

## Dunkin Donut - Privacy and Policy

# PRIVACY AND POLICY OF GUEST INTERNET SERVICES

## Welcome to the Guest Internet Access Services of Dunkin Donut

### Introduction

Welcome to Dunkin'! This Privacy Notice ("Notice") outlines how Dunkin' and Galadari Food and Beverage Company LLC collects, uses, and protects your personal data. This Notice applies to the parent company, Galadari Brothers Co. LLC and its affiliated entities, which may collect and process your personal data as data controllers.

We are committed to protecting your personal information and ensuring your privacy when you access our Wi-Fi service. Please read this Privacy Notice carefully to understand how we collect, use, and protect your personal data. If you have any questions or concerns about how your personal data is being used, please contact us using the details provided at the end of this Notice.

In this Notice, "we," "us," and "our" refer to Galadari Food and Beverage Company LLC and its affiliates. The terms "you" and "'your" refer to the individual whose personal data is being collected or processed.

### Who are we?

Dunkin' (Galadari Food and Beverage Company LLC) is the data controller for the purposes of the applicable data protection law.

### Definitions Covered in this Notice

When we refer to "processing" your "personal data" in this Notice, we qualify this as any action done with or in connection with your personal data (this includes gathering, storing, and deleting such personal data). Any information that can be used to directly or indirectly identify you is considered "personal data". Examples of personal data are name, address, email address, mobile number, age, gender just to name a few.

### What this Notice Covers

- The types of personal data we collect from you;
- How and why, we collect and use your personal data;
- When and why, we may share your personal data within Galadari Brothers Co. LLC or with other third parties;
  - How we safeguard the personal data we collect; and
  - The rights and choices you have regarding your personal data.

### Types of Personal Data Collected

We process different categories of personal data further described below.

#### 1. Identification Data

Identification Data is personal data that helps us identify you, such as name, mobile number and email.

#### 2. Web Data

Web data is personal data collected via our websites such as cookies, user activity records, and IP addresses.

#### Why and How we Use Your Personal Data

Description of Processing	Category of Personal Data	Legal Basis
We process your personal data to provide you with access to our Wi-Fi service.	Contact Details (Name, Email address, Phone number)	Performance of Contract

We may process your personal data to send you promotional offers and marketing communications related to Dunkin' and its parent company.  
Consent

We process your personal data to improve our products and services based on user insights and preferences. Legitimate Interest

We process your personal data to share with our parent company for internal business purposes, such as enhancing customer experience and targeted marketing. Legitimate Interest

We process your personal data to communicate with you about our services through phone or email Contact Details, Identification Data, and Financial Data Consent

#### Sharing Your Personal Data

We may share your personal data with third parties under the following circumstances:

##### Internal Data Sharing

We may share your personal information with our parent organization and affiliated companies for business purposes, including marketing and improving our services.

##### Service Providers

We work with carefully selected service providers who perform certain functions on our behalf. These include companies that assist with technology services (e.g., providing Wifi services in our outlets). We only share the personal data necessary for our service providers to perform their duties.

##### Marketing, Security & Analytics Partners

We may share your personal data with third-party marketing, security, and analytics service providers to help us market, secure, and understand the use of our services and platforms.

#### Other Circumstances

We may share personal data with other organizations in the following situations:

- When required by applicable law or a public authority;
- With anyone to whom we transfer our rights and duties under our agreement with you.

Sharing Your Personal Data with Other Organisations

We may share your personal information in the following situations:

- When required to do so by applicable law or a public authority; or
- When it is necessary to share personal information to establish, exercise, or defend our legal rights,

#### Transfer of Your Personal Data to Other Countries

When processing your personal data, we might share it with third parties in other countries to the extent required to achieve the purposes stated in this Notice. Your personal data may be shared within this group of companies, as well as with Galadari Brothers Co. LLC's subsidiaries located in countries outside of Oman. Such transfers shall be continually done in accordance with applicable data protection laws.

We transfer personal data from the United Kingdom and the European Economic Area ("EEA") to organizations outside the EEA in accordance with the EU Standard Data Protection Clauses. For more information regarding transfers, please contact us at [dpo@galadaribrothers.com](mailto:dpo@galadaribrothers.com).

## How We Secure Your Personal Data

We are committed to protecting the information you provide us. We have adopted appropriate technological and operational security measures to protect your personal data against accidental loss, abuse, alteration, or destruction. Only authorized people have access to personal data, and these individuals are contractually bound to keep it confidential. We require our suppliers and vendors to implement appropriate safeguards when they access or use personal data that we share with them.

While we strive to ensure the security and protection of your personal data, its security also depends on the safety of the computer or mobile device you use to communicate with us, as well as the security measures you take to protect your user ID and passwords. To keep your personal data safe, please take appropriate steps to safeguard your user ID, passwords, and any other information needed to access our platforms.

