

# PRIVACY STATEMENT

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## Introduction

Westlife Foodworld Limited (WFL), formerly known as Westlife Development Ltd (WDL), focuses on setting up and operating Quick Service Restaurants (QSRs) in India through its subsidiary Hardcastle Restaurants Pvt. Ltd. (HRPL). The Company operates a chain of McDonald's restaurants in West and South India having a master franchisee relationship with McDonald's Corporation USA, through the latter's subsidiary. WFL and its subsidiaries ("we" or "us" or "our") are committed to protecting and respecting your privacy. This Privacy Statement describes how we collect, use, disclose, protect and share the personal information of our customers. Customers include those who visit our restaurants, use our websites and mobile apps, and otherwise interact with us. The data controller of your personal information is WFL in the jurisdiction where your personal information is collected.

## 1. Information we collect

We may collect personal information about you when you visit our restaurants, use our websites or mobile apps ("online services"), and otherwise interact with us (collectively, "services"). The information we collect falls into three categories: (a) information you provide to us; (b) information we collect through automated methods when you use our services; and (c) information we collect from other sources (read below).

Generally, you are under no obligation to provide your personal information to us. However, in certain cases, we may be unable to provide you with our services unless you provide your personal information.

We may combine the information you provide to us with information that we collect through automated methods, and with information we receive from other sources. For example, when you add a method of payment to your profile in our mobile app, we may combine your profile with information we receive from our payment processors or other providers regarding transactions made with the same payment credentials in our restaurants.

### *We collect information you provide to us*

You may provide the following information to us, depending on how you interact with us:

- personal details, such as your name, postal and email addresses, phone number, birthday information, gender and other contact information, when you register with our online services, log-in to Wi-Fi, enter one of our promotions or competitions, or contact us by phone or through our online services;
- demographic information such as age or gender;

- transaction information, including information about the products you buy, prices, method of payment and payment details;
- account information, such as your username or password (or anything else that identifies you) used to access our online services or to buy or use our products and services;
- profile information, including products and services you like, or times you prefer to visit us; and
- other personal information you choose to provide us when you interact with us (including through social media and call centers).
- Any other information you provide to us voluntarily

### *We collect information through automated methods*

We may use automated technology to collect information from your computer system or mobile device when you visit our restaurants, use our online services, or in-restaurant technology. Automated technology may include cookies, local shared objects, and web beacons. There is more information below about cookies and other technologies in point no. 6 below.

We may collect information about your:

- internet protocol (IP) address;
- computer or mobile-device operating system and browser type;
- type of mobile device and its settings;
- unique device identifier (UDID) or mobile equipment identifier (MEID) of your mobile device;
- device and component serial numbers;
- advertising identifiers (for example, an Identifier for Advertising (IDFA) on Apple devices) or similar identifiers;
- referring webpage (a page that has led you to ours) or application;
- online activity on other websites, applications or social media;
- visits to our restaurants, where recorded using digital technology (e.g. video recordings); and
- activity related to how you use our online services or in-restaurant technology, such as the pages you visit on our online services.

Our online services and in-restaurant technology may collect information about the location of your mobile device or computer using geolocation and technology such as GPS, IP Geolocation services, Wi-Fi, Bluetooth, or cell tower proximity. For most mobile devices and computer systems, you can disable the collection of this information by using the device or web-browser settings. If you have any questions about how to

prevent us from collecting information about your location at a device level, we recommend you contact your mobile-device service provider, the device manufacturer, or your web-browser provider. Some online services and in-restaurant technology may not work properly without information about your location.

### *We collect information from other sources*

We may collect information about you from the McDonald's Family. The McDonald's Family consists of McDonald's Corporation and McDonald's Global Markets LLC, and their affiliates, and subsidiaries ("McDonald's Entities"), and franchisees of McDonald's Entities, business partners, and vendors (e.g., food delivery platforms, data providers, or payment processors) or from public sources (e.g., your public social media posts).

