



EU GDPR Fair Processing Notice

The Personal Data CaterTrax Inc. ("CaterTrax") collects from an end user of the CaterTrax system ("you") will be used by CaterTrax's customer, who typically is a foodservice provider that manages the end-to-end experience for catering, take-out, and other food-related products and services. The CaterTrax system includes an online ordering interface and a catering administration daily operational management interface. This **EU GDPR Fair Processing Notice** supplements the information contained in CaterTrax's [Standard Privacy Statement](#) and applies solely to all visitors, users, and others who reside in the European Union.

What is Personal Data?

Under the European Union's General Data Protection Regulation ("EU GDPR"): Personal Data is defined as "any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."

Special Categories of Personal Data

Certain data is classified under the EU GDPR as special categories and for purposes of this statement are referred to as "Sensitive Personal Data":

- Racial
- Ethnic origin
- Political Opinions
- Religious Beliefs
- Trade-union membership
- Genetic Data
- Biometric Data
- Health Data
- Data concerning a natural person's sex life
- Sexual orientation
- Other

Why Does CaterTrax Need to Collect and Store Personal Data?

In order for CaterTrax to provide you with an end-to-end experience for catering, take-out, and other food-related products and service, CaterTrax needs to collect Personal Data. This data is the minimum needed to place a catering, take-out, or other hospitality related order. You create an account with basic information such as name and email and then select from a menu of offerings to create a catered event or to order a personal meal or other ancillary food or pre-packaged food item for pick-up or delivery. The CaterTrax system provides a user interface to manage the details and changes to that order.

The Personal Data CaterTrax may collect includes:

- Your full name
- Your e-mail address
- Your phone number(s)
- Your mailing address
- Your computer's Internet Protocol (IP) address
- Your cost center number
- Your order information
- Other personal or preference information you provide to us



- Information you submit about other people, for example, the name and address of an order recipient

In any event, CaterTrax is committed to ensuring that the information it collects and uses is appropriate for this purpose and does not constitute an invasion of your privacy. CaterTrax may pass your Personal Data on to its third-party service providers who are contracted to CaterTrax (“Contractors”) in the course of dealing with you. Those Contractors are obliged to keep your details secure and use them only to fulfill the service they provide you on our behalf. Once your service need has been satisfied or the case has been closed, they will dispose of the details in accordance with CaterTrax’s procedures.

Using Your Personal Data

CaterTrax will use the information you provide for the following purposes:

- To provide you with hospitality related ordering information, products, or services that you request from us
- Managing the details and changes to orders all the way up to and including order fulfillment
- To provide you notices about your account
- To notify you about changes to our Site or any products or services we offer or provide though it
- To administer our Site, including by monitoring and analyzing our Site traffic and usage patterns
- For any other purpose with your consent

CaterTrax will process – that means collect, store and use – the information you provide in a manner that is compatible with the EU GDPR. CaterTrax will endeavor to keep your information accurate and up to date and not keep it for longer than is necessary. In some instances, the law sets the length of time information must be kept, but in most cases CaterTrax will use its discretion to ensure that it does not keep records outside of our normal business requirements.

Our aim is not to be intrusive, and CaterTrax undertakes not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Consent to Process Your Personal Data

By utilizing the CaterTrax system, you are giving CaterTrax permission to perform those actions and to process your Personal Data as described above. You may request access to or deletion of your data [here](#) or by calling 800-975-TRAX. As a result of your request, you will be given a form to complete which will provide CaterTrax with your withdrawal consent to process data per the EU GDPR. We cannot respond to your request or provide you with Personal Data if we cannot verify your identity or authority to make the request and confirm the Personal Data relates to you. We will only use Personal Data provided in a verifiable request to verify the requestor’s identity or authority to make the request.

We endeavor to respond to a verifiable request within thirty (30) days of its receipt. If we require more time (up to 60 days), we will inform you of the reason and extension period in writing.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice’s effective date. Your continued use of our system following the posting of changes constitutes your acceptance of such changes.