

# Privacy Policy

**Updated August 21, 2024**

**INSERVO LTD** ("**INSERVO**," "we," "us," or "our"), along with its affiliated companies, is committed to safeguarding your privacy. This Privacy Policy (the "**Policy**") describes INSERVO's policies and procedures regarding the collection, use, and disclosure of the information collected through the INSERVO websites, [www.inservo.co.uk](http://www.inservo.co.uk) and [app.inservo.co.uk](http://app.inservo.co.uk) (collectively, the "**Site**"), our mobile applications, and other affiliated websites owned and operated by INSERVO (the Site and any products and services provided by INSERVO are collectively referred to as the "**Services**," which includes the Platform, as defined below).

## 1. INSERVO Service Overview

INSERVO LTD provides two main applications to our customers (the "**Venues**"):

1. **Reservation Platform for Restaurants:** A platform that allows restaurants to manage reservations from their customers.
2. **AI Reservation Assistant:** An AI-powered assistant that can be embedded on a restaurant's website or used via WhatsApp to facilitate reservations.

Each Venue uses INSERVO's proprietary reservation and inventory management system (the "**Platform**"). The Platform interacts with the Venue to find available reservations, secure, change, or cancel online reservations, and confirm that reservations were honoured. When reservations are placed directly with a Venue using the Platform, personal data about patrons of a Venue (each, a "**Guest**") is recorded in the Platform to assist the Venue in managing the reservation and providing services to such Guest.

While an individual Venue's reservation inventory is accessible to the Platform to perform these functions, other information that may be stored by a Venue (for

example, credit card numbers) is not accessible to the Platform. Note that in no case does INSERVO store credit card or payment information on the Services; all such information is held by our third-party payment processor(s) or the Venue itself.

**A Note for Guests:** INSERVO's customers are the Venues (or agents that Venues have contracted to handle their reservations), and only Venue employees or agents have Accounts (as defined below) with INSERVO. Guests do not have Accounts on the Platform. Except where provisions are specific to Registered Users, Accounts, or Guests, all the terms of this Policy apply equally to both Guest and Registered User information. Our use of information that we process on behalf of our Venues may be governed by our agreements with such Venues. If you have concerns regarding your personal data that we process on behalf of a Venue, please direct your concerns to that Venue.

## 2. Types of Data We Collect

### Information You Provide to Us

- **Account Data (Registered Users):** We may collect personal data from you, such as your first and last name, business address, trading name, legal name, phone number, and email address when you create an account to use the Services ("**Account**"). Only representatives of a Venue may create an Account (each such individual, a "**Registered User**").
- **Reservation Data (Guests):** When Guests make reservations through the Services, we collect their first name, last name, email address, and phone number.
- **Communications Data:** If you provide us feedback or contact us via email or other means, we will collect your name and contact information, as well as any other content included in the communication, to respond to you.
- **Survey Data:** If you participate in a survey conducted via the Services, we may collect additional profile information.
- **Marketing Data:** Such as your preferences for receiving our marketing communications and details about your engagement with them.

### Information Collected Via Technology

- **Cookies and Tracking Technologies:** We use cookies and similar technologies to collect information about your interaction with our Site and Services. This may include device data (e.g., IP address, browser type), online activity data (e.g., pages viewed, access times), and log files.
- **Log Files:** As is true of most websites, we gather certain information automatically and store it in log files. This includes IP addresses, browser type, ISP, referring/exit pages, operating system, date/time stamp, and clickstream data.

- **Mobile Services:** If you access the Services via a mobile device, we may collect device-level data to improve performance and user experience.

**How We Respond to Do Not Track Signals:** We do not currently respond to "Do Not Track" signals.

## **Information Collected From Third Parties**

- **Venues:** When a Venue takes a reservation directly from a Guest or receives such information from a third-party service or platform (e.g., Google, Yelp), personal data about the Guest is recorded in the Platform. In addition, Guest notes (such as dining preferences) may be recorded in the Platform by Venue staff.
- **Third-Party Services:** Such as social networking sites that you use in connection with, or otherwise link to, the Site or Services. This data may include your username, profile picture, and other information associated with your account on that third-party service.

**Location of Servers:** We maintain servers in the United Kingdom, and your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this Policy. For information on how we transfer your personal data outside the European Economic Area, please see the **Additional Information for European Users** below.

