

The Culinary Exchange, LLC Privacy Policy

Effective date: Dec 13, 2015

The Culinary Exchange, LLC (referred to as “The Culinary Exchange, LLC,” “Company,” “us,” “our,” or “we”), is committed to protecting your privacy online. This privacy policy (“Policy”) discloses our privacy practices for our site, located at www.theculinaryexchange.com, and related mobile applications (collectively “Platform”) and various related services (“Services”). This Policy is designed to help you understand what information we collect and how we collect, share, and use the information. The Policy applies to all of our Platform visitors, registered users, and subscribers. By accessing or using our Platform, you consent to the collection, transfer, manipulation, storage, disclosure, and other uses of your information as described in this Policy. Any reference to “you”, “your”, or “user” in this Policy shall mean the end-user of our Platform.

Irrespective of which country you reside in or supply information from, you authorize us to use your information in the United States and any other country where we may operate. We control and/or operate the Platform from offices in the United States of America. We do not represent that materials on the Platform are appropriate or available for use in other locations. Persons who choose to access this Platform from other locations do so on their own initiative and at their own risk, and are responsible for compliance with local laws, if and to the extent local laws are applicable.

What types of Personal Information do we collect?

The information we gather from users enables us to personalize and improve our Services, and allows our users to set up a user account and profile that can be used to personalize their experience on the Platform. We collect the following types of information (all considered “Personal Information”) from our users:

Personal Information you provide to us:

We collect and store the following types of information on our servers only when you optionally choose to provide it to us by filling out a form or taking some other explicit action. You can choose not to provide us with any of the information below, but you may not be able to take advantage of certain features without providing the appropriate information.

- First and/or last name.
- Email.
- Billing information
- Address.
- User name and password.
- Phone number.
- Information publicly disclosed through our Platform.
- Demographic data

Personal Information collected automatically:

In order to understand how our Platform is being used and to make it better, we also automatically receive, store, and log certain types of technical information whenever you interact with our Platform. Information of this sort includes:

- Technical information about a users’ browser and mobile device.
- Usage information such as the pages users request, searches they conduct, emails they open, links clicked and features they interact with.
- IP address, tokens, cookies, and device identifiers.

Google Analytics Advertising Features - Demographic and Interest Data

We use a tool called “Google Analytics” to collect information about use of this site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. We use the information we get from Google Analytics to improve this site and to perform our marketing and advertising activity. For example, Google Analytics collects IP addresses assigned to you on the date you visit this site, rather than your name or other identifying information.

The Culinary Exchange, through Google Analytics, collects potentially personally-identifying information to perform marketing, advertising and commerce activities. Google advertising analytics features offer information for Remarketing, Google Display Network Impression Reporting, the Doubleclick Campaign Manager integration, or Google Analytics Demographics and Interest Reporting. The Culinary Exchange uses the Google Analytics Demographics and Interest Reporting feature to identify trends in the usage of its website and to better understand it’s visitors/users and customers for marketing, advertising and commerce activities. The information may be published in reports for internal use. Visitors can opt-out of Google Analytics for Display Advertising and customer Display Network ads using [Ads Settings \(https://www.google.com/settings/u/0/ads/\)](https://www.google.com/settings/u/0/ads/). At any time, visitors may choose to opt-out of Google Analytics tracking with the Google Analytics opt-out browser add-on (<https://tools.google.com/dlpage/gaoptout/>).

The Culinary Exchange will not facilitate the merging of personally-identifiable information with non-personally identifiable information collected through any Google advertising product or feature unless we have robust notice of, and the user's prior affirmative (i.e., opt-in) consent to, that merger.

Opting Out Of Other Browser Ads

For information about opting out of Gourmet Ads and ad serving partners on the site please visit <http://www.gourmetads.com/about/privacy-policy>”.

How do we use your information?

