

Muncho Privacy Policy

Effective date: October 12, 2023

At Muncho, safeguarding your privacy is our priority. Familiarize yourself with the details below to understand our approach to handling your personal data. By engaging with our Services, you recognize and agree to the terms described in this Privacy Policy, granting us permission to gather, process, and distribute your information as specified.

Always note that when using Muncho's Services, you're also bound by our Terms of Use, which includes this Privacy Policy. Any undefined terms in this Policy are clarified in our Terms of Use.

Overview

This Privacy Policy details our handling of Personal Data obtained when you engage with our Services. Here, "Personal Data" refers to any information associated with or identifying an individual, often termed as "personally identifiable information" or "personal information" under relevant data protection laws and guidelines. The policies of entities not owned or directed by us, or individuals not under our supervision, are not included within this Privacy Policy.

How We Obtain Your Personal Data

We gather your Personal Data from the following sources:

Directly from You:

- When you voluntarily share such information with us, and
- As a result of your engagement with our Services when certain Personal Data is automatically recorded.

From Third Parties ("Third Parties") who share information about you with us, such as:

- Service providers. For instance, we may collaborate with analytics providers to understand your interactions with our Services, or other third parties might aid us in offering customer support.
- Linked social media. If you link your social media accounts with our Services or log in through a third-party platform, be aware that some details or content from those accounts might be integrated into your account with us.
- Marketing allies. Some of our service providers who support our marketing and promotional endeavors share insights about your interactions with our web platforms, apps, products, services, advertisements, or communications.

Types of Personal Data We Gather

Below is a list specifying the types of Personal Data we've accumulated, both currently and in the previous twelve (12) months. In subsequent sections of this Privacy Policy, we will refer to these types using labels such as "Category A. Personal Identifiers".

Category	Personal Data Collected	What we collect?
A.	Personal identifiers Examples: Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number or other similar identifiers.	We gather information when users make purchases (even if checking out as a guest) or when they establish or modify their Muncho profiles. This can encompass details like their full name, email address, contact number, username and password, residential address, profile image, as well as financial details (alongside associated payment verification data).
B.	Customer records identified by state law (including the California Customer Records statute (Cal. Civ. Code § 1798.80(e)))Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number or any other financial information, medical information or health insurance information.	We collect details such as full name, residential address, contact number, educational background, and credit or debit card numbers. From our restaurant affiliates, we gather business-related data and bank account details.
C.	Protected classification characteristics under state or federal law Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status or genetic information (including familial genetic information).	Age, gender
D.	Commercial information Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	We might record and monitor your order history. From our restaurant partners, we gather details like business name, address, banking specifics, and local network data. However, such business information is not

	containing histories or tendencies.	However, such business information is not collected from individual customers.
E.	Biometric information Examples: Genetic, physiological, behavioral, and biological characteristics or identifying activity patterns, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health or exercise data.	We do not collect this category of Personal Data.
F.	Internet or other similar network activity information Examples: Browsing history, search history, or information on a consumer's interaction with a website, application or advertisement.	We may gather details on a user's interactions with Muncho's offerings, such as browsing, purchasing, and search histories, as well as any other engagements with our websites or applications. However, we do not capture information related to or stemming from a user's interactions with products from other companies.
G.	Geolocation data Examples: Physical location or movements.	We collect your physical location while you are using the application and websites via GPS and IP address
H.	Sensory data Examples: Audio, electronic, visual, thermal, olfactory or similar information.	We do not collect this category of Personal Data.
I.	Professional or employment-related information Examples: Current or past job history or performance evaluations.	We do not collect this category of Personal Data.
J.	Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)) Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information or student disciplinary records.	We only collect what you submit to us, which may include your place of education and graduation year.
K.	Inferences drawn from other personal information Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.	We may collect information about your usage of the Muncho website or app, including purchase and gift giving habits.
L.	Age or date of birth	We may collect your date of birth and age if you choose to give it to us.
M.	Device Data	We might gather information related to the devices you use to access our services. This includes details such as hardware models, unique device identifiers or IP addresses