## 3. Use of Your Data

### 3.1 By INSERVO

#### Service Delivery and Operations

We use your personal data in the following ways:

- Facilitate the creation of and secure your Account (Registered Users only).
- Identify you as a user of the Services.
- Provide, operate, and improve the Site and Services.
- Process and manage reservations made by Guests.
- Provide the Services you request.
- Communicate about the Services, including sending you administrative email notifications, such as security or support and maintenance advisories.
- Respond to your inquiries related to employment opportunities or other requests.
- Understand your needs and interests, and personalise your experience with the Services and our communications.
- Send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes of INSERVO (Registered Users only).

#### Marketing and Advertising

- **Direct Marketing:** We may send you direct marketing communications and may personalise these messages based on your needs and interests. You may opt out of our marketing communications at any time.
- **Interest-Based Advertising:** Our third-party advertising partners may use cookies and similar technologies to collect information about your interaction with the Site and Services and use that information to serve online ads that they think will interest you.

#### Compliance and Protection

We may use your personal data to:

- Comply with applicable laws, lawful requests, and legal processes.
- Protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims).
- Audit our internal processes for compliance with legal and contractual requirements or our internal policies.
- Enforce the terms and conditions that govern the Site and Services.
- Prevent, identify, investigate, and deter fraudulent, harmful, unauthorised, unethical, or illegal activity.

### **Service Improvement and Analytics**

We may use your personal data to analyse your usage of the Site and Services, improve the Site and Services, help us understand user activity, and develop new products and services.

### **With Your Consent**

In some cases, we may specifically ask for your consent to collect, use, or share your personal data, such as when required by law.

### **Anonymous Data**

We may create anonymous, aggregated, and/or de-identified records from personal data of both Guests and Registered Users. We use this data to analyse request and usage patterns so that we may enhance the content of our Services and improve Site navigation.

## **3.2 By Venues**

When you make a reservation using the Services, your name, email address, and phone number are provided to the applicable Venue to facilitate your reservation and for the Venue to contact you if necessary.

Venues may process your personal data in accordance with their own privacy policies. INSERVO encourages Venues to comply with data protection requirements, but we are not responsible for a Venue's failure to comply with applicable laws. Any complaints or inquiries regarding use of your information by a Venue, or marketing communications from a Venue, should be addressed directly to the Venue in question.

In no event will INSERVO be responsible for information management and use of data collected by Venues from their own websites and not stored on the Services.

## 4. Sharing of Your Data

We may disclose your personal data as described below and as described elsewhere in this Policy.

- **Service Providers:** We may share your personal data with third-party service providers to provide you with the Services, conduct quality assurance testing, facilitate creation of Accounts, provide technical support, and perform other services on our behalf.
- **Payment Processors:** We use third-party payment processors to process any payments made through the Platform to Venues. These payment processors may use your payment data in accordance with their privacy policies.
- **Social Networking Sites:** We allow Guests to place reservations with Venues via social networking sites (e.g., Facebook or Twitter). Guests who access the Platform via an SNS consent to INSERVO receiving information required to make the reservation from the SNS.
- **Affiliates:** We may share some or all of your personal data with our parent company, joint ventures, or other companies under common control ("**Affiliates**").
- **Corporate Restructuring:** We may share some or all of your personal data in connection with or during negotiation of any merger, financing, acquisition, or dissolution transaction involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets.
- **Professional Advisors:** Professional advisors, such as lawyers, auditors, bankers, and insurers, where necessary in the course of the professional services that they render to us.
- **Authorities and Others:** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for compliance and protection purposes.



## 5. Communications and Disclosures

### From INSERVO

INSERVO sends automated service messages to Guests via email and/or text pertaining to upcoming or recent Venue reservations or other core functions of the Services, such as confirmations, reminders, and/or invitations to provide customer feedback ("**Service Communications**"). In addition, Guests and Registered Users may also opt in to receive promotional notices, special offers, and other related information from INSERVO ("**Marketing Communications**"). You may always unsubscribe from Marketing Communications. However, so long as you use the Services, we may send essential Service Communications to the contact information associated with your Account.

### From Venues

Venues may independently use the Platform to send Guests Service Communications and, if opted in by a Guest, Marketing Communications. Communications sent directly from a Venue via the Platform are subject to this Policy, but communications sent by a Venue outside of the Platform are subject to the Venue's policies and practices.

### Third Parties

INSERVO will never sell, rent, loan, or otherwise distribute any of your personal data to any third party except as set forth in this Policy without your prior, express written consent.

