

Privacy Policy

Last Updated: September 23, 2023

This privacy policy (this “**Policy**”) explains how personal information is collected, used, and disclosed by Gala Restaurant , and its parent (collectively, “**Gala**” “**we**,” “**our**” or “**us**”). This Policy applies to visitors and users (individually, “**you**”) of Gala’s websites, applications, and other online services (each, a “**Site**,” and collectively, our “**Sites**”), although not all services described here are available in all jurisdictions. By visiting or using our Sites, to the extent permitted by applicable law, you are consenting to us gathering and processing information about you in accordance with this Policy, although consent may not be required for all of the elements described in this Policy. For particular types of information or processing, we may provide you with choices or request your further consent related to what information we collect and how we may process it. Third parties (such social networks other online applications that you use in connection with our Sites) may also collect, use, and share information about you. This Policy does not cover such third parties or their services and we do not take any responsibility for how such third parties may use any information they collect. For information about third-party privacy practices, please consult with them directly.

I. INFORMATION WE COLLECT

Personal Information. By visiting or using our Sites, we may collect the following categories of personal information (“**Personal Information**”) you provide to us: name; email address; postal address; phone number (including your mobile phone number); other information you provide on our Sites; and other information you may provide about yourself or others to our Sites or to which you provide us with access via from third-party websites, applications, and services (each, a “**third-party platform**”). We may combine this information with information we collect on our Sites.

Device Information. When you visit our Sites, some information is automatically collected from devices (e.g., mobile, computer, laptop, tablet) used to visit or use our Sites including, but not limited to, operating system, settings, and other data about your device that we use to provide the services or as otherwise described in this Policy (“**Device Information**”).

II. HOW WE USE YOUR INFORMATION

Purposes. We may use your Personal Information to provide you with the information, products, or services that you have requested and, if applicable, charging you for the products or services you have ordered. We will share your Personal Information with third parties only in the ways that are described in this privacy policy. We do not sell your Personal Information to third parties. We may use Personal Information to provide important notices regarding our products and services. We may use Personal Information for internal purposes such as helping use develop, deliver, and improve our products, services, content, and advertising. We may also enlist third parties to collect, store, process and manage Personal Information for Gala. The service providers with



whom we conduct business are authorized to use Personal Information only to perform the service for which they are hired. When we use other companies to perform services on our behalf, we will require that such companies protect your Personal Information consistent with this Privacy Policy.

In addition, from time to time, we may offer you the opportunity to receive information, products, or services directly from a third-party. If you elect to receive such items, we may share your Personal Information as necessary to facilitate your request to receive items from any such third-party.

We may process or store your Personal Information in our systems and databases located in the United States or any other country where Gala operates. We may disclose Personal Information when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating our web site terms and conditions or other agreements with Gala, causing injury to or interference with (either intentionally or unintentionally) our web site, products, services or other rights or property. We may disclose Personal Information when we believe in good faith that the law requires it, such as a subpoena and for other governmental administrative, regulatory or law enforcement purposes.

If Gala is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Combined Information. We may combine your Personal Information with Device Information and location information (with your consent, where required) to serve you specifically, such as to deliver a product to you according to your preferences or restrictions, or for advertising or advertising targeting purposes. When we combine Personal Information with Device Information in this way, we treat it as, and apply all the safeguards in this Policy applicable to, Personal Information.

Electronic Communications. Consistent with the above Purposes, we may communicate with you via electronic messages, including email, text message, or mobile push notification to, example: for send you information relating to technical notices, updates, security alerts, and support and administrative messages; and/or, subject applicable law, communicate with you about contests, offers, promotions, rewards, upcoming events, and other news about products and services offered by Gala, our parent companies, our subsidiaries, our affiliates, restaurants, and other business partners.

Aggregated Information. We may aggregate information collected from you and other users as well as Device Information and location information (with your consent, where required) to produce general statistics that cannot be linked to you or any other specific

user and with which we attempt to provide you with a better experience, to improve our services, and to analyze and understand how our Sites and products are used.

Retention. We will retain your information for the period necessary to fulfill the Purposes outlined in this Policy and as otherwise needed to comply with applicable law and internal company policies.

III. HOW WE SHARE YOUR INFORMATION

Financial Information. In connection with conjunction with purchasing certain Gala products and services, Financial Information consisting of financial qualifications and billing information may be required. Examples include a customer's billing name and address and credit card number. Except as explicitly stated at the time we request the information, or as provided in Gala's website or Subscription Agreement, as may be applicable, we do not disclose to third parties the Financial Information provided. All Financial Information that we collect through the website is used solely to check the qualifications of prospective customers and to bill for the products or services. Such information is not used by Gala for marketing or promotional purposes. Gala uses a third-party intermediary to manage the credit card processing. This intermediary is solely a link in the distribution chain, and is not permitted to store, retain, or use the information provided, except for the sole purpose of credit card processing (we do not retain credit card numbers).

