

RTI Privacy Policy

Total Operations Management (TOM)

Restaurant Technologies, Inc. believes privacy and protecting data are core aspects of trust in today's technology world. We take our own data protection commitment to you and your customers very seriously. We are acutely aware that we need to earn and maintain your trust on a daily basis.

RTI respects the privacy of our affiliates, customers, and visitors to our Total Operations Management Website: www.rtitom.com. While offering our website users the advantages and convenience of web-based technologies, we also strive to employ practices that ensure information collected about affiliates, customers, and visitors is used conscientiously and appropriately.

This Privacy Policy outlines the use of personally identifiable information collected on the Website. This Privacy Policy does not encompass other websites referenced by us in print, online, or in e-mail.

Your Acceptance:

This Privacy Policy applies to RTI's Total Operations Management Website: www.rtitom.com (the "Website"). This Privacy Policy describes the information we collect on the Website and how we use it, the choices you can make about your information, and how we protect your information. By using and/or visiting www.rtitom.com including all Content (as defined in the [Terms of Service](#)) available through the website (as defined in the Terms of Service), you confirm that you have read and understood the terms of this Privacy Policy.

Information That We Collect and How We Use It:

Web servers may automatically capture information from visitors to the Website, such as the name of the domain and host from which you access the internet, the internet address of the website from which you enter the Website, your operating system, the pages you visit on the Website, whether you have been to the Website before, the time and date of your visit, and the amount of time you spend on the Website. This visitor information may be used to improve the Website.

We may also use a third party tool to assist us in analyzing this data to better tailor our Website. Visitors are not tracked across multiple sites by this tool.

Cookies

A cookie is a small text file that the Website can place on your computer's hard drive. When you visit the Website, a cookie may be placed on your computer for customizing and enhancing your experience on the Website. The cookie may track whether you are logged in or not. It may also track your identity when you navigate between pages on the Website. The cookie also enables the "Remember Me" functionality. Your name and email address are not shared in this cookie. We use a cookie that collects anonymous traffic data to optimize the functionality of the Website,

to help us understand how the Website is used, and to provide users with interest-based content or advertising based upon their browsing activities and interests. You can set your Web browser to block cookies, but doing so may affect your ability to access certain features of the Website.

Browsing Information

Web servers may automatically capture the following information from visitors to the Website, including the name of the domain and host from which you access the internet, the internet address of the Website from which you enter the Website, your operating system, the pages you visit on the Website, whether you have been to the Website before, the time and date of your visit, and the amount of time you spend on the Website. This visitor information may be used to improve the Website. We may also use a third party tool to assist us in analyzing this data to better tailor our website. Visitors are not tracked across multiple sites.

Account Registration, Contact Us Form and Request Service Form

We collect any personal information you submit to us in connection with registering for an account and using the Contact Us and Request Service forms, including, but not limited to, your name, phone number, fax number, and email address. We generally do not encourage the submission of any other personally identifiable information in connection with these forms and are not responsible for keeping private information submitted in connection with contact us and request service forms beyond what is requested.

We use the personal information collected from you for creating your account, creating a profile for you, responding to your inquiries and requests, and otherwise communicating with you.

What We Do With Your Information:

We will not voluntarily share your information provided via the Website to any third party, except with third parties that we hire to perform services for us. These third parties only have access to the personal information they need to perform those services. They are required to keep your personal information confidential and may not use it other than as we ask them to and always in accordance with this Privacy Policy.

We will also share you information in the following circumstances:

- With third parties that perform services for us;
- To comply with legal requirements, such as law, regulation, warrant, subpoena, court order, or with a regulator or law enforcement agency or personnel;
- When we believe in good faith that disclosure is necessary to prevent harm or injury, such as in the event of fraud, claims or other liability; or
- In connection with a corporate sale, merger, reorganization, acquisition, dissolution or similar event.

We may also share statistical information about our users, traffic patterns, and related Website information, in aggregate form, with third-party affiliates and vendors. This disclosure will not contain any of your personal information.