## **6. Accounts**

Registered Users can view and manage their Account information, including any associated personal data, by accessing their account settings on the Platform.

Guests and Registered Users may at any time contact INSERVO at [info@inservo.co.uk](mailto:info@inservo.co.uk) to request that all personal data be deactivated.

## **7. How INSERVO Protects Data**

INSERVO uses a number of technical, organisational, and physical safeguards designed to protect the personal data we collect. These measures include encryption, access controls, secure hosting environments, and regular security assessments. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal data.

## **8. A Note About Children**

We do not intentionally gather personal data from visitors who are under the age of 18. If we learn that a child under the age of 18 has submitted personal data to INSERVO, we will attempt to delete such data as soon as possible. If you believe that we might have any personal data from a child under 18, please contact us at [info@inservo.co.uk](mailto:info@inservo.co.uk).

## **9. Changes to This Policy**

Any changes to this Policy will always be posted to this page of the Site, along with the effective date of the updated Policy. You should check this page periodically to stay abreast of any such changes. INSERVO will never make changes to the Policy that violate any applicable privacy laws. For any material changes to the Policy, we will notify you via email or by placing a prominent notice on the homepage of our Site.

## **10. Disclosure, Correction, Control of Personal Data**

If you wish to have INSERVO disclose what personal data of yours it holds, and/or how INSERVO obtained such information, or if you desire the correction, suspension of use, or to be informed of the purpose of use of personal data by INSERVO, please contact us as set forth below. INSERVO will process such request in compliance with all applicable privacy laws but may first confirm that such request has been made by you personally.

## 11. Your Privacy Rights

As a UK-based company, INSERVO LTD complies with the UK General Data Protection Regulation ("UK GDPR"). You have certain rights regarding your personal data, including:

- **Access:** You can request information about how we collect and use your personal data and request a copy of the personal data we have collected about you.
- **Correction:** You can ask us to correct inaccurate personal data that we have collected about you.
- **Deletion:** You can ask us, subject to certain exceptions, to delete the personal data that we have collected from you.
- **Objection:** You can object to our processing of your personal data where we are relying on legitimate interests.
- **Restriction:** You can request the restriction of processing of your personal data.
- **Data Portability:** You can request the transfer of your personal data to another party.
- **Withdraw Consent:** Where processing is based on consent, you can withdraw your consent at any time.

To exercise these rights, please contact us at [info@inservo.co.uk](mailto:info@inservo.co.uk).

## 12. Additional Information for European Users

### Where This Notice Applies

The information provided in this section applies only to individuals in the European Economic Area, United Kingdom, and Switzerland ("Europe").

### Controller

INSERVO LTD is the controller in respect of the processing of Registered User Accounts and website visitor personal data covered by this Policy for purposes of the General Data Protection Regulation ("GDPR").

### Legal Bases

We process your personal data based on the following legal grounds:

- **Contractual Necessity:** To perform our contract with you or to take steps at your request before entering into a contract.
- **Legitimate Interests:** To operate our business and provide the Services, except where overridden by your interests or fundamental rights.
- **Consent:** Where you have given consent to the processing of your personal data.
- **Compliance with Law:** To comply with a legal obligation.

### Data Transfers

We may transfer your personal data outside of Europe, including to countries that may not provide the same level of data protection as your home country. When we do so, we ensure appropriate safeguards are in place, such as standard contractual clauses approved by the European Commission.

### Your Rights

Under the GDPR, you have the following rights:

- **Access, Correction, and Deletion:** You can request access to, correction of, or deletion of your personal data.
- **Objection and Restriction:** You can object to or request the restriction of processing of your personal data.
- **Data Portability:** You can request a copy of your personal data in a structured, machine-readable format.
- **Withdraw Consent:** Where processing is based on consent, you can withdraw your consent at any time.

To exercise these rights, please contact us at [info@inservo.co.uk](mailto:info@inservo.co.uk).

## 13. Contacting INSERVO

If you have any questions, concerns, or complaints about our Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us at:

- **Email:** [info@inservo.co.uk](mailto:info@inservo.co.uk)
- **Operational Address:**  
**INSERVO LTD**  
Tower House  
67-71 Lewisham High Street  
Lewisham, London  
Greater London, SE13 5JX, Suite 148

**Company Registration Number:** 15241013

**Registered Address:**

**INSERVO LTD**

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