

Privacy Notice

Using your personal data in a fair and transparent way is important to GIN, LLC (“GIN” or “we”). When you use our desktop or mobile websites and applications (the “Platform”), we collect information about you, including information that can be used to identify you (“Personal Information”). Additionally, we may obtain Personal Information about you from our parent company, GIN Technologies, Inc. and its other subsidiaries (“GIN Parties”) and other third parties as described in this Privacy Notice. We collect this data to provide allow you to place orders and access other functionality on the Platform (the “Services”), as well as for the other purposes described in this Privacy Notice.

This Privacy Notice is intended to help you understand: (A) What Personal Information we collect, how we collect it, how we use it, and how we share it, (B) The choices you have related to your Personal Information, and (C) How we protect your Personal Information.

Please take a moment to review the terms of this Privacy Notice, which is incorporated into the Terms of Service governing your use of the Platform and Services, available _____

By accessing the Platform or using the Services, you agree that we may collect, process, and share your information (including Personal Information) consistent with this Privacy Notice and to the Terms of Service.

1. TYPES OF INFORMATION WE COLLECT

The following information is collected by or on behalf of GIN:

A. User Account Information

When you register for the Platform or use our Services, we ask that you provide information that can be used to personally identify you. This includes details such your full name, email address, phone number, date of birth, delivery address, and billing address.

B. User Credentials

When you register for the Platform, you will be asked to provide credentials to allow you to access your account. These credentials may include a username, password, security questions, and responses to security questions.

C. User Identifiers

We assign you one or more unique numbers or other identifiers that we use to identify you in GIN’s internal systems and recognize you over time and across different devices, websites, and online services. These identifiers may be used in conjunction with cookies and other Technical information.

D. Payment Card Information

We collect and store the last four digits and expiration date of any payment card that you use to make a purchase on the Platform. However, we do not collect or store full payment card numbers on our systems. All payments are processed using a secure third party.

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E. Precise Location Data

In some circumstances, we collect precise geolocation data (geolocation data sufficient to identify a street name and name of a city or town) from your device when you access the Platform.

F. User Content

We collect the data you submit when you contact GIN customer support; provide ratings or feedback for products or retailers; or otherwise engage directly with GIN personnel. User content may include photographs, or audio or video recordings submitted by you in connection with a customer support request. This also includes metadata relating to the method you use to communicate with GIN.

G. Usage and Device Data

We collect certain information automatically when you access the Platform or by using cookies. This Technical Information may include:

1. Your browser type and operating system
2. Your Internet Protocol (IP) address, which is the number automatically assigned to your computer whenever you access the Internet and that can sometimes be used to derive your general geographic area
3. Websites you visited before and after visiting the Platform
4. Pages you view and links you click on within the Platform
5. Information collected through cookies, web beacons, and other technologies
6. Information about your interactions with e-mail messages, such as the links clicked on and whether the messages were opened or forwarded
7. Standard server log information

We may combine Technical Information that does not identify you with Personal Information. If we do so, we will treat the combined information as Personal Information under this Privacy Notice.

H. HOW WE USE PERSONAL DATA

1. *GIN uses data to enable reliable and convenient delivery, and other products and services. We also use such data:*
 - a. *to enhance the safety and security of our users and services*
 - b. *for customer support*
 - c. *for research and development*
 - d. *to enable communications between users*
 - e. *for marketing and advertising*

- f. to send non-marketing communications to users*
- g. in connection with legal proceedings*

2. We use the data we collect: To provide our services. GIN uses data to provide, personalize, maintain, and improve our services.

This includes using data to:

- a. create/update accounts.
- b. enable transportation, delivery and other services/features, such as:
 - o using location data to navigate delivery, calculate ETAs, and track the progress.
 - o features that involve data sharing, such as sharing driver first name and vehicle information with users and retailers to facilitate pick-ups, user profile and delivery details for ETA sharing and fare splitting, and user ratings and compliments.
 - o match available delivery persons to users requesting services.
 - o features that facilitate use of our services by those with disabilities.
 - o features that involve account linking, such as linking of email to create GIN
- c. enable dynamic pricing in which delivery fees are determined based on factors such as estimated time and distance, predicted route, estimated traffic, and the current number of users requesting or providing services.
- d. process payments.
- e. personalize users' accounts. For example, we may present order recipients with personalized recommendations based on their prior orders.
- f. facilitate insurance, vehicle, invoicing, or financing solutions.
- g. provide users with delivery updates, generate receipts, and inform them of changes to our terms, services, or policies.
- h. perform necessary operations to maintain our services, including to troubleshoot software bugs and operational problems.