		unique device identifiers or IP addresses, operating system types and versions, software, language preferences, advertising IDs, data on device movements, and cellular network information.
N.	Communications Data	Users can interact with each other and with Muncho via our mobile apps and websites. For instance, we facilitate communication between users, delivery personnel, and those receiving orders, allowing them to call, text, or share files without revealing their phone numbers to one another. To offer this feature, Muncho captures certain details about these interactions, such as the timing and content of the communications. We might utilize this data for customer assistance (including settling user disputes), ensuring safety and security, enhancing our services, and for analytical purposes.
O.	Contacts List	With user consent: We transfer users' contact details to Muncho's servers, allowing users to identify and engage with friends who are already Muncho users when the app is active.
P.	Camera	With the user's consent, we may access the device's camera to scan and store credit card details for transactions. The camera can also be utilized to take profile images.
Q.	User Content	When users reach out to Muncho's customer support, submit ratings or praises for fellow users, restaurants, or merchants, or contact Muncho in any capacity, we gather the information they provide. This could encompass feedback, images, and any audio or video recordings shared by users for customer support purposes. Additionally, we collect metadata associated with the way you communicate with Muncho.

More About How We Collect Your Personal Data

Automated Data Collection

Our Services employ cookies and related technologies like pixel tags, web beacons, and JavaScript, collectively referred to as "Cookies." These allow our servers to identify your browser, track your interaction with our Services, analyze user patterns, and refine our offerings.

Cookies are tiny data bits, mostly text, stored on your device when you access our Services. We might also integrate the data we gather with information from third parties, which might have placed their own Cookies on your devices. Presently, our use of Cookies means we do not recognize “Do Not Track” browser requests.

We deploy various Cookies:

1. **Essential Cookies:** Crucial for certain features or services you request. For instance, they allow access to secure parts of our services. Disabling them might limit some functionalities.
2. **Functional Cookies:** Remember your Service-related choices and settings. They let us tailor our content, remember preferences like language, and recognize return users.
3. **Performance/Analytical Cookies:** Help us understand user behavior on our Services, like page views or visitor numbers. They also measure our ad campaign efficiency. We might use tools like Mixpanel or Looker for device metrics and analytics.
4. **Retargeting/Advertising Cookies:** Track online activity to provide more relevant advertisements. More details are in the section “Information about Interest-Based Advertisements.”

You can manage Cookie preferences in your browser's settings. Most browsers let you disable Cookies or decide on their acceptance. Deleting Cookies might mean manually resetting some preferences during subsequent visits, potentially hindering some functionalities.

For a deeper dive into Cookie management and deletion, please visit

<http://www.allaboutcookies.org/>.

About Interest-Based Advertisements:

We might display advertisements and permit third-party advertising networks, including agencies, technology vendors, and research entities, to showcase ads via our Services. These ads might be oriented towards users matching specific profiles or showcasing certain behaviors or preferences ("Interest-Based Ads"). The data behind these ads, which might include Personal Data, can be sourced from user activity on our Services, third-party services, or provided by you. This tracking could span various services and times, even after you exit our Services.

To facilitate this, we or our partners might use Cookies and web beacons – files from ad networks delivered through our Services. These beacons aid in anonymous, aggregate research, reporting, and ad targeting. They also let these networks present tailored ads to you on different platforms. Such beacons enable these ad networks to interact with or set their Cookies on your browser, similar to accessing a webpage from their domain.

We adhere to the Digital Advertising Alliance’s (“DAA”) guidelines for Online Behavioral Advertising. Alongside the Network Advertising Initiative (“NAI”), multiple marketing and media bodies have devised a self-regulation strategy to give users a clearer picture and greater

management over behavior-driven ads spanning various online platforms. For choices about Interest-Based Ads, including opt-out options from certain behavioral ads, please visit the DAA' s or NAI' s opt-out pages at <http://www.networkadvertising.org/choices/> or www.aboutads.info/choices.

Utilization of Your Personal Data

We leverage your Personal Data to improve, enhance, comprehend, personalize, and administer our Services.