In addition to the specific uses discussed above, Personal Information you submit to us may be used in the following ways:

- To provide access to our products and services.
- To keep users logged into our Platform.
- To communicate with users about their accounts.
- To process or fulfill request(s) and/or order(s) for products, Services, information or features.
- To provide users with updates, offers, and announcements about products, new products, services, features, promotions, enhancements, improvements or updates.
- To notify users when we make material changes to our Privacy Policy or Platform terms and conditions.
- To solicit input and feedback to improve user experience.
- To help us optimize our Services.
- To Perform Marketing, Advertising and Commerce Activities
- As we, in our sole discretion, otherwise determine to be necessary or required to ensure the safety and/or integrity of our users, employees, third parties, members of the public, and/or our Platform and Service.

We may provide these Services ourselves or share the information with partners who will provide the services for us. We may use aggregated user data to market the Service or the Platform to others.

How do we share your Personal Information?

We will not disclose Personal Information of our users to any persons or entities outside of our company, nor lease, license, rent, transfer, disclose, disseminate or otherwise grant access to such information unless:

- Users have been given an opportunity to “opt-in” and have agreed to opt-in to such disclosure of their information;
- We must share user information in order to provide a product or service that has been ordered or requested by that user, in which case we will require that any third person or entity we use to fulfill the order agrees that it does not have the right to use user information other than to fulfill the order or request;
- We believe in good faith, that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- We are involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, at which point users’ Personal Information may be sold or transferred as part of that transaction;
- It is to any other third party with a user’s prior consent to do so;
- We receive a request in connection with a judicial, governmental or legal inquiry, investigation, order, or proceeding;
- It is reasonably necessary to enforce our other Platform terms and conditions, this Policy, or any other legal agreements we enter with our users;
- It is required to detect, prevent, or otherwise address fraud, abuse, misuse, potential violations of law (or rule/regulation), and/or security or technical issues; or
- It is required or reasonably necessary to protect against imminent harm to the rights, property or safety of us, our users, employees, minors, members of the public and/or our Platform.

We may also disclose information about you to our auditors or legal advisors in conjunction with accessing our disclosure obligations and/or rights under this Policy.

Types and disclosures of aggregate information

We may share aggregated information concerning our users, without attribution of Personal Information, to other companies with whom we conduct business. In other words, we may combine your anonymized data with those of all or a particular group of our users to prepare collective profiles of our users and their activities for our internal use and can share the same with our partners. Such information allows us to continue to grow and provide you with quality information through higher quality product development, more relevant partnerships, and more accurate marketing and advertising of the Platform. For example, we may use and/or share the following:

- Tracked number of our users who view certain pages or use certain features.
- Compiled total dollar amount of sales conducted through the Platform in a particular geographic region.
- Tracked purchasing trends.
- Tracked user demographics, behavior and page views.

What do we do to keep your Personal Information secure?

We take commercially reasonable security measures to protect against unauthorized access to, or unauthorized alteration, disclosure or destruction of your Personal Information that you share and we collect and store. These security measures include practices such as:

- Keeping sensitive or Personal Information on a secured server behind a firewall.
- Internal reviews of our data collection practices and platforms.

Information relating to credit card purchases are not stored on our servers. They are processed through a third party supplier and the information supplied is subject to their policies.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information: (a) there are security and privacy limitations of the Internet which are beyond our control; (b) the security, integrity and privacy of any and all information and data exchanged between you and us through this Platform cannot be guaranteed and you transmit such information at your own risk; and (c) any such information and data may be viewed or tampered with in transit by a third party.

What can you do to protect your Personal Information?

While we are committed to taking all reasonable precautions to protect your Personal Information, there are steps you can take as well when using online services, such as ours:

- Use only secure websites when disclosing information.
- Create strong passwords and use them wisely (e.g. don't use the same password for us that you use for your bank, for example).
- Never respond to unsolicited requests for social security number or financial information.
- Do not disclose passwords to the Platform or Account Information to any other person.
- If logins are required for site access, be sure to sign off when finished using a shared computer.
- Be careful about disclosing personal information such as name, address, or e-mail address in discussion forums or other public areas of the sites. Any information disclosed in public user communication, can be collected and used by third parties and may result in unsolicited messages from third parties.
- Only upload photos and other public information if it is appropriate for such information to become public under the circumstances.

