PRIVACY POLICY

Thank you for using eButler. We are committed to providing you the best online shopping and delivery experience possible. This Privacy Policy explains what information we collect, how that information is used, under what circumstances we share information, and the choices you can make about that information. This Policy applies whether you access eButler through a browser, through a mobile app, or through any other method.

Information we collect

1. **Information you provide to us or allow others to provide to us**

At various points in the eButler experience, you may provide us with information about yourself. For example, when you create an account with eButler, you provide us with personal information like your name, email address, and zip code. And if you place an order with eButler, we collect information including your address, phone number, birth date (for alcohol orders), credit card information, and the details of your order.

If you log into the eButler service through a third-party service, both we and that third-party may receive some information about you and your use of the services. For example, if you choose to log into eButler with your Facebook account, we may receive information about your contacts. We may also offer social sharing tools (such as the Facebook "Like" button) that let you share actions on eButler with other sites and vice versa. In those cases, the providers of those tools may receive information about you when you use those tools. You should check the privacy policies of these services and your settings there for more information.

Our partners may let us collect information about use of their sites/apps or share such information with us. For example, if you use an eButler button or widget on another site or app, we may receive information about your use of that button or widget and the third-party site/app.

2. **Technical information about usage of eButler**

When you use the eButler services, either through a browser or mobile app, we automatically receive some technical information about the hardware and software that is being used.

Cookies, Pixels, and Other Tracking Technologies: We and our partners use various technologies to collect information, including cookies, pixels, and device identifiers. Cookies are small text files that are sent by your computer when you access our services through a browser. We may use session cookies (which expire when you close your browser), persistent cookies (which expire when you choose to clear them from your browser), pixels, and other identifiers to collect information from your browser or device that helps us do things such as understand how you use our services, personalize your experience, measure advertising performance, and remember that you are logged in to eButler.

We employ some third-party services to help us understand the usage of eButler, and these third-parties may also deploy cookies or pixels on our site or collect information through our mobile applications. For example, we use Google Analytics to understand, in a non-personal way, how users interact with various portions of our site -- you can learn more about information that Google may collect here.

Log information: When you use eButler, our servers will record information about your usage of the service and information that is sent by your browser or device. Logs information can include things like the IP address of your device, information about the browser, operating system and/or app you are using, unique device identifiers, pages that you navigate to and links that you click, searches that you run on eButler, and other ways you interact with the service. If you are logged into the eButler service, this information is stored with your account information.

How we use your information

We may use the information we collect for various purposes, including to:

● Provide the eButler service to you, improve the quality of the service, and develop new products and services

● Allow your Personal Butler (which means those that shop for and/or deliver the order for you, including our retail partner and their employees/agents where applicable or our

third-party providers) to choose your items at a retailer site, deliver your items to you, and/or call or text you with any updates or issues

●   Charge you for the purchase and delivery costs through one or more payment processing partners

●   Offer you customized content (including advertising, coupons, and promotions).

●   Understand how users interact with our service as a whole in order to test new features or changes in our features, and improve the services for everyone

●   Provide customer service, respond to your communications and requests, and contact you about your use of eButler (Note: You can opt-out of receiving promotional communications from eButler by using the settings on the Account Info page)

What we share

eButler is a platform that presents you with a set of retailer virtual storefronts from which you can select goods for picking, packing and delivery by individual Personal Butler(s) to your location or, if available, for you to pick up in-store. In order to make this work, we need to share information about you and your order with the other parties who help enable the service. This includes, for example, the Personal Butler(s) who pick and deliver your order, and the payment processing partner(s) that we use to validate and charge your credit card. To be clear, only our payment processing partner(s) receive any credit card information.

We also share information under the following principles:

●   With your consent or at your direction — We will share your information with entities outside of eButler when we have your consent to do so or it is done at your direction. For example:

○   If you enter loyalty card information from a particular retailer, we share that information with the retailer you chose along with your order so that information can update your loyalty card account.

○　　If you share a recipe publicly on eButler, it is viewable by anyone along with your first name and last initial.

○　　If you invite friends to use eButler through our referral program or to share a shopping cart, we will share some information with the friends you invite like your name and picture. Likewise, if you choose to join someone else's cart, they will see some of your information.

●　　For external processing or service provision — We sometimes employ third parties outside of eButler to process information on our behalf or to provide certain services (such as delivery services or advertising services). For the purposes of this processing or provision of services, we may share your information with them under appropriate confidentiality provisions.

●　　For legal purposes — We may share your information when we believe that the disclosure is reasonably necessary to

(a) comply with applicable laws, regulations, legal process, or requests from law enforcement or regulatory authorities

(b) prevent, detect, or otherwise handle fraud, security, or technical issues, and

 (c) protect the safety, rights, or property of any person, the public, or eButler.

●　　On a non-personal or aggregate basis — We share information with retailers and advertisers on both a non-personally identifying basis (including order and delivery details but not including credit card information) and an aggregate basis.

●　　To enable purchase of alcohol — When you buy alcohol using eButler, we may be required by law to share certain information with the retailer who makes the sale. This information could include, among other things, the names and addresses of the purchaser and recipient, state ID information, the quantity, brand, price, proof, and volume of alcohol purchased, and a recipient signature.

●　　For business purposes — We may share your information in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a

portion of our business by another company. We may also share your information between and among eButler, and its current and future parents, affiliates, subsidiaries, and other companies under common control and ownership.

Changes to this Policy

This policy may change from time to time and any revised Policy will be posted at this page, so we encourage you to review it regularly. If we make changes, we will notify you by revising the date at the top of this Policy and, in the case of materials changes to the Policy, we may provide you with additional notice (such as a notice in our user interface or sending you a notification by email).

Confidentiality

The Parties each respectively agree to keep all Confidential Information confidential and to disclose it only to their respective officers, directors, employees, consultants and professional advisors, who:

have a need to know (and then only to the extent that each such person has a need to know);

are aware that the Confidential Information should be kept confidential;

are aware of the disclosing Party's undertaking in relation to such information in terms of this Agreement;

have been directed by the disclosing Party to keep the Confidential Information confidential and have undertaken to keep the Confidential Information confidential.

The obligations of the Parties in relation to the maintenance and non-disclosure of Confidential Information in terms of this Agreement do not extend to information that:

is disclosed to the receiving Party in terms of this Agreement but at the time of such disclosure such information is known to be in the lawful possession or control of that Party and not subject to an obligation of confidentiality;

is or becomes public knowledge, otherwise than pursuant to a breach of this Agreement by the Party who disclosed such Confidential Information; or

is required by the provisions of any law, statute or regulation, or during any court proceedings, or by the rules or regulations of any recognised stock exchange to be disclosed and the Party required to make the disclosure has limited, as far as reasonably possible, the extent of such disclosure and has consulted with the other Party prior to making such disclosure