

This Privacy Policy covers the services provided by DASA Limited trading as DASA (“DASA”, “we”, “us” or “our”). DASA is incorporated in Ireland with company registration number 711948 and having its registered address at London United Kingdom.

This Privacy Policy provides details of how we process personal data in line with our obligations under the General Data Protection Regulation (No. 2016/679) (“GDPR”), the Data Protection Act 2018 and any other laws which apply to us in relation to the processing of personal data (collectively referred to as “Data Protection Laws”). In this Privacy Policy, “controller”, “personal data” and “process” (and its derivatives) have the meanings given to those terms in Data Protection Laws.

Personal data generally means information that can be used to individually identify a person, and processing generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. DASA will be the controller of your personal data processed in connection with our services. We process your personal data across a range of systems and tools, including our end-user management system, our customer management system and communications platforms.

The DASA Platform is the technology solutions developed by DASA and made available to you, including our technology solution which enables you to order products from Businesses. DASA and the businesses who operate on the DASA Platform (“Business” or “Businesses”) are joint controllers in respect of any personal data that is processed for placing and completing orders made with a Business via the DASA Platform. If you are a customer of a Business and have queries how your personal data is processed by the Business or wish to address your rights, please contact the Business.

The purpose of this Privacy Policy is to explain DASA’s data processing activities, including how and why we process personal data.

## **Personal Data We Collect**

We collect personal data in relation to you when you provide it directly to us through the DASA Platform, when third parties such as Businesses provide us with personal data about you or when personal data about you is automatically collected in connection with your use of the DASA website \*.dasa.com (the “Website”). If you are acting on behalf of a Business or are a DASA corporate customer, we collect personal data through the Business’s or corporate customer’s engagement with DASA including personal data that is collected from you and from the Business or corporate customer or through an account created on the DASA Portal (the dedicated micro-site hosted and managed by DASA which enables the Business or corporate customer to access their DASA account).

In providing our services, we may collect and process the following information:

### **Personal Data Collected Directly From You**

We receive personal data directly from you including when you provide it to us through use of the Website, placing an order for food with a Business through the DASA Platform or through creating an account on the DASA Portal, including, but not limited to:

- Biographical and contact information. Information such as name, email address, telephone number.
- Order information. Information such as delivery address, username, payment details and location data (when an order is placed through a DASA kiosk).
- Special category data order information. You may choose to include details in your food order that indicate health information or religious beliefs.

### **Personal Data Collected From Third Party Sources**

Third Parties may provide us with personal data. For example, a Business may provide us with personal data about you in order for us to fulfill food orders placed with the Business through the DASA Platform. This includes biographical and contact information, order information, and special category order information.

*Personal Data We Automatically Collect*

Some personal data is automatically collected when you use the Website, such as:

- IP address;
  - device identifiers;
  - browser information; and
  - any personal data contained in cookie data (as explained in our Cookie Policy)
- This information is collectively referred to as “automatically collected information”.

Our Legal Justification for Processing Personal Data The below table sets out how and why we process your personal data as described above, the legal justification that supports this processing and the categories of personal data processed.

<b>Why we process your personal data</b>	<b>Legal justification</b>	<b>Categories of personal data</b>
Administration purposes		
To:		
- fulfill your food order placed with a Business through the DASA Platform;		
- communicate with you;		

<p>- respond to inquiries; and</p>		
<p>- provide support and assistance through the DASA Platform</p>	<p>Such processing is necessary for the performance of a contract between you and a Business. Where you choose to provide special category data order information, the legal justification is your explicit consent</p>	<p>Biographical and contact information, order information, automatically collected data and in certain cases, special category data order information</p>
<p>Personalization services, troubleshooting, data analysis and survey purposes</p>	<p>We have a legitimate interest to personalize our services to ensure you are provided with the best possible service</p>	
<p>We have a legitimate interest in operating and maintaining the Website and to manage, monitor and improve our services. We sometimes use surveys to assist with this</p>	<p>Biographical and contact information, order information, automatically collected data and in certain cases, special category data order information</p>	
<p>Training, quality monitoring or evaluating the services we provide</p>	<p>Such processing is necessary for the legitimate interests pursued by us in monitoring and improving our services and their usage and ensuring that our users use the Website and the DASA Platform and/or DASA Portal, as applicable, in accordance with our terms and conditions and policies</p>	<p>Biographical and contact information, order information, automatically collected data and in certain cases, special category data order information</p>