#### Retention of Personal Data

We retain your personal data for as long as necessary to fulfil the purposes outlined in this Notice. After this period, we will securely delete your personal data, unless we are obligated to retain your personal data to comply with a legal or regulatory requirement or to deal with any potential disputes.

If we no longer need to keep your personal data, we will delete it from our systems and records and/or take steps to properly anonymize it so that you cannot be identified from it.

## Marketing Communications

All marketing communications we direct at you we will provide you with a way to withdraw your consent to future marketing. If you no longer wish to receive promotional materials you may opt-out from receiving these communications or change your account settings, this will remove you from marketing lists.

## Cookies and Similar Technologies

We use cookies and similar technologies to personalize and enhance your experience on our websites and mobile apps, as well as to deliver relevant online advertising. Cookies are small data files that allow a website or app to collect and store information on your computer or mobile device.

Cookies enable us to provide important features and improve the functionality of our websites and mobile apps. For instance, we use cookies to:

#### Improve Functionality

Cookies help us enhance how our websites and mobile apps operate, allowing us to personalize your experience and enable useful features. For example, cookies remember your preferences and keep the contents of your shopping cart when you return to our sites or apps.

#### Enhance Performance

Cookies help us understand how our websites and mobile apps are being used, such as alerting us to error messages. The data collected is typically aggregated and anonymous.

#### Deliver Relevant Advertising

We use cookies to show you online ads that are most relevant to you on our websites and others. These cookies, sometimes placed by other organizations with our permission, may track your online behaviour, like your IP address, browsing history, and shopping cart contents. This means you might see our ads on other websites, and ads from other organizations on our websites.

We may also combine data from cookies on your computer or other devices with other information we have, such as loyalty program data, to deliver more relevant advertising.

## Measure Marketing Effectiveness

Cookies help us track whether you've seen a particular ad and how long it's been since you last saw it. This allows us to measure the effectiveness of our advertising and limit the number of times you see the same ad. We also use cookies to see if you've opened a marketing email from us.

## Your Privacy Rights

You have certain rights that you can exercise. Please send an email to [dpo@galadaribrothers.com](mailto:dpo@galadaribrothers.com) to exercise your rights. The following rights may be applicable to you, depending on the jurisdiction where your personal data is processed:

#### Data Privacy Right What does it mean?

**Right to access your data** You have the right to request from us a summary or a copy of the personal data that we have on file about you.

**Right to have your data updated or deleted** You have the right to request that we immediately amend any inaccurate or missing personal data we may have about you along with the right to request that your personal data be deleted if it is no longer needed or processing is prohibited by law.

**Right to limit or stop data processing** You have the right to limit how your personal data is processed in certain situations.

**Right to request transfer of personal data or data portability** You have the right to obtain your personal data in an organized, machine-readable manner, or request to transfer it to a third party.

**Right to raise objections to data processing** You have the right to raise an objection to the processing of your personal data.

**Right to revoke consent** You have the right to revoke your consent at any point. The legitimacy of processing done using your consent prior to its revocation will remain unaffected by the withdrawal of your consent.

**Right to file a complaint** You have a right to file a complaint with the Emirates Data Office or the relevant supervisory authority in your country if you believe that we have not complied with the applicable data protection laws.

It is important to note that the rights stated above are not absolute and that not every request can be fully granted. In certain cases, for instance where we are required to retain your personal data by contracts or the law, we might not be able to delete it or limit its processing.

## Automated Decision Making/Profiling

Our artificial intelligence technologies may enable automated data processing in several fields. This is called "profiling". If we make use of profiling, we will always obtain your consent. We will also conduct privacy impact assessments to implement appropriate measures to protect your rights.

When we make use of profiling, you have the right to object against it. This right can be invoked by using the contact details provided in the "Contact Us" section below.

### **Personal Information from Minors**

We do not knowingly collect personal data from individuals under the age of 16. Our WiFi service is intended for use by those aged 16 and older. If we become aware that we have inadvertently collected data from a minor under 16, we will take reasonable steps to delete it from our records.

### **Privacy Center**

Our Privacy Center enables you to customize your consent preferences. By clicking on Privacy Center, you can manage the consent given to us.

### **Contact Us**

If you have any questions or concerns about this Privacy Notice, please feel free to contact us at [dpo@galadaribrothers.com](mailto:dpo@galadaribrothers.com).

### **Updates to the Notice**

This Notice may be updated on a regular basis to reflect new developments. We reserve the right to update, add, or remove portions of this Notice at any time. You are also advised to revisit this Notice periodically for updates.

The most recent update to this Notice will be indicated below.