

PRIVACY POLICY OF THE CIRCOLOPOPOLARE WEBSITE

The purpose of this privacy policy (hereinafter, the "**Privacy Policy**") is to define the terms and conditions under which BIG MAMMA SAS (hereinafter, "**BIG MAMMA**") may process the personal data of individuals (hereinafter the "**Users**") who use the website www.circolopopolare.com (hereinafter the "**Website**") and resort to the use of cookies when browsing the Website.

The Privacy Policy is available at all times in a special, dedicated tab on the Website and can be downloaded for the User to keep on a durable medium. Any access to and use of the Website by the User implies acceptance of this Privacy Policy without reservation or restriction.

In the event of non-acceptance of the Privacy Policy stipulated herein, the User must renounce access to the services offered by the Website.

BIG MAMMA reserves the right to modify the Privacy Policy at any time and without prior notice, in particular to adapt it to developments on the Website and to any applicable regulations. The User is therefore advised to refer to the latest version of the Privacy Policy before accessing and browsing the Website.

1. IDENTITY OF THE DATA PROCESSOR

For the processing of Personal Data on the Website, the data processor is BIG MAMMA SAS ("**BIG MAMMA**"), registered in the PARIS Trade and Companies Register under number 838 501 773, and whose contact details are specified below:

- Registered office: 36 rue du Sentier – 75002 PARIS (FRANCE)
- E-mail address: privacy@bigmamma.com

For any questions or requests for information concerning the Website, and to exercise his or her rights as listed in Article 5 below, the User may contact BIG MAMMA at the above e-mail address or by sending a registered letter with acknowledgement of receipt to the above postal address.

2. LEGAL BASIS AND PURPOSES OF PERSONAL DATA PROCESSING

"Personal Data" means any personal data relating to an identified or identifiable natural person.

Pursuant to European and French legislation on the protection of Personal Data (European Regulation no. 2016/679 of April 27, 2016 on the protection of personal data known as the "RGPD" and Loi Informatique et Libertés no. 78-17 of January 6, 1978), BIG MAMMA processes Users' Personal Data solely for the purposes and pursuant to the legal bases defined below.

2.1. Processing carried out for the purposes of online ordering and booking

By browsing the Website, the User can access online reservation for CIRCOLO POPOLARE restaurants and order gift cards (the "gift cards" service) for use in all CIRCOLO POPOLARE and BIG MAMMA restaurants in the United Kingdom, provided by the service providers of the Group BIG MAMMA (SEVENROOMS and STRIPE).

In order to process the User's order or reservation, the companies of the Group BIG MAMMA receive and process the Personal Data collected by the relevant service provider.

The processing of this Personal Data by the companies of the Group BIG MAMMA is necessary for the processing and management of online orders and reservations in each restaurant concerned (legal basis: art. 6.1.b of the GDPR - performance of a contract with the data subject).

2.2. Processing carried out for the purpose of managing privatization requests and group reservations

The User can make a request for privatization or reservation for a group of people in a restaurant of the "CIRCOLO POPOLARE" brand of the BIG MAMMA Group by filling out a contact form on the Website. For this purpose, BIG MAMMA collects and processes the following personal data concerning the User:

- surname, first name;
- telephone number and e-mail address;
- employer's identity in the case of a professional request;
- any Personal Data voluntarily communicated by the User in the free field of the contact form.

The processing of these Personal Data is necessary for the processing and management of privatization requests and group reservations in each restaurant concerned (legal basis: art. 6.1.b of the RGPD - performance of a contract with the data subject).

2.3. Processing for the purpose of managing job applications

While browsing the Website, the User may access the job application service provided by an service provider external to the Group BIG MAMMA (TEAMTAILOR).

With their consent and in order to process their application, BIG MAMMA receives and processes the Personal Data collected by the service provider concerned.

The processing of this Personal Data enables BIG MAMMA, with the User's consent, to process his or her application (legal basis: art. 6.1.a of the GDPR - consent of the data subject).

The User may withdraw his or her consent to this processing at any time. However, any processing carried out prior to such withdrawal will remain lawful.

2.4. Processing for the purpose of sending the newsletter

The User has the option of subscribing to the "BIG MAMMA" newsletter on the Website. With his or her consent, BIG MAMMA collects and processes the following personal data concerning the User:

- E-mail address.

The processing of this Personal Data enables BIG MAMMA, with the User's consent, to send him newsletters (legal basis: art. 6.1.a of the GDPR - consent of the person concerned).

The User may withdraw his or her consent to such processing at any time. However, any processing carried out prior to such withdrawal will remain lawful.

3. PERSONAL DATA RECIPIENTS

Personal data processed by BIG MAMMA is communicated to the following recipients, solely for the purposes described above.

3.1 BIG MAMMA's in-house departments

BIG MAMMA shares Users' Personal Data with its internal departments, solely for the purposes defined in Article 2 above and for which they are authorized.

Members of the internal departments who process Users' Personal Data are bound by an obligation of confidentiality regarding such Data.

3.2 Subsidiaries of the Group BIG MAMMA

BIG MAMMA shares Users' Personal Data with its subsidiaries for the strict purpose of:

- managing orders, reservations, privatization requests and group reservations in each restaurant managed by a subsidiary;
- managing job applications for positions to be filled in each restaurant managed by a subsidiary.

