



## ZIPPY YUM PRIVACY STATEMENTS

Privacy Policy .....	1
EU-U.S. Privacy Shield Policy .....	3

### Privacy Policy

ZippyYum, LLC knows that your privacy is important to you. Below is our privacy policy for collecting, using, securing, protecting and sharing your information.

#### The Commitment

ZippyYum, LLC is committed to protecting your privacy. We only use the private information you give us to respond to and transact orders submitted through the ZippyYum mobile application service ("Service") and to service your account. We do not sell customer information.

#### The Information We Need

When you use the Service, we will ask for your contact information (name and telephone number) and certain financial information (credit card number). If you are creating an account, we may ask for certain other personal information. This information is only used for submitting an order, completing a transaction or servicing your account. Personal information shall include but is not limited to: name, home address, zip code, home telephone number, mobile phone number, email address.

#### Consent to Use Your Information

By using the Service or submitting personal information, you agree that ZippyYum, LLC may collect, use and disclose such information in accordance with this privacy policy.

#### Use of Your Information

The private information that you give us when you place an order is only used to complete your transaction or service your account. We may also share non-financial about you with third parties that are involved or associated with the Service. ZippyYum, LLC may also provide the information to affiliated companies that provide administrative and processing services for ZippyYum, LLC. We will also use the information to provide you promotional discounts or coupons, notices of promotions and inform you of new product offerings or new locations. We will use the data, but not identifiable information, to create reports and conduct analysis. We will respond to subpoenas, court orders, legal process and administrative inquiries or to exercise our legal rights and defend against legal claims.

#### What We Don't Do

ZippyYum, LLC will never sell, share, rent or otherwise release your information to third parties other than what is stated in this policy. We may use the private information you provide us to send you e-mails about new products, or services or changes in the service.

#### Use of "cookies"

We use "cookies" to help personalize your use of the ordering service and to obtain information about your use of the application. This site may contain electronic images known as web beacons - sometimes called single-pixel gifs - that allow us to identify usage and deliver additional services to you. We may also use your IP address to track usage and administer the Service.

#### Opt-Out of Email and Mobile Updates

You may have the opportunity to elect and receive communications from ZippyYum, LLC. You will only receive email or mobile ZippyYum LLC Privacy Statements updates and promotions if you elect to receive them. If at any time to decide

you no longer want to receive these communications, you can opt-out by clicking the unsubscribe link at the bottom of any email, update your account, or provide a text message to ZippyYum at [privacy@ZippyYum.com](mailto:privacy@ZippyYum.com).

### **How Your Information is Protected**

Whenever you submit an order, make an inquiry, create an account, or enter into a transaction with ZippyYum, LLC, it is processed and forwarded through a secure server. ZippyYum, LLC requires that persons or parties who may access your information protect that information and not disclose it. We have physical, electronic and procedural safeguards to protect your information from unauthorized access, use or disclosure. ZippyYum, LLC will retain your personal information only for as long as necessary to fulfill the purpose for which the information was collected and to comply with applicable laws. Your consent to use for such purpose remains valid following termination of the relationship.

### **Links to Other Sites**

This web site links to other sites. Please be aware that ZippyYum, LLC is not responsible for the privacy practices of such other sites.

### **California Privacy Rights**

Under California's "Shine the Light" law, California residents have the right to request in writing from businesses with whom they have an established business relationship (1) a list of the categories of personal information, such as name, address, e-mail address, and the type of services provided to that customer, that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes, and (2) the names and addresses of all such third parties. To request the above information, please email the Privacy Officer at [privacy@ZippyYum.com](mailto:privacy@ZippyYum.com) or write us at:

Privacy Officer  
ZippyYum, LLC  
17853 Santiago Blvd, #107-192  
Villa Park, CA 92861

We will respond to such written requests within 30 days following receipt at the mailing address above. We reserve the right not to respond to requests submitted other than to address specified above or otherwise exempted by law. Please note that we are required only to respond to each customer once per calendar year.

### **Contact Us**

If you ever have any questions regarding our privacy policy please contact us at:

[privacy@ZippyYum.com](mailto:privacy@ZippyYum.com)  
Or at:  
Privacy Policy  
ZippyYum, LLC  
17853 Santiago Blvd, #107-192  
Villa Park, CA 92861

## EU-U.S. Privacy Shield Policy

ZippyYum, LLC (the "Company") complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. The Company has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

The Company is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

### Scope

This policy applies to all personal information knowingly received and processed by the Company in the United States from the European Economic Area including, but not limited to, personal information collected from the Company's business customers concerning their employees and/or customers in the context of the services the Company performs for its clients.

### Definitions

"The Company" means ZippyYum, LLC, its predecessors, and successors.

"Personal information" means information that identifies or reasonably may identify a natural person. Personal information does not include anonymized information or aggregate information to the extent an individual's identity cannot reasonably be derived from such information. In addition, the Company reserves all rights to use public information or information as to which an individual has given explicit consent for use, consistent with the Privacy Shield Framework.

"Agent" means any third party that processes, collects, or uses personal information pursuant to the instructions of, and solely for the benefit of, the Company, or to which the Company discloses personal information for use on its behalf.

"Sensitive personal information" means personal information that reveals a natural person's race, ethnic origin, political opinions, religious or philosophical beliefs, criminal record, or trade union membership, or that concerns a natural person's sex life or health.

### Privacy Principles

The privacy principles in this policy are based on and shall be interpreted in a manner not inconsistent with the Privacy Shield Framework.