Your Personal Data aids us in:

- Addressing the intent for which you shared the information.
- Engaging with you about our Services, including announcements, updates, or opportunities.
- Offering support and help related to our Services.
- Establishing and overseeing your Account or user profiles.
- Customizing content and communications based on your inclinations, inclusive of relevant offers and ads.
- Handling orders or other transactions.
- Addressing user queries and meeting their requests.
- Refining and expanding our Services through research, testing, analysis, and innovation.
- Safeguarding against illicit, harmful actions, ensuring our Services' security and integrity.
- Meeting legal, contractual duties, settling disputes, and upholding our [Terms of Use](#).
- Adhering to law enforcement and other mandatory legal, regulatory directives.
- Other professional objectives disclosed during data collection or as mandated by data protection regulations like the California Consumer Privacy Act (CCPA).

We won't gather new Personal Data categories or utilize previously gathered data for substantially divergent or unrelated aims without notifying you.

Should you provide communication means, such as an email address, we may reach out with promotional offers or updates regarding Service usage. For instance, email openings can be confirmed by us to refine our Services. If you'd rather not receive our communications, kindly communicate your preference to info@muncho.io.

Handling and Disclosure of Your Personal Data

Business-Related Disclosures of Personal Data

We collect and upload users' Phone Number information via Unionpay SDK.

For specific operational purposes, we share your Personal Data with service providers and relevant entities:

- Auditing linked to ongoing interactions and related operations, such as counting unique ad viewers, validating ad placements, ensuring ad impression quality, and ensuring adherence to guidelines and standards.
- Detecting and counteracting security breaches, malicious or deceptive actions, and pursuing perpetrators of such activities.
- Debugging to pinpoint and rectify issues affecting the intended functionality.
- Brief, immediate usage of Personal Data, ensuring it's not employed by third parties for constructing consumer profiles or modifying your user experience beyond the current transaction.
- Delivering services, including account management, order processing, customer support, payment processing, marketing and advertising services, analytics, and other similar functions.
- Engaging in research for tech enhancement and demonstrations.
- Activities that ensure or improve the quality or safety of our services or devices that we own, have produced for us, or oversee.

Data acquired via our short code program remains confidential and isn't shared with third parties for marketing purposes.

Your Personal Data is shared with the following entities:

- Service providers, encompassing:
 - Payment handlers.
 - Food service integration platforms, including restaurant POS vendors.
 - Ad consortiums.
 - Security and fraud prevention experts.
 - IT and communication providers.
 - Data analytics companies.
 - Temporary staffing and contract professionals.
- Entities that may gain access to your Personal Data through business transitions, like mergers or acquisitions.
- Other entities based on your guidance, such as:
 - Other users (if you share information publicly or for transaction purposes).
 - Social media platforms (if actively engaged through our Services).
 - Third-party business allies accessible via our Services.
 - Any other party you grant permission to.

In the past year, we've shared these categories of your Personal Data for operational reasons:

- A. Personal identifiers.
- B. Customer records identified by state law.
- C. Protected classification characteristics under state or federal law.
- D. Commercial information.
- F. Internet or other similar network activity information.
- G. Geolocation data.
- J. Non-public education information.
- K. Inferences drawn from other personal information.
- L. Age or date of birth.

In this section, we employ the term 'sell' as articulated by the CCPA. We might share your Personal Data with third-party entities, including analytics providers, to facilitate our Muncho services. Although we don't receive financial compensation from our analytics partners, such sharing might be interpreted as a 'sale' under relevant privacy regulations. We sell your Personal Data, but you retain the right to decline such sales (refer to the “Your Rights” segment below for opt-out details).

In the previous year, the categories of your Personal Data we've sold to third parties include:

- A. Personal identifiers.
- B. Customer records identified by state law.
- C. Protected classification characteristics under state or federal law.
- D. Commercial information.
- F. Internet or other similar network activity information.
- G. Geolocation data.
- J. Non-public education information.
- K. Inferences drawn from other personal information.
- L. Age or date of birth.