Pursuant to European and French legislation on the protection of personal data (European Regulation n°2016/679 of April 27, 2016 on the protection of personal data known as the “GDPR” and the French Law *Informatique et Libertés* n°78-17 of January 6, 1978), the subsidiaries of the Group BIG MAMMA process Users' Personal Data solely for the purposes and by virtue of the legal bases defined above.

3.3 Third-party suppliers and service providers

BIG MAMMA shares Users' Personal Data with its IT service providers, who have the status of subcontractors within the meaning of the GDPR.

These subcontractors process Users' Personal Data on behalf of BIG MAMMA and solely for the purposes defined in Article 2 above.

3.4 Administrative and judicial authorities (if necessary)

BIG MAMMA will only disclose Users' Personal Data to administrative or judicial authorities if required to do so by law.

4. RETENTION OF PERSONAL DATA

BIG MAMMA retains Users' Personal Data for the period required to fulfill the purposes described in this Privacy Policy. The criteria used to determine the retention period include: (i) the length of the relationship between BIG MAMMA and the User; (ii) whether there is a legal or commercial obligation to which BIG MAMMA is subject; or (iii) whether a longer retention period is required or permitted by law.

In this context:

- the Personal Data required to process online gift card orders are kept for **5 years** from the date of order, with the exception of Personal Data appearing on accounting documents, which are kept for **10 years**;

- the Personal Data required to manage privatization and group reservations and requests are kept for **3 years** from the date of collection;
- the Personal Data required to manage job applications are deleted at the end of the recruitment process if the application is rejected, or kept for **2 years** from the last contact with the applicant if the applicant consents;
- Personal Data required to send newsletters are kept for a period of **3 years** from the date of collection or last contact with the User concerned.

5. USER'S RIGHTS

The User has the following rights regarding the Personal Data collected:

- learn about, update, modify or request the deletion of their Personal Data;
- request the limitation of and/or oppose the processing of their Personal Data from the Website;
- request the portability and transfer of their Personal Data from the Website to any other website or application.

The User may exercise the aforementioned rights by contacting BIG MAMMA directly at the following e-mail address: privacy@bigmamma.com.

The User also has the right to lodge a complaint with the CNIL (Commission Nationale de l'Informatique et des Libertés - www.cnil.fr) or with any competent court.

6. COOKIES

6.1 Definition

Cookies are tools used to store data in the User's terminal equipment, to enable the Website to send information to the User's browser, and to enable the browser to send information back to the Website.

During their period of validity, cookies make it possible to store status information when a browser accesses the various pages of the Website or when the browser subsequently returns to the Website.

Only the sender of a cookie can read or modify the data it contains.

There are different types of cookies:

- session cookies, which disappear as soon as the user leaves the Website;
- permanent cookies, which remain on terminals until their lifetime expires, or until the User deletes them using the functionalities of his or her browser.

In any case, cookies are kept for a maximum of 13 months after they are deposited.

6.2 Purpose and use of cookies

- **Audience measurement cookies**

If the User consents, BIG MAMMA may use cookies when browsing the Website for audience measurement purposes. These cookies enable BIG MAMMA to measure the number of visitors to the

"gift cards" service accessible from the Website. In this way, BIG MAMMA can better understand its customers' expectations and offer them products and services that are suited to their needs.

Personal data is collected by these cookies. It only concerns the User's IP address.

The User may freely accept or refuse the use of these cookies when he or she starts browsing the Website, via the information banner that appears on the page. These cookies will only be activated with the User's express consent.

If the User has given his or her consent to the use of these cookies, he or she may withdraw it at any time in the future, by modifying the settings relating to cookies.

- **Anonymous statistics cookies**

If the User consents, BIG MAMMA may use cookies when browsing the Website in order to compile anonymous statistics. These cookies enable BIG MAMMA to collect anonymous information on the characteristics of its customers. BIG MAMMA can therefore better understand its customers' expectations and offer them products and services that are suited to their needs.

Personal Data are collected by these cookies, before being anonymized. This concerns the type of device used, its location and the User's gender.

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6.3 Service providers involved in cookie management

For the management of cookies used on the Website, BIG MAMMA uses an external service provider, the company Google LLC, located 1600 Amphitheatre Parkway in Mountain View in the United States, ("Firebase" and "Google Analytics" services).

This provider has access to the cookies and Personal Data they collect, for the exclusive purpose of providing the aforementioned services, to the exclusion of any other use.

This provider is "Privacy Shield" certified, a mechanism recognized by the European Commission that enables companies to guarantee that they provide an adequate level of protection for the Personal Data they receive from the European Union.

To find out more about the Privacy Shield program, and to view the provider's certification: <https://www.privacyshield.gov/list>.

6.4 Browser-based cookie management

The User has several options for refusing the deposit of cookies.

While most browsers are set by default to accept the installation of cookies, the User can choose to accept all cookies, or to reject them systematically, or to choose which cookies to accept, depending on the sender.

You can:

- configure their browser to accept or reject cookies on a case-by-case basis, prior to their installation;
- regularly delete cookies from different terminals via their browser.

To manage cookies and your choices, each browser's configuration is different. This is described in the browser's help menu, where you can find out how to modify your cookie preferences.

However, by setting browsers to refuse cookies, certain functions may no longer be accessible, for which BIG MAMMA cannot be held responsible.

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If the User has given his or her consent to the use of these cookies, he or she may withdraw it at any time in the future, by modifying the settings relating to cookies.

- **Anonymous statistics cookies**

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