## **2. How We Use the Information We Collect**

We use each category of the information we collect for the following purposes:

- to provide our products and services and contract with you, including payment processing and customer support;
- to manage our relationship with you, including feedback management and for customer surveys;
- to personalize and improve our products and services and your overall customer experience, in particular by improving our existing technologies and developing new products and services and employing profiling technology (unless we notify you separately thereof, this will not include automated individual decisions that have legal effects for you or similarly significantly affect you);
- to communicate with you, either directly or through one of our business partners to provide you with updates and other information relating to our services, as well as our website or mobile apps
- to provide you with general and personalized electronic and non-electronic direct marketing information and support our targeted advertising initiatives concerning our products and services, as well as our business partners' products and services (including promotions, contests, prize draws, competitions, and sweepstakes);
- business analytics, including consumer and operations research, to assess the effectiveness of our sales, online service, marketing, and advertising, and to analyze market trends and (future) customer demand;
- to ensure the security of our online services and in-restaurant technology including the detection, prevention, and investigation of attacks;

- to protect against, identify and prevent fraud and other crime, claims and other liabilities;
- to protect the rights, safety, health, and security of our customers, our employees, our franchisees, and the general public, and to protect our property;
- to anonymize your information for further internal and external use in a manner that does not identify you;
- to comply with legal obligations, our policies, or our Standards of Business Conduct; and
- to establish, exercise or defend a legal claim.

We may use the information we collect about you in other ways, which we will tell you about at the time we collect it or before we begin using it for those other purposes, in compliance with applicable laws or rules.

### **3. How We Share the Information We Collect**

We may share all or substantially all categories of your personal information with:

- members of The McDonald's Family;
- vendors who help us operate our business (including information technology service providers, data analytics, CRM and marketing agencies that we use as well as those who use the information for legitimate business uses such as personalization, marketing or detection or prevention of fraud etc., and who may use the information to provide such services to others);
- public authorities and courts, if required to do so by law or in response to valid requests by public authorities;
- buyers or other parties involved in a corporate transaction if we decide to sell or merge or transfer all or part of our business or acquisition of all or a portion of our business to another company;
- our professional advisers such as our legal representatives, auditors and insurance brokers; and
- business partners if they are involved in your customer experience, including product or service delivery (e.g., food delivery platforms).

We do not sell your personal information for monetary consideration and only share your information as described in this Privacy Statement or as otherwise communicated to you at the time we collect your information.

### **4. Children's and Person with Disability Privacy Notice**

We understand how important it is to protect your privacy when you use our online services. We are especially committed to protecting the privacy of children under the

age of 18 and persons with disabilities who may require assistance with their personal data who visit or use our online services. We urge parents, guardian, or authorized representative to regularly monitor and supervise their children's or persons with disabilities online activities. If you have any questions about our privacy practices, please contact us at [myfeedback@mcdonaldsindia.com](mailto:myfeedback@mcdonaldsindia.com).

## **5. Your Choices and Rights**

### *Marketing Communications*

If you are subscribed to our marketing communications, you can later opt out by following the opt-out instructions in the marketing communications we send you. You can also generally find your communication preferences with instructions on how to opt out in the profile section of the online services that you use. You may also have the ability to change your communication preferences using your device settings. You can also opt out by contacting us at [myfeedback@mcdonaldsindia.com](mailto:myfeedback@mcdonaldsindia.com)

If you do opt out of receiving marketing communications from us, we may still send communications to you about your transactions, any accounts you have with us, and any contests, competitions, prize draws or sweepstakes you have entered. Opting out of one form of communication does not mean you have opted out of other forms as well. For example, if you opt out of receiving marketing emails, you may still receive marketing text messages if you have opted in to receiving them.

We do not share personal information with third parties for their own direct marketing purposes unless you give us permission to do so. When we give you notice, and you consent, we will share your personal information as you direct us to.

### *Your Personal Information Rights*

Under applicable law, you may have certain rights (subject to the conditions and extent specified in the law):

- Right to access: You may have the right to check whether we hold any personal information about you and request access to or copies of such data.
- Right to correction or deletion: You may have the right to request the correction or deletion of inaccurate, incomplete, outdated, unnecessary, excessive, or other applicable personal information about you.
- Right to restriction: You may have the right to request the restriction of the collection, processing, or use of your personal information.
- Right to object and withdraw consent: In specific situations, you may have the right to object to the processing of your personal information for legitimate reasons or

withdraw previously granted consent without affecting the lawfulness of processing prior to the withdrawal.

- Right to data portability: You may have the right to request your personal information in a portable format to facilitate a transfer of personal information to another service provider.
- Right to file a complaint: You may have the right to lodge a complaint with the relevant authority. You can find information regarding the relevant authority in the country-specific addendum.
- Right to nominate: You may have right to nominate any other individual, who shall, in the event of your death or incapacity, exercise your rights, as per applicable laws or rules.

## **6. Use of Cookies and Other Technologies**

We and our vendors may use cookies, web beacons and other similar technologies on our online services and in other areas related to our business, such as online advertising, to collect information and provide you with the services or products that you have requested.