Statistical information that is not related back to individuals to help us improve the services we offer	We have a legitimate interest in carrying out certain analytics to ensure the services we provide to Businesses are effective and operate appropriately	User activity on the DASA Platform (e.g. duration on a particular page, most popular choices etc). This data is aggregated so that it is not referable to any individual user
Corporate purposes		
To:		
- engage and deal with Businesses and DASA corporate customers	If you are acting on behalf of a Business or a DASA corporate customer and we are provided with personal data, we will process that as necessary including to perform the DASA Terms & Conditions and/or other applicable contractual terms as necessary. Such processing is in our legitimate interests of managing customer relationships	Biographical and contact information, including the name of the Business or DASA corporate customer on whose behalf you act and the role you occupy in respect of such an entity
Legal and contractual matters		
To:		
- ensure our services and Website are used in accordance with applicable terms and conditions and policies		
- comply with DASA's legal obligations;		

<p>- enforce and defend our rights and resolve disputes; and</p>		
<p>- comply with our contractual obligations relating to service providers</p>	<p>We have a legitimate interest in ensuring that our services and the Website are used in accordance with our terms and conditions of use and policies and to protect against or deter fraudulent, illegal or harmful actions. Where necessary for the purpose of complying with our legal obligations such as in respect of taxation, accounting, payment card rules and standards, data protection, consumer, public health laws or adhering to court orders. We have legitimate interests in establishing, exercising or defending a legal claim, a prospective legal claim, legal proceedings or prospective legal proceedings and in resolving disputes</p>	<p>Biographical and contact information, order information, automatically collected data and in certain cases, special category data order information</p>
<p>Corporate matters</p>		
<p>To:</p>		
<p>- administer and manage the DASA group's financial and taxation affairs; and</p>		
<p>- facilitate internal and external audits and corporate transactions including fundraising and mergers and acquisitions transactions</p>	<p>Such processing is in DASA's legitimate interest to ensure prudent and effective management of its business and to scale and develop our business. DASA also has legal obligations in respect of legal and financial matters under company law and accounting regulations</p>	<p>Biographical and contact information, order information and automatically collected data</p>
<p>Disclosure requests</p>		

To:		
- comply with DASA's legal obligations	We will disclose personal data where we receive a legally binding request to disclose personal data from law enforcement or other bodies or where we have a legitimate interest in assisting law enforcement or other agencies in respect of an investigation	Biographical information, contact information, reward information and employment information

### Individual Data Subject Rights

Data Protection Laws provide certain rights in favor of data subjects (the “Data Subject Rights”).

Data Subject Rights include the right to:

- receive detailed information on the processing (as per transparency obligations on controllers) which we have provided through this Privacy Policy;
- access personal data;
- rectify or erase personal data (i.e. right to be forgotten);
- restrict processing;
- withdraw consent to processing based on consent. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal;
- data portability;
- object to processing of personal data based on legitimate interests and object to processing of personal data for direct marketing purposes;
- object to automated decision making (including profiling); and
- complain to any competent data protection supervisory authority or DASA's lead supervisory authority, the Data Protection Commission.

These Data Subject Rights will be exercisable by you subject to limitations as provided for under Data Protection Laws.

If you require more information about how a Business processes your personal data or you wish to exercise any of your data subject rights in respect of the processing of your personal data by a Business, you should contact the Business directly.

You may contact us or make a request to exercise any Data Subject Right by contacting [help@dasa.com](mailto:help@dasa.com). Your request will be dealt with in accordance with Data Protection Laws.

## Disclosing Your Information

Your personal data may be shared with wholly-owned subsidiaries of DASA in respect of collaboration between entities in the DASA group. These entities are DASA UK Limited, DASA GmbH, DASA, Inc. and any other wholly-owned subsidiaries of DASA that may be incorporated.