### Notice

The Company is contracted by its clients to process their employees' and/or customers' personal data for the purpose of business process outsourcing functions such as assistance with software functionality, development and support. During that process, information collected may include personal information about an individual. This information is collected to facilitate the Company's client's human resources information management and computer systems functionality in an efficient, organized, and comprehensive matter. The Company is not responsible for the content of the information it collects, which may include personal information, nor is it responsible for the way its clients treat their employees' and customers' personal information.

### Choice

The Company generally does not collect information directly from individuals within the EEA. It merely acts as a data processor for its clients. If the Company does collect information directly from individuals within the EEA, it will offer such individuals the choice to opt out of having their personal information disclosed to a third party that is not an agent or used for a purpose other than for which it was collected originally. Similarly, to the extent required by the Privacy Shield Framework, the Company will offer individuals the choice to opt in to having their sensitive personal information disclosed to a third party that is not an agent or used for a purpose other than for which it was collected originally.

### Onward Transfer

The Company will obtain reasonable assurances from its agents that they will safeguard personal information knowingly collected by the Company concerning individuals residing in the EEA consistently with this policy and the Privacy Shield

Framework. Examples of appropriate assurances may include (1) a contract obliging the agent to afford a level of protection to the personal information that is at least equivalent to the Privacy Shield Framework, (2) Privacy Shield certification by the agent, or (3) the agent being subject to EU Directive 95/46/EC or other law providing an adequate level of privacy protection.

The Company also may disclose personal information for other purposes or to other third parties when an individual has consented to or requested such disclosure. Please be aware that the Company may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. The Company is liable for appropriate onward transfers of personal data to third parties.

### **Access**

Upon an individual's request, if feasible, the Company will offer individuals reasonable access to their personal information and will afford individuals a reasonable opportunity to correct, amend, or delete inaccurate information. If an employee or customer of one of the Company's clients would like to access personal information about him or her that is maintained by the Company, the employee or customer should make a written request to his or her employer's local human resources representative or customer service information contact, as well as to the Company at the following address:

Privacy Officer  
ZippyYum, LLC  
17853 Santiago Blvd, #107-192  
Villa Park, CA 92861  
e-mail: [privacy@zippyum.com](mailto:privacy@zippyum.com)

For security and business purposes, the Company may have to coordinate such a response with the individual's employer or other applicable entity. The Company may then contact the employee or customer and ask him or her to provide it with various pieces of personal information to process the request. The Company may limit or deny access to personal information where providing such access would be unreasonably burdensome or expensive under the circumstances or as otherwise permitted by the Privacy Shield Framework.

### **Security**

The Company will take reasonable measures including technical, physical, and administrative measures and training, as appropriate, to protect personal information from loss, misuse, and unauthorized disclosure, access, alteration, and destruction. The Company safeguards information according to established security standards and periodically assesses new technology for methods of protecting information. However, the Company cannot guarantee the security of personal information.

### **Data Integrity**

The Company will take reasonable measures to ensure that personal information is relevant for its intended use, reliable for its intended use, accurate, complete, and current.

### **Enforcement and Dispute Resolution**

The Company will conduct periodic assessments to confirm the accuracy of, and verify its adherence to, this policy. The Company will investigate suspected infractions and will take all appropriate action. Any questions, concerns, or complaints concerning the collection and use of personal information by the Company should be directed to:

ZippyYum, LLC  
Attn: Privacy Officer  
17853 Santiago Blvd, #107-192  
Villa Park, CA 92861  
e-mail: [privacy@zippyum.com](mailto:privacy@zippyum.com)

The Company will conduct a reasonable investigation of and will attempt to resolve any complaints in accordance with the principles contained in this Statement. The Company has further committed to cooperate with EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs for

more information or to file a complaint. For complaints that cannot be resolved between the Company and the complainant, the individual may seek redress from the Privacy Shield Panel, a binding arbitration mechanism.

### **Limitations**

The Company's adherence to the Privacy Shield Framework may be limited by any applicable legal, regulatory, ethical, or public interest consideration, and as expressly permitted or required by any applicable law, rule, or regulation. Examples of such limitations include (1) exceptions to the opt-in requirements for sensitive personal information permitted by Commission Decision 2000/520/EC of 26 July 2000, (2) exceptions on access as permitted by the Privacy Shield Framework, or (3) limitations under applicable European Economic Area member state directives. The Company also may disclose personal information reasonably related to the sale or disposition of all or part of its business.

### **Internet Privacy**

The Company maintains a distinct Internet Privacy Policy governing the privacy of information collected by the Company online through its United States site, which can be viewed at: <http://www.zippyum.com/pdfs/privacypolicy.pdf>

To learn more about the Privacy Shield Framework program, and to view ZippyYum, LLC's certification, please visit <https://www.privacyshield.gov>.

### **Modification of this Privacy Shield Policy**

This policy may be amended from time to time with or without notice in accordance with the Privacy Shield Framework. Any modified policies will be posted on the company's website for public viewing.

### **Contact Information**

Questions, concerns, or complaints concerning the collection and use of personal information by the Company pursuant to this Privacy Shield policy should be directed by mail or electronic mail to the following address:

ZippyYum, LLC  
Attn: Privacy Officer  
17853 Santiago Blvd, #107-192  
Villa Park, CA 92867  
e-mail: [privacy@zippyum.com](mailto:privacy@zippyum.com)