Protecting and Storing Your Personal Data

We prioritize safeguarding your Personal Data against unauthorized access, usage, and disclosure by implementing suitable physical, technological, organizational, and administrative security protocols based on the nature of the Personal Data and our processing methods. It's essential that you also contribute to the security of your data, such as by choosing strong passwords, limiting device and browser access, and ensuring you log out after using your

account. While we are committed to data protection, complete online data security isn't guaranteed. Except where mandated by law, we aren't liable for any unintended disclosure, theft, loss, or damage to your information.

Children's Personal Data

As highlighted in our Terms of Use, we intentionally avoid collecting Personal Data from children under 16. If you're below this age, please refrain from registering or using our Services or sending any Personal Data. If we become aware of collecting data from someone under 16, we'll promptly delete it. If you suspect a child under 16 has shared data with us, please inform us at info@muncho.io.

Rights of California Residents

For those residing in California, you're entitled to the rights explained in this section. For guidance on exercising these rights, refer to the subsequent “Exercising Your Rights” section. In case of discrepancies between this section and other Privacy Policy provisions, the more data-protective clause prevails for California residents. Queries can be directed to info@muncho.io.

Access

You can request details about our Personal Data collection and usage over the past year. We'll disclose:

- Categories of Personal Data collected.
- Origins of the collected Personal Data.
- Our purpose for collecting or selling your Personal Data.
- Third parties with whom we've shared your Personal Data.
- Specific pieces of your Personal Data collected.

If your Personal Data has been shared for business reasons in the past year, we'll list the types of data shared with each third-party category.

If we sold your Personal Data within the last year, we'll indicate which categories were acquired by each third-party category.

Deletion

You can request the deletion of your Personal Data. Under the CCPA, exceptions exist: for instance, retaining your Personal Data might be necessary for service provision or to finalize a requested action. If such exceptions apply, we might refuse your deletion request.

Exercising Your Rights

For exercising the above rights, your request should: (1) verify your identity based on the collected Personal Data, and (2) sufficiently detail your request. A request meeting these conditions is deemed a “Valid Request.” We might not address incomplete requests. Personal

Data from a Valid Request will only verify your identity and address your request. An account isn't necessary for a Valid Request.

We aim to address Valid Requests within 45 days of receipt. While typically free, excessive or unfounded Valid Requests might incur fees. If applicable, we'll inform you of the fee and its justification before addressing your request.

Valid Requests can be sent to our email: info@muncho.io.

Opting Out of Personal Data Sales

You reserve the right to decline the sale of your Personal Data.

Commitment to Fair Practices

Exercising your rights under the CCPA won't subject you to discriminatory treatment by us. Specifically:

- We won't withhold our products or services.
- We won't modify the prices or rates you're charged.
- We won't offer you a diminished quality of goods or services.

Nevertheless, in compliance with data privacy laws (including the CCPA), we might offer varied Service tiers, which may have differential pricing, quality, or rates. These differences correspond to the value of the Personal Data we obtain from you.

Additional State-specific Privacy Rights

For California Residents:

Pursuant to California Civil Code Sections 1798.83-1798.84, residents of California have the right to request that we avoid sharing Personal Data with third parties for those parties' direct marketing objectives. For such requests, reach out to us at info@muncho.io.

For Nevada Residents:

If you reside in Nevada, you can opt-out from the sale of certain Personal Data that may be sold or licensed to third parties. To exercise this right, contact us at info@muncho.io with "Nevada Do Not Sell Request" in the subject line. Please provide your name and associated account email address.

Updates to the Privacy Policy

As we continually aim to enhance our Services, this Privacy Policy may require periodic updates. We'll notify you of significant changes by posting a notice on the Muncho.co website, emailing you, or other suitable methods. If you have decided against receiving legal notice emails from us (or if we don't have your email address), you're still bound by these notices. Using the Services

post modifications indicates your consent to the updated Privacy Policy. The application of collected information adheres to the Privacy Policy active at the time of collection.

Get in Touch:

For queries or remarks about this Privacy Policy, or if you'd like to discuss our collection and use of your Personal Data, or any associated rights, kindly reach out to us at:

info@muncho.io.

Xiaocun, Inc.