and terms with the social media network.
- Authentication Services – We may require that you access our Services through use of a third party authentication service, such as signing in through a social media account or through your mobile telephone sign-in procedures. The data we receive will be dependent on the third party authentication service provider.
- Other third parties – We may receive personal information from third parties, such as our marketing partners.
- Other public sources – We may collect personal information that is available publicly, such as through online sources.

#### **USE AND SHARING OF YOUR PERSONAL INFORMATION**

We may use and share the personal information that you provide and that we collect as follows:

1. We may use this voluntarily provided information for purposes of responding to your immediate request or feedback, verifying your authority to enter certain sections of Snarfburger.com, and for future contact and communication with you.
2. If you join our eClub or any other program that involves the use of e-mail or text messaging, we will use the information you provide to send you promotional communications in accordance with the terms of those programs, track your visits to Snarfburger locations, and market to you.
3. We may also contact you via surveys to conduct research about your opinion of current products and services or of potential new products and services that may be offered.

4. We may use your personal information to analyze our customer base and improve, develop, monitor, and tailor product and service offerings accordingly, including compiling and analyzing statistical information.

5. We occasionally hire other companies to provide limited services on our behalf, such as handling the processing and delivery of products, providing customer support, processing payment transactions, advertising service providers, administering contests or promotions, or performing statistical analysis of our services. We will only provide those companies the personal information they need to deliver the service. They are required to maintain the confidentiality of your information and are prohibited from using that information for any other purpose.

6. We may share your personal information with our affiliates who may use the information in the same manner as permitted for us under this Privacy Policy. We may transfer your personal information to a successor entity or individual upon a merger, consolidation, or other reorganization or sale of substantially all assets of the applicable business, in which we participate. We may also transfer your personal information between different offices of ours for internal management and administrative purposes.

7. We may access and/or disclose your personal information if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on us or Snarfburger.com; (b) protect and defend our rights or property, including to the Services; or (c) act under exigent circumstances to protect the personal safety of users of the Services or the public.

8. We may share any information that you provide or make available for the purpose of it being shared, such as information in any blog entry, testimonial, or social media post on, tagging, or otherwise relating to any of our accounts or pages. When you engage with us on social media or otherwise provide any such content, you are authorizing us to use that content.

9. We may use your personal information for purposes of fraud control.

10. We may share any personal information in any other situation in which you approve or consent to the sharing.

Except as described above, we do not sell, rent or lease our customer lists to third parties.

We will store any personal information that you provide to us solely through the Services in a secure location, until such time as you request that we delete your personal information as set forth in the "Control Your Personal Information" section below or until such time as we deem such personal information no longer useful in our normal business operations. In deleting or disposing of your personal information, we will use commercially reasonable efforts to ensure the protection of your personal information. Personal information collected on the Services may be stored and processed in the United States or any other country in which we or our

affiliates, subsidiaries or agents maintain facilities, and by using the Services, you consent to any such transfer of information outside of your country.

We may also disclose personal information we obtain when we believe disclosure is necessary or appropriate to comply with the law, to bring or defend legal actions, or to protect or defend our rights and property.

### **CONTROL YOUR PERSONAL INFORMATION**

We do not currently maintain a process for a user to review or request deletion of or changes to the personally identifiable information submitted. However, if any of the personal information that you provide to us through the Services changes, or if you no longer desire for us to retain your personal information for the purposes set forth in this Privacy Policy, you may request the correction, update or deletion of such information by contacting us by any of the means set forth at the bottom of this Privacy Policy. Please be sure to provide complete account information so we can identify you in our records. We will consider the request, but are not obligated to delete or change any information provided. You may stop the delivery of future promotional e-mails from us by responding directly to any e-mail you receive with a request to remove you from the mailing list.

### **SECURITY OF YOUR PERSONAL INFORMATION**

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure; to detect unauthorized access thereof; to monitor our systems for vulnerabilities; and record and retain system information to enable security audits and investigations. For example, we store the personal information you provide on computer systems with limited access that are located in controlled facilities, or with third party hosting companies or other agents who have similar conditions. When we transmit highly confidential information (such as a credit card number) over the Internet, we use a secure payment gateway so your information is protected. However, no method of transmission over the Internet, or method of electronic storage, is 100 percent secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

### **THIRD PARTY WEBSITES**

Snarfburger.com and other portions of the Services may contain links to websites not controlled or operated by us, including those of other private entities and organizations. Please be aware that when you follow a link to another website, you are then subject to the privacy policy or statement of the new website. We do not take responsibility for, nor make any claim or representation as to the privacy policy or statement of any other website. We recommend that you review the privacy policy or statement of any other website before submitting personal information to the controller or operator of such website. We encourage you to review the privacy statements of websites you choose to link to from the Services so that you can understand how those websites collect, use and share your information. We are not responsible for the privacy statements or other content on such third party websites.

### **EUROPEAN UNION ADVISORY**

The Services are not directed at individuals in the European Union and we do not currently knowingly collect any personally identifiable information from individuals in the European Union.

### **CHILDREN UNDER 13 AND 18**

The services are not directed at children under 13 years old, and we do not knowingly collect information from children under 13 years old. If you are under 13 years of age, you should not use Snarfburger.com or any other part of the Services for any purpose. For any residents of California under the age of 18 using the Services, we will permit removal of any information submitted upon the user's request.

### **E-MAIL OR TEXT COMMUNICATION**

By sending an electronic mail or text message to us, for example, by sending an e-mail requesting information on our services, you may be sending us personally identifiable information. In these cases, we may retain the information as long as necessary to accurately respond to your request. Please be aware that e-mail and text messaging are not necessarily secure from interception or misdirection. For your own protection you may want to communicate sensitive information to us using a method other than e-mail or text.

### **TERMS OF USE**

By using the Services, you are bound to the Snarfburger's **Terms of Use**. You can access those Terms of Use separately through Snarfburger.com.

### **CHANGES TO THIS POLICY**

We will occasionally update this Privacy Policy to reflect new developments and company and customer feedback. If there are material changes to this policy or in how we will use your personal information, we will post them to this page or a similar page regarding privacy on Snarfburger.com. We encourage you to periodically review this policy to be informed of how we are using and protecting your information.

### **INTERNATIONAL USE**

We make no representations that this Privacy Policy is appropriate for locations outside of the United States, or whether access to the Services and the provision of information through the Services from such locations is permitted. Those who choose to use the Services and provide us with information from such other locations do so on their own initiative and are responsible for compliance with applicable local laws.

## **CONTACT US**

If you have any questions or suggestions regarding our Privacy Policy, please contact us in any of the following ways:

By e-mail:                   operations@eatsnarfs.com  
By telephone:               720-389-7920  
By mail:                     Snarf's Worldwide Holding Company, LLC  
                                  2762 Walnut Street  
                                  Denver, Colorado 80205

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