GIN performs the above activities on the grounds that they are necessary to fulfill the terms of our agreements with users, are compatible with such uses, or on the grounds that they are necessary for purposes of GIN's and its users' legitimate interests.

3. Safety and security. We use data to help maintain the safety, security, and integrity of our services and users. This includes:

- a. verifying users' identity and eligibility to provide deliveries, including through reviews of background checks, to help prevent use of our services by unsafe persons.

- b. sharing user name, location, phone number, vehicle details and other relevant information with third-party companies that support the management and de-escalation of interpersonal conflicts that may occur between users while on in the process of making a delivery.
 - c. GIN performs the above activities on the grounds that they are necessary to fulfill the terms of our agreements with users, and/or for purposes of the legitimate safety and security interests of GIN, our users and members of the general public.
- 4. Customer support. GIN uses the information we collect (which may include call recordings) to provide customer support, including to investigate and address user concerns and to monitor and improve our customer support responses and processes.

GIN performs the above activities on the grounds that they are necessary to fulfill the terms of our agreements with users or for purposes of GIN's legitimate interest in monitoring and improving its customer support services.

- 5. Research and Development. We use data for testing, research, analysis, product development, and machine learning to improve the user experience. This helps us make our services more convenient and easy-to-use, enhance the safety and security of our services, and develop new services and features. We may use analytics, machine learning, and data models ("Analytics") to support our data processing activities. Some of our Analytics rely upon Personal Information that we collect from you, your interactions and use of the Platform, and from third parties. Using this Personal Information, our Analytics allow us to tailor our Services to your specific needs and preferences, provide certain services to our partners, and develop new features. GIN performs the above activities on the grounds that they are necessary for purposes of GIN's legitimate interests in improving and developing new services and features.
- 6. GIN uses Personal Information to market its services the services of retailers, and other third-party partners. This may include:
 - A. Sending emails, text messages, push notifications, and in-app messages or other communications marketing or advertising products, services, features, offers, promotions, sweepstakes, news and events.
 - B. This may include using your location, order history, and usage data to send marketing communications that are personalized based on your observed or inferred interests and characteristics. For example, we may send in-app messages offering discounts or promos for products similar to those that you have previously ordered.

7. Displaying GIN advertising on third-party apps or websites. This includes using your location, order history, and usage data, and sharing Personal Information with advertising partners, to personalize such ads to your interests.
 8. Displaying third-party advertising on the Platform or in connection with the Services. This includes ads for specific products. These ads (which are identified as “Sponsored” or “Ads” on the Platform) may include recommendations that are personalized based on your location and order history. This also includes ads for other third-party products or services that are personalized based on your observed or inferred interests and characteristics, which we determine using data such as order history, usage data, demographic data, and device or user identifiers.
 9. Measuring the effectiveness of GIN’s ads, and of third-party ads displayed on the Platform or in connection with the Services.
- I. Data Sharing and Disclosures
- We disclose Personal Information to the following entities, or as otherwise identified at the time of collection:
1. Retailers and Drivers
If you place an order using the Platform, we share details about your identity with the retailers, drivers that will be fulfilling your order. These parties use your information to deliver the products you ordered to the designated address and to verify the age and identification of the individual receiving the order.
 2. Delivery Services
In some cases, retailers may utilize third party services to deliver your order. We may share your Personal Information with these third parties as part of the Services.
 3. Other Users of the Platform
If you place a gift order, the individual receiving the gift may be notified that it was sent on your behalf.

If you write a review on the Platform, the name you provide at the time you post the review will be visible to all other Platform users.
 4. Co-Branded Offerings
At certain times, we may provide you with access to deals, promotions, or opportunities (“Promotions”) in association with our partners. Such Promotions will identify the partner and indicate if they have a Privacy Notice that applies to their collection and use of your information. If you register for their products and/or services, communicate with these partners, or download their content or applications as part of a Promotion, you may be providing your information to both GIN and the partner. If this is the case, we will provide disclosures as part of the Promotion. We are

not responsible for our partner's data practices and you should carefully review each partner's Privacy Notices before participating in a Promotion that they are sponsoring.

5. Affiliates and Business Transfers

We may share your Personal Information with our subsidiaries, and affiliates for use consistent with this Privacy Notice.

Additionally, we may share your Personal Information in connection with, or during negotiations of, a transaction that alters the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or a portion of our business, assets or stock, including a bankruptcy or similar proceeding.

6. Service Providers

We provide data, including Personal Information, to vendors, consultants, research firms, and other service providers. These include:

- a. Payment processors and facilitators
- b. Background check and identity verification providers
- c. Cloud storage providers
- d. Data analytics providers
- e. Research partners, including those performing surveys or research projects in partnership with GIN or on GIN's behalf
- f. Vendors that assist GIN to enhance the safety and security of its apps
- g. Consultants, lawyers, accountants, and other professional service providers
- h. Insurance and financing partners

7. Corporate Clients

If a company (such as your employer) pays for your order or places an order on your behalf, we may share your Personal Information with that company so it can verify that you received your order.