Information You Share Socially. Our Site offers publicly accessible social media platforms. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your Personal Information from our social media sites, contact us at privacy@galassb.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

Our Sites may also allow you to connect with us on, share on, and use third-party platforms, including those on which Gala has a presence.

Please be mindful of your personal privacy needs and the privacy needs of others as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. Gala also does not control the privacy practices of third-party platforms. Please contact those sites and services directly to learn about their privacy practices.

Demo Request/Referrals. If you choose to request a demo from us and fill out the form for the best contact person at your organization about the demo request, we will ask you for your contact's name, email address, phone number. We can get you in touch with a team member that can help learn about the specifics of your demo. Gala stores this information for the sole purpose of contacting you. Your contact person may contact us at privacy@galassb.com to request that we remove this information from our database.

Testimonials. We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at privacy@galasb.com

IV. SECURITY OF YOUR INFORMATION

We use a variety of security technologies and procedures to help protect your Information and the information on our Platforms from unauthorized access, use, or disclosure. For example, we store the Information you provide on computer systems with limited access, which are located in controlled facilities. We use a two-factor authentication for signing-in and when we transmit highly confidential information (such as a credit card number or password) over the Internet, we protect it through the use of encryption, such as the Secure Socket Layer (SSL) protocol. Gala cannot, however, ensure or warrant the security of any information you transmit to us by e-mail or via other web sites, and you do so at your own risk.

Please remember that you play a valuable part in security as well. Your password to access our website or On-line Services, which you select at registration, should never be shared with anyone and should be changed frequently. Remember that any information you voluntarily disclose on-line in any news or message postings, discussion groups or chat rooms may be collected and used by others without your permission. Furthermore, if you provide any information to parties who operate websites that are linked to or from our website you may be disclosing your Information, and different rules may apply to their collection, use or disclosure of your Information. See below "VIII. LINKS TO OTHER WEBSITES" for additional information.

If you have been given the option to open an account on this Site that will provide you with access to password protected portions of the Site and you elect to do so, you must complete the registration process by providing us with current, complete and accurate information as prompted by the applicable registration form, and choose a password and user name. You are entirely responsible for maintaining the confidentiality of your password and account and for any and all activities that occur under your account. You agree to (a) immediately notify Gala of any unauthorized use of your account or any other breach of security of which you become aware, and (b) exit completely from your account at the end of each online session. Gala will not be liable for any loss that you may incur as a result of someone else using your password or account, either with or without your knowledge. However, you could be held liable for losses incurred by Gala or another party due to someone else using your account or password. You may not use anyone else's account at any time.

While we strive to protect your information by employing reasonable internet security methods and practices, we cannot ensure the security of any information you transmit to us over an unsecured Internet connection. If you have any questions about our security please contact us at privacy@galasb.com.

V. COOKIES AND OTHER TRACKING TECHNOLOGIES

We collect information about your usage and activity on our Sites using certain technologies, such as: cookies, web beacons, and other technologies. Third-parties may also view, edit, or set their own cookies. We and our third-party service providers, advertisers, and/or partners may also place web beacons for such third parties. The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this Policy, except as required by law.

VI. OPTING OUT

If you do not want to receive marketing and promotional emails from, Gala you may click on the “unsubscribe” link in the email to unsubscribe and opt-out of marketing email communications. Alternatively, to the extent that applicable law requires your prior opt-in consent to receive marketing and promotional emails, you can choose not to opt-in. We will try to comply with your request as soon as reasonably practicable as required by applicable law. Please note that we may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by applicable law. In addition, please note that even if you opt-out of receiving marketing communications from one or all of our Sites, we may need to send you service-related communications and may need to keep information we have collected about you for record-keeping, research, and other purposes.

VII. ACCESS AND CORRECTION OF YOUR INFORMATION

If you have created an online account with us and would like to update the information you have provided to us, you can access your account to make changes or corrections to your information or contact us at privacy@galassb.com.

VIII. LINKS TO OTHER WEBSITES

Our Sites may contain links to other websites or services that are not owned or controlled by Gala including links to websites of restaurants and our advertisers, sponsors, and partners. This Policy only applies to information collected by our Sites. We have no control over these third-party websites, and your use of third-party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any third-party websites linked to our Sites. Your use of third parties' websites linked to our Sites (**“Linked 3rd Party Websites”**) is at your own risk, so we encourage you to read the privacy policies of any these Websites when you leave one of our Sites. Here are links to the privacy policies of the Linked 3rd Party Websites:

- <https://www.opentable.com/legal/privacy-policy>
- https://aws.amazon.com/privacy/?nc1=f_pr
- <https://www.zendesk.com/company/customers-partners/privacy-policy/>
- <https://stripe.com/privacy-shield-policy>
- <https://www.salesforce.com/company/privacy/>

IX. CHANGES TO THIS POLICY

Except to the extent limited by applicable law, we reserve the right to update this Policy to reflect changes to our information practices by prominently posting notice of the update on our Sites, and as required, obtaining your consent. Any updates will become effective immediately after posting the updates to this Policy and apply to all information collected about you, or where required, upon your consent. You agree that you will review this Policy periodically. If we make any changes to this Policy, we will change the “Last Updated” date above. You are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using our Sites. **If you do not agree to the terms of this Policy or any modified version of this Policy, your sole recourse is to terminate your use of our Sites.** If we make any changes to this Policy that materially impacts previously collected information about you, we will obtain your prior express consent.