How Long We Keep Your Information:

We only keep your personal information for as long as we need to, to be able to use it for the reasons given in this Privacy Policy, and for as long as we are required to keep it by law. The actual period for which we store your personal information will vary depending on the type of personal information and how it is used.

Your Choices and Access:

We want to keep your information accurate. You can correct or update your information or ask us to delete your information at any time by contacting us at 888-796-4997 or customercare@rti-inc.com.

The Website also allows you to choose to receive or stop receiving communications from us. To stop receiving alert notifications or emails when new reports are available, access your account at the “My Account” tab, and de-select the relevant option.

Links to Other Websites:

We do not endorse and are not responsible for the information practices or privacy policies of any other websites that may be linked to or from the Website. If you decide to access any other website that may be linked to or from the website, you should consult that website's privacy policy.

Security:

We use commercially reasonable procedures and various technical, administrative and physical safeguards to help protect the confidentiality of Personal Information. However, no data transmitted over the Internet or stored or maintained by us or our third-party service providers can be 100% secure given the reality of communication via technology systems. Therefore, although we believe the measures implemented by us are commercially reasonable and reduce the likelihood of security problems to a level appropriate to the type of data involved, we do not promise or guarantee, and you should not expect, that your Personal Information or private communications sent to us over those systems will always remain private or secure. We are not responsible for the circumvention of any privacy settings or security features.

If you believe that your Personal Information has been accessed or acquired by an unauthorized person, please promptly Contact Us so that necessary measures can quickly be taken.

Children’s Privacy:

The Website is not intended for use by children under the age of 13. In addition, we do not knowingly collect information from children under the age of 16, although certain third party sites that we link to may do so. These third-party sites have their own terms of use and privacy policies and we encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children to never provide information on our Websites without their permission.

If you have reason to believe that a child under the age of 16 has provided Personal Information to

us through a Website without the appropriate consent, please contact us as provided in the Contact Us section below with sufficient detail to enable us to delete that information from our databases.

Contact Us:

If you have any questions about this Privacy Policy or any questions or concerns regarding your privacy, please contact us at 888-796-4997 or customercare@rti-inc.com or at Restaurant Technologies, Inc., 2250 Pilot Knob Road, Mendota Heights, Minnesota, USA, 55120.

Changes to this Privacy Policy:

We may modify, alter or update this Privacy Policy at any time, so we encourage you to review this Privacy Policy frequently. We will not provide individual notice to you of changes to this Privacy Policy, but when we make updates to this Privacy Policy, we will update the date in this section. We appreciate your interest and hope that you enjoy visiting the Website.

This Privacy Policy was last updated in January 1, 2020.

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Restaurant Technologies is committed to protecting your privacy and sees the California Consumer Protection Act (“CCPA”) as an opportunity to strengthen our commitment even further. Restaurant Technologies has put in place processes and procedures to comply with the various provisions of CCPA—consumer rights, data protection addendum, data deletion, data retention, and data masking which align with our core values of customer trust and data privacy.

We do not collect or process users’ Personal Information beyond what is required for the functioning of our services, and this will never change.

This Privacy Notice for California Residents (“Notice”) supplements and is expressly made part of the information contained in Restaurant Technologies Inc.’s Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this Notice to comply with the CCPA. Any terms defined in the CCPA have the same meaning when used in this Notice.

What Is the CCPA?

The [California Consumer Privacy Act, Cal. Civ. Code §§ 1798.100 et seq.](#) is a U.S. law that was enacted in 2018 in the State of California. Generally, it expands upon the privacy rights available to Californian citizens and listing data protection requirements, with which companies must comply. Similar to the GDPR, the CCPA establishes and enhances consumer privacy rights for California residents and imposes rules on businesses that handle their personal information that relates to, describes, is associated with or can be linked to an individual.