DASA may engage other companies and people to perform tasks on our behalf and may need to share personal data with them to enable us to provide you with our services.

These other companies and people include:

- delivery service providers. To be able to provide food delivery services, these providers receive your biographical and contact information and order information.
- hosting service providers. To be able to provide online hosting services, these providers receive your biographical and contact information, order information, and special category data information.
- data analysis service providers. To be able to provide data analysis services, these providers receive order information.
- marketing assistance providers. To be able to provide marketing assistance, these providers receive your biographical and contact information and order information.
- payment service providers. To be able to provide payment services, these providers receive biographical and contact information and order information.

DASA may also disclose personal data to Businesses. As part of the food ordering process, a Business may obtain from DASA biographical and contact information, order related information, and special category data order information.



DASA may disclose personal data in some scenarios e.g. when you violate our terms and conditions or other policies. DASA may disclose such personal data, at our sole discretion, if we believe it necessary or appropriate in connection with investigation of fraud, IP infringement, piracy, or other unlawful activity. This may require disclosure of biographical and contact information and automatically collected data, amongst other personal data.

As set out in the table above, we will disclose personal data where we receive a legally binding request to disclose personal data from law enforcement or other bodies or where we have a legitimate interest in assisting law enforcement or other agencies in respect of an investigation.

As set out in the table above, in some cases, DASA may buy or sell its assets which may involve the transfer of user information. DASA will transfer such information if we are acquired by or merged with another company.

## Businesses

As noted above, as part of the food ordering process, a Business may obtain from DASA biographical and contact information, order information, special category data order information, or other personal data.

Where you consent to direct marketing, your consent is provided directly to the Business. DASA, acting as a processor, may assist Businesses in managing its users' consent preferences. You may unsubscribe from direct marketing through the opt-out link included in marketing communications. DASA also acts as a processor when it assists Businesses with managing their analytics. The Business's Privacy Policy and notices will govern in respect of marketing activities and analytics conducted by DASA acting as a processor.

## Data Retention

We will keep personal data only for as long as the retention of such personal data is deemed necessary for the purposes for which that personal data are processed (as described in this Privacy Policy) unless we are required to retain your personal data for a longer period (e.g. in the event of legal proceedings or investigations).

## Data Transfers Outside the EEA

We may transfer personal data outside of the European Economic Area (the “EEA”). Any such transfers will be in accordance with applicable law and appropriate safeguards such as the standard contractual clauses approved under EU law from time to time. Any transfers of personal data from the EEA to the United Kingdom are conducted on the basis of the European Commission’s adequacy decision in respect of the UK, available on the European Commission website. If you require further information or would like to access a copy of the applicable standard contractual clauses, please contact [help@dasa.com](mailto:help@dasa.com).

## Necessity of Provision of Certain Personal Data

Certain information, such as biographical and contact details and order details have to be provided to enable us to provide our services to you. If you do not provide this information, it will mean that we are not able to provide our services to you.

## Third Party Links

On occasion, we include links to third parties on the Website. Where we provide a link it does not mean that we have any control over the linked website or its privacy policy or that we endorse, or approve that website’s policy towards visitor privacy. You should review the linked website’s privacy policy before sending them any personal data.

## Service-related Announcements

DASA may send you DASA Platform service-related announcements. You may not opt-out of service-related communications.

## Contacting Us

For further information about this Privacy Policy or the processing of your personal data by or on behalf of DASA, please contact us at [help@dasa.com](mailto:help@dasa.com). While you may make a complaint in respect of DASA’s compliance with Data Protection Laws to any competent data protection supervisory authority or DASA’s lead supervisory authority, the Data

Protection Commission, we ask that you contact us in the first instance to give us the opportunity to address your concerns.

## Changes

The manner in which we process personal data will evolve and we will update this Privacy Policy from time to time to reflect changing practices. We will update the “Last Modified” date accordingly at the end of this Privacy Policy. We will notify you of material updates but please review this Privacy Policy from time to time.

## Last Modified

This Privacy Policy was last updated in August 2023.