X. CHILDREN

Gala’s web sites are not directed at individuals less than thirteen (13) years of age, and Gala does not intend to collect any Personal Information from such individuals, unless otherwise stated at the time such information is collected. If a child under 13 submits Personal Information to Gala and we learn that such Personal Information is the information of a child under 13, we will attempt to delete the information as soon as possible.

XI. OPTING IN

If you reside in the U.K. or E.U., before submitting any Personal Information, you must first “opt in” and accept the terms and conditions of this Policy. To opt in and accept such terms and conditions, please check the box located on the Site near where you will input Personal Information.

XII. CALIFORNIA PRIVACY NOTICE

This California Privacy Notice (“Notice”) is for California residents and supplements Gala’s Privacy Policy. It explains how we collect, use, and share your Personal Information and how to exercise your rights under the California Consumer Privacy Act (“CCPA”).

When we say “Personal Information” in this Notice, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is aggregated or information that cannot be reasonably linked to you.

How we collect, use, and share Personal Information

To provide the products or features offered by Gala (“Products”), we must process information about you, including Personal Information, whether or not you are registered or logged in. Subject to the limitations we describe in the Gala Privacy Policy,

we may share your Personal Information for business purposes with strict restrictions on how our partners can use and disclose the data we provide, at your direction, or in ways otherwise in accordance with the CCPA. Gala does not sell any Personal Information to third parties, but may share your Personal Information with service providers and other entities for business purposes consistent with the CCPA. The categories of personal information Gala has collected about California consumers, during the preceding 12 months, including the categories, sources from which that information was collected, the business or commercial purpose for which it was collected, and the categories of third parties with whom the information was there shared is set forth above under the following sections: I. INFORMATION WE COLLECT; II. HOW WE USE YOUR INFORMATION; and III. HOW WE SHARE YOUR INFORMATION.

Sources of Personal Information

We receive Personal Information from the information that you and others provide, from your device(s), and from our partners. The categories of sources from which we've collected or received Personal Information include:

- **You:** We collect the content, communications, and other information you provide when you use our Products, including when you sign up for an account, create or share content, and message or communicate with others. We collect information about the people, pages, accounts, hashtags, and groups you are connected to, and how you interact with them across our Products, such as the people you communicate with the most or the groups you are part of. We also collect information about how you use our Products, including ads we serve on and off our Products, such as the types of content you view or engage with, the features you use, the actions you take, the people or accounts you interact with, and the time, frequency, and duration of your activities.
- **Other people:** We may also receive and analyze content, communications, and information about you that other people provide when they use our Products, such as when others share or comment on a photo of you, send a message to you, or upload, sync, or import your contact information.
- **Your device(s):** We collect information from and about the computers, phones, connected TVs, and other web-connected devices you use that integrate with our Products, and we combine this information across different devices you use.
- **Partners, vendors and third-parties:** Advertisers, app developers, and publishers and other partners can send us information for business purposes through the they use. We also receive information about your online and offline actions, and purchases from third-party data providers who have the rights to provide us with your information. Partners receive your data when you visit or use their services or through third parties they work with. We require each of these partners to have rights to collect, use, and share your data before providing any data to us. We also receive information from publicly available sources, research institutions and professional and non-profit groups.

How can you exercise your rights provided under the CCPA?

Under the CCPA, you have the following rights:

- **Right to Know:** You have the right to request that we disclose to you the Personal Information we collect, use, or disclose, and information about our data practices;
- **Right to Request Deletion:** You have the right to request that we delete your Personal Information that we have collected from you;
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of these rights.

To exercise your “right to know” or your “right to request deletion,” email privacy@galasb.com.

Please note that to protect your information and the integrity of our Products, we may need to verify your identity before processing your request. In some cases, we may need to collect additional information to verify your identity, such as a government issued ID.

Under the CCPA, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. In most cases, we will facilitate your request through automated tools available through your password-protected account.

For information on the CCPA requests we have received, please email us at privacy@galasb.com.

XIII. CONTACT US

If you have any questions about this Policy or information we have collected about you, please contact us by email at privacy@galasb.com or by postal mail at:

Gala Restaurant
705 Anacapa St.
Santa Barbara, Ca. 93101
Attention: Privacy Policy Department