Information We Collect:

Our Website collects information that identifies, relates to, describes, references, is capable of

being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, our Website has collected the following categories of personal information from its consumers within the last twelve (12) months:

| Category | Examples | Collected |
|---|--|-----------|
| A. Identifiers. | A 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. | YES |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | A 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. Some personal information included in this category may overlap with other categories. | YES |
| C. Protected classification characteristics under California or federal law. | 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, genetic information (including familial genetic information). | NO |
| D. Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | NO |
| E. Biometric information. | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data. | NO |
| F. Internet or other similar network activity. | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | YES |
| G. Geolocation data. | Physical location or movements. | NO |
| H. Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. | NO |
| I. Professional or employment-related information. | Current or past job history or performance evaluations. | NO |
| 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. | NO |
| K. Inferences drawn from other personal information. | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | NO |

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:

- Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
- Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Sources of Personal Information:

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete on our Website.
- Indirectly from you. For example, from observing your actions on our Website.

We do not sell Personal Information collected from you.**Use of Personal Information for Business Purposes or Commercial Purposes:**

We use the information we collect from or about you in order to help provide and support a superior user experience, including for the following purposes:

- Evaluating how well the Website content performs;
- Identifying Website content you share;
- Providing our services and technology;
- Compiling aggregate data for internal business purposes;
- Detecting security incidents, preventing potentially fraudulent, illegal or harmful activities and otherwise enforcing our Terms of Use and other policies;
- Protecting your and our rights and complying with legal obligations;
- Other uses in accordance with our Terms of Use; and
- Any other purpose that is disclosed to you at the time we collect the information or that is related to a request made by you.

Disclosing Personal Information to Other Parties:

We may disclose your Personal Information to the following categories of other parties for a business purpose or commercial purpose, as those terms are defined in the CCPA:

- Our affiliates;
- Service providers;
- Analytics companies and other third parties with whom we have business relationships;
- Our legal advisors and parties involved in a legal process; and/or
- To an entity involved in the sale of our business.

Your CCPA Privacy Rights and Choices:

The CCPA provides California residents with specific rights regarding their Personal Information as described below.

- a) Right to Know about Personal Information Collected or “Sold”

- i. You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. After we receive and confirm your verifiable consumer request, we will disclose to you within the time required by the CCPA, the relevant information, which may include:
 - The categories of Personal Information we collected about you.
 - The categories of sources for the Personal Information we collected about you.
 - Our business or commercial purpose for collecting or selling that Personal Information.
 - The categories of third parties with whom we share that Personal Information.
 - The specific pieces of Personal Information we collected about you (also called a data portability request).
 - If we sold your Personal Information, or disclosed your Personal Information for a business purpose, two separate lists disclosing: 1) sales, identifying the Personal Information categories that each category of recipient purchased; and 2) disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.
- b) Right to Request Deletion of Personal Information
 - i. You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions, including if we need the Personal Information for a reason related to our business, such as:
 - Providing goods or Services to you;
 - Detecting and resolving issues related to security or functionality;
 - Complying with legal obligations;
 - Conducting research in the public interest;
 - Exercising free speech or ensuring another’s exercise of free speech; or
 - Using the information for internal purposes that a consumer might reasonably expect.
 - ii. After we receive and confirm your verifiable consumer request, we will delete your Personal Information from our records within the time period required by the CCPA, unless an exception applies.

Exercising Your Rights:

To exercise the rights described above, please submit a verifiable consumer request to us through the web form link provided above in the Contact Us section.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include: providing your email and phone verification, known customer information, and/or account sign-up authentication or other information needed to verify your identity depending on the sensitivity of the Personal Information in question.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format:

We use good faith efforts to respond to a verifiable consumer request within forty-five (45) days after its receipt. If we need more time (up to 90 days), we will inform you of the reason and the needed extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by email.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. If we cannot comply with any portion of a request, the response we provide will also explain why, if applicable. For data portability requests, we will select a commercially reasonable format to provide your Personal Information that is commonly useable and should allow you to transmit the information from one entity to another entity without hindrance, but we do not guarantee that all formats are useable in all media. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination for the Exercise of CCPA Privacy Rights:

We will not discriminate against you for exercising any of your CCPA rights. In particular, we will not:

- Deny you goods or services;
- Charge you different prices for goods or services, whether through denying benefits or imposing penalties;
- Provide you with a different level or quality of goods or services; or
- Threaten you with any of the above.