8. Advertising Companies, Social Media Sites, and Brand Partners

We may provide your Personal Information to advertising companies (including marketing firms, audience analytics firms, advertising platforms, and consultants), social media platforms, and brands that we partner with so that they (and GIN) can better understand your purchasing habits and preferences. In some circumstances, we may also allow these companies to collect Personal Information directly from your browser or device through Tracking Technologies when you interact with the Platform. These companies may use the information we provide to determine how to direct advertisements and what individual or demographics to target, both on the Platform and elsewhere. They may also use this information to create or improve profiles about you that may be utilized by third party advertisers.

9. Compliance with Laws and Protection of Rights

We may disclose your Personal Information as we believe necessary to comply with any applicable laws, court orders, subpoenas; to respond to lawful requests by law enforcement, regulators, or government entities; to detect, prevent, investigate or combat possible crime, such as identity theft, or other fraudulent activity; to protect the security of the Platform and Services; to enforce or apply our online Terms of Service or other agreements; to protect our own rights or property or the rights, property, or safety of our users or others; and to investigate or address claims or disputes relating to the Services.

10. With Consent

We may share your data other than as described in this notice if we notify you and obtain your consent.

J. Data Retention and Deletion

GIN retains user data for as long as necessary for the purposes described above. This generally means that we retain your Personal Information for the life of your account, and delete it 60 days after you request account deletion or your account is deemed inactive.

You may request deletion of your Personal Information at any time as described in more detail in the Choice and Transparency section of this Privacy Notice. Please note that we may retain your Personal Information after a deletion request due to legal or regulatory requirements.

K. Data Protection

We maintain a number of administrative, physical, and technological measures to protect the confidentiality, privacy, and security of your Personal Information. These controls vary based on the nature of the information and industry standards. Unfortunately, no website, server or database is completely secure or “hacker proof.” We therefore cannot guarantee that Personal Information you provide will not be disclosed, misused, or lost by accident or by the unauthorized acts of others.

Safeguarding your Personal Information is also your responsibility. We encourage you to change your passwords often, use a combination of letters and numbers, and make sure you are using a secure device to access the Platform. If you have reason to believe that the security of your account might have been compromised, or if you suspect someone else is using your account, please let us know immediately by contacting our customer service.

L. You may exercise control over your Personal Information in the following ways:

1. Device Permissions

Most mobile device platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without the device owner's permission, and these platforms have different methods for how that permission can be obtained. Please check the available settings on your device or check with your provider.

2. Platform Inbox, Push Notification, and SMS Messaging

When you first register to use our Platform, you may authorize us to communicate with you through the Platform inbox, push notifications, and SMS messages. You can adjust these settings at any time in the settings.

3. Email communications

We include an "unsubscribe" link in each electronic newsletter or promotional e-mail we send you. If you no longer wish to receive such communications from us, please click that link and follow any additional instructions.

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4. Tracking Technologies

Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. If you do not accept cookies, you may experience some inconvenience in your use of the Platform. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit the Platform.

You may opt out of receiving interest-based advertising on the Platform by submitting a "Do Not Process" request to customer service. "

5. Deleting your Information and Updating and Correcting Your Information

You may request that we delete your Personal Information from our systems by contacting customer service. Please note that it may take us several days to verify your identity and process your request.

6. If you are a resident of a state that has enacted specific laws that govern how GIN can collect and process your Personal Information, and you would like to exercise your right to "opt-out" or make any other requests under state law please contact customer service.

M. Notice to Users Outside the United States

GIN is based in the United States and only offers the Services in the United States and Canada. Regardless of where you access the Platform or Services, the information collected as part of that use will be transferred to and maintained on servers located in the United States. Any Personal Information that we obtain about you will be stored in the United States where data protection laws may not be as protective as those applicable where you live. By using the Platform or Services, you consent to this collection, transfer, storage, and processing of information to and in the United States.

N. Contact GIN

If you. Have any questions about this Privacy Notice or our privacy practice, or would like to contact Gin's Privacy Officer, please send an email to legal@gindelivers.com or write as at _____

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O. Updates

We may occasionally update this Privacy Notice. If we make material changes, we will notify users by updating the "last updated" date at the top of this Privacy Notice and sending notice through email or the Platform. Your continued use of the Platform or Services after we have posted the revised Privacy Notice constitutes your agreement to be bound by the revised Privacy Notice to the extent permitted by law.