### *Information on the use of cookies, pixels, and other tracking technologies*

We use cookies, pixels, and other tracking technologies on our online services to operate our online services, provide functionality of our online services, remember your preferences and settings, personalize your online experience and our marketing and other communications to you, strengthen security and integrity of our online services, combat fraud, analyze and improve the performance of our online services, and to fulfill other purposes described in this Statement.

A “cookie” is a small text file that is placed onto an Internet user’s web browser or device and is used to remember and/or obtain information about the user. A cookie will typically contain the name of the domain from which the cookie has come, the “lifetime” of the cookie, and a randomly generated unique number or other value. For example, after you login, we may use a cookie in your browser to save your user identifier so you don’t need to login again until the cookie expires. You may adjust your web browser settings if you do not wish to receive a cookie or if you would like to be notified when you receive a cookie. If you decide to disable certain cookies, you may not be able to take advantage of all the features available through our online services.

Certain pages on our online services and social media pages, as well as some of our email communications, may contain “web beacons,” “pixels,” or other similar



technologies. A “web beacon” is a small object or image that is embedded into a web page, application, or email and is used to track activity. They are also sometimes referred to as “pixels” and “tags.” Web beacons, pixels and tags may be used with cookies to understand how users interact with us and to help manage and improve those interactions.

Please note the following:

- You might be assigned a cookie when using our online services.
- We offer certain features that are available only through the use of cookies and other similar technologies.
- We may use both session (for the duration of your visit) and persistent (for the duration of a fixed period of time) cookies and other tracking technologies unless you delete them.
- We may also adopt new technologies to perform functionality as described in this Statement.
- Our online services and other areas related to our business may have web beacons.

### *Cookies served through our online services*

We may use the following categories of cookies. These cookies may be set by us or by third-party providers whose services we have added to our online services.

**Strictly Necessary Cookies:** These cookies are necessary for our online services to function and cannot be switched off at your request. For example, these cookies are used for system administration, fraud detection, security measures, and other basic operation and functionality of our online services. Depending on your browser functionality, you may be able to set your browser to block or alert you about these cookies, although some functionality of our online services may be lost.

**Performance Cookies:** These cookies allow us to track visits and traffic sources so we can measure and improve the performance of our online services. For example, they help us to know which pages are the most and least popular and understand how visitors move around our online services. If you set your preferences to decline these cookies, we will not know when you have used our online services and how we can improve our online services based on your online experience.

**Functional Cookies:** These cookies enable us to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you decline these cookies, some of our online services may not function properly.

**Targeting Cookies:** These cookies may be set through our online services by us or our advertising partners. They may be used to build a profile of your interests and show you relevant advertisements on other sites. These advertisements may also place cookies that can view, edit, or set other third-party cookies in your web browser. If you decline these cookies, you will experience advertising that may not be tailored to you.

**Social Media Cookies:** These cookies may be set by social media services that we have added to our online services to enable you to share our content with your friends and networks. These cookies can track your browser across other sites and building up a profile of your interests.

**YouTube Cookies:** YouTube cookies are used to load external content from YouTube that is embedded on our online services. If you decline these cookies, you may not be able to play YouTube videos as part of your browsing experience.

We and selected third parties (such as our advertising networks) may use these technologies to collect information about your online activities, over time and across third-party websites and devices, and when using our online services to further personalize your experience with us.

### *How to control and delete cookies*

You have options to control and/or delete cookies as described below. Please be aware that restricting cookies may have an impact on online services' functionality. Disabling these cookies may limit your experience, including your ability to find pricing and availability of products and services in your area.

**mcdelivery.co.in:** You may accept or reject cookies, except strictly necessary cookies, by using the cookie preference section of the online service.

**Browser Controls:** Use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. Select the "Help" section of your browser to learn how to change your cookie preferences. If you disable all cookies, you may not be able to take advantage of all the features available on a website.

Some newer web browsers may have a "Do Not Track" preference that transmits a "Do Not Track" header to the websites you visit with information indicating that you do not want your activity to be tracked. WFL does not currently take actions to respond to Do Not Track signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a standard once one is created.

In our mobile applications (e.g., McDelivery India), we use “software development kits” (SDKs). Like cookies, SDKs enable information to be stored on your end device or access to such information.

### *Targeted advertising*

When you use our online services, we (and our vendors) may collect information about your activities so that we can provide you with advertising tailored to your interests.