Be aware when clicking on hypertext links and third party advertising, if any, on the Platform. Other sites accessible through our Platform, if any, via links or service partnerships have their own privacy policies and data collection, use and disclosure practices. We encourage you to review other websites' policies before revealing any sensitive or personal information. Additionally, if other companies place advertising on our Platform, they may collect information about you when you view or click on their advertising through the use of cookies. You should contact these advertisers directly if you have any questions about their use of the information that they collect. We cannot be and are not responsible for maintaining your privacy once you leave our Platform and are not responsible for the policies or practices of third parties.

What can you do if you no longer want to receive communications from us?

You can opt out of any automated notifications or communications by:

- Following the instructions included with each email.

If we have provided any third party with your Personal Information (with your permission) and you subsequently opt-out, you will have to contact the third-party directly with your opt-out request(s).

Fair Information Practice Principles

The FTC created the Fair Information Practice Principles as a result of the Commission's inquiry into the manner in which online entities collect and use personal information and safeguards to ensure that such practices are fair and provide adequate privacy protection. We take our own self-regulation very seriously and support your rights as a consumer to causes of action against disreputable and unprincipled data collectors and users. Consistent with the FTC's Principles, and in the event of a data breach, we will do the following:

- Notify users by posting a notice on our Platform within 5 business day(s)

California Residents - California Civil Code Section 1798.83

California residents have the right to receive: a) information identifying any third party company(ies) to whom we may have disclosed (within the previous calendar year) personal information pertaining to you and your family for that company's direct marketing purposes; and b) a description of the categories of personal information disclosed. If you are a California resident and wish to obtain such information, submit a request to our email address found at the end of this Policy with "Request for California Privacy Information" as the subject line and in the body of your message. Please be aware that not all information sharing is covered by requirements and only information on covered sharing will be included in our response.

How can you update, delete, or correct your personal information?

We believe you should have the ability to access, edit, and delete the Personal Information that you have provided to us and encourage you to promptly update your Personal information if it changes. You may change any of your Personal Information in your Account online at any time by:

- Logging in in accordance with instructions posted elsewhere on this Platform.

Children's Online Privacy Protection

Our Platform is not designed or intended for use by children under 13. If you are under 18, you should use the Platform and Services only with involvement of a parent or guardian. Children under 13 may not submit any personally identifiable information to us, and if we discover that we have inadvertently gathered any such information from a child under 13, we will take appropriate steps to delete it. If you are the parent or guardian of a person under the age of 13 who has provided personally identifiable information to us, please inform us by contacting us at support@theculinaryexchange.com and we will remove such information from our database. If you are concerned about your children's use of the Platform, you may use web-filtering technology to supervise or limit access to the Platform. Visit www.OnGuardOnline.gov for tips from the Federal Trade Commission on protecting kids' privacy online.

How we comply with the CAN-SPAM Act

The CAN-SPAM Act is US legislation that regulates commercial emails with strict penalties for those who send emails with materially false or misleading content or fail to provide recipients of commercial emails with an opportunity to decline them. We only collect your Personal Information for the purposes which we outlined in this Policy and we will do the following:

- NOT use false or misleading information in the subject line or body of our emails.
- Identify messages as advertisements by using the label "advertisement" in a conspicuous manner.
- Monitor third party email marketing services, if one is used.
- Label any adult content in the subject line of our emails as "ADULT".
- Provide accurate "From" fields so that users know who is sending the email.
- Provide visible and operable unsubscribe mechanisms in all of our emails.
- Include our physical address in the body of our emails.
- Honor any opt-out requests to our emails within 10 business days.
- Refrain from using harvested email addresses.

You may contact us at the email below if you would like to unsubscribe from our marketing communications at any time.

What will happen if we change this Policy?

We may update this Policy from time to time and in our sole discretion. Use of information we collect now is subject to the Policy in effect at the time such information is used. This is how you will be notified if we make any material changes to our Policy:

- We will post a notice on this Platform.
- We will post an updated Policy with a more recent effective date in the header.

We encourage visitors to frequently check this page for any changes to this policy. If you continue to use the Platform or the Service after changes become effective, you agree to abide by and be bound by the modified privacy policy.

How can you contact us?

If you have any questions about this Privacy Policy, the practices of this Platform, or your dealings with this Platform, please contact us via the following:

- By email at support@theculinaryexchange.com