**Ad Networks’ Controls:** We work with ad networks that may be members of the Digital Advertising Alliance or the Network Advertising Initiative. Because we utilize advertising (“ad”) networks, you may notice certain ads on other websites. Ad networks allow us to target the information we send you based on your interests, other information related to you, and contextual means. These ad networks track your online activities over time by collecting information through use of cookies, web beacons, and other technologies. The ad networks use this information to show you advertisements that may be of particular interest to you. The ad networks we utilize may collect information about your visits to websites that also take part in the relevant ad network, such as the pages or advertisements you were displayed and how you use the websites. We use this information, both on our online services and on third-party websites that take part in the ad networks, to provide you with advertising tailored to you, and to help us assess how effective our marketing is.

Depending on the type and version of the operating system of your mobile device, you may also be asked whether to enable targeted advertising. You can opt-out of having your mobile advertising identifiers used for certain types of targeted or personalized advertising by accessing the settings in your mobile device.

## **7. Links to Other Websites and Social Media**

Our online services may offer links to websites that are not operated by us but by third parties. If you visit one of these linked websites, you should read the linked website’s privacy policy, terms and conditions, and other applicable policies. We are not responsible for the policies and practices of third parties. Any information you give to those organizations is dealt with under their privacy policy, terms and conditions, and other policies.

We may also make our business partners’ apps, tools, widgets and plug-ins available to you on our online services, such as Facebook “Like” buttons, which may also use automated methods to collect information about how you use these features. These organizations may use your information in line with their own policies.

## **8. Security**

We use technical, physical, and organizational security measures designed to protect against unauthorized access, disclosure, damage, or loss of personal information and adopt applicable commercially reasonable security safeguards internally and with our third-party service providers to protect personal information. However, the collection, transmission and storage of information can never be guaranteed to be completely secure. Please take steps to secure your access credentials such as login name, password, and OTPs; and do not share them with anyone.

## **9. Retention**

Unless a specific retention period is mandated or permitted under applicable law, WFL will only retain personal information for the duration of time necessary to fulfil the purposes described in this Statement. Our records policies reflect applicable laws. We will retain and use your information to the extent necessary to manage your relationship with us, personalize and improve your overall customer experience, and to comply with our legal obligations (for example, if we are required to retain your information to comply with applicable tax/revenue laws), resolve disputes, enforce our agreements, and as otherwise described in this Statement. Once the data is no longer needed, we will securely delete or anonymize it.

## **10. International Data Transfers**

The McDonald's Family is global in nature with business processes, management structures and technical systems that cross borders. As such, we may share information about you within the McDonald's Family and transfer it to countries in the world where our vendors or members of the McDonald's Family are established. Any international data transfers will be in accordance with this Privacy Statement and in compliance with applicable laws.

## **11. Changes To Our Privacy Statement**

From time to time we may change, modify, or amend this Statement in order to comply with the evolving regulatory environment or reflect the way we operate our business or use technologies. Subject to any applicable legal requirements to provide additional notice and/or obtain consent, any changes to this Statement will be communicated to you through existing WFL's communication channels and resources. Alternately, you should check here regularly for the most up-to-date version of the statement.

## **12. How To Contact Us**

In line with our Standards of Business Conduct, we hold ourselves to ethical standards when it comes to data privacy and protection and we welcome any feedback or questions you may have concerning the collection and processing of your personal data. If you have any questions regarding our privacy practices or this privacy statement, or to request this privacy statement in another format, please contact us at: Hardcastle Restaurants Private Limited, 1001, Tower - 3, 10th floor, One International Center, Senapati Bapat Marg, Prabhadevi, Mumbai – 400013. Email: [myfeedback@mcdonaldsindia.com](mailto:myfeedback@mcdonaldsindia.com)

## **13. Grievance Redressal**

If you have any concerns or complaints regarding the processing of your personal data, please contact our Grievance Officer. We will address your grievance in accordance with applicable laws.

- Grievance Officer: Customer Relations Executive
- Email: [myfeedback@mcdonaldsindia.com](mailto:myfeedback@mcdonaldsindia.com)
- Contact details: 022 49135000
- Response Time: We will acknowledge and resolve your grievance within 30 days

## **14. Governing Law and Jurisdiction**

This Privacy Statement and any disputes arising out of or related to it shall be governed by and construed in accordance with the laws of India. By using our services or providing us with your personal information, you agree to submit to the exclusive jurisdiction of the courts located in Mumbai for the resolution of any disputes.