



## PRIVACY POLICY

Version 4.0 – January 2026

### OVERVIEW

Your privacy is important to us. This Privacy Policy sets out the procedures Payar Limited and Payar Technologies FZ-LLC (collectively, "Payar") have in place in relation to the collection, use and disclosure of information we collect across our entire business operations. This includes information provided via our websites, our native mobile applications (including the toodle Hub), the toodle Portal structure for outlets and venue operators, our internal Admin Portals, or through any other direct or indirect interactions with third parties. Where we provide branded template solutions to our clients, please note that while we govern the data processing, the specific branding and content are provided by the client and not by Payar.

For the purposes of this Privacy Policy, a 'Client' means a venue operator, outlet operator or other business using the Platform, as defined in our Terms and Conditions.

### Your Consent

By using our services, websites, portals and/or our applications, you agree with the terms of this Privacy Policy and whenever you submit information to us or authorize a third party to provide it to us you consent to the collection, use and disclosure of that information in accordance with this Privacy Policy.

Where required by applicable data protection laws, we process personal information on one or more of the following legal grounds:

- where processing is necessary to perform a contract with you or to take steps at your request before entering into a contract;
- where processing is necessary for compliance with a legal obligation;
- where processing is necessary for our legitimate business interests, provided those interests do not override your fundamental rights and freedoms; and
- where you have provided your consent, which may be withdrawn at any time by contacting us using the details set out in this policy.

### Active Collection of Information

Some areas of our operations require you actively to submit information for you to benefit from specific features. Some of this information may be personal (namely, information that can identify you, such as your name, address, phone number, or employment history). We collect such information when you choose to supply it to us directly or when it is provided to us via third party sources. You confirm that you will only enter information about yourself and that such information is true.

Please note that information you enter into a specific client branded application is shared with and accessible to the specific client operating that application (for example, if you place an order with "Client A", your information is shared only with "Client A" to facilitate that transaction). Your information is not shared with other clients in our ecosystem. Payar, as the platform provider, maintains access to all information collected across our various applications and portals and may use this information for operational and marketing purposes in line with this policy.

In many guest-facing transactions conducted through our applications and platforms, the venue or outlet operator acts as the data controller in respect of guest personal information, and Payar acts as a data processor providing the technology and operational services. In other circumstances, such as when we collect information directly through our own websites, recruitment processes, marketing activities, or business communications, Payar acts as the data controller. The precise roles will depend on the nature of the interaction and the applicable contractual arrangements in place.

### Passive Collection of Information

We may collect and process anonymous information about your visit to our websites and portals, such as some of the pages you visit and some of the searches you perform. We, along with our clients, venues, and outlet operators, also utilize tools such as Google Tag Manager (GTM) to track user interactions and platform performance. Such information is used by us and our clients to help improve the contents of the site and to compile, for internal market research purposes,



aggregate statistics about individuals using it. Because our platform is a service provided to these businesses, all information collected passively may be utilized by the relevant client for their own analytical and operational purposes. If you wish to obtain specific privacy information or exercise your rights regarding one of our clients, you should contact them directly. Their contact details are typically provided in the About section of the applications you may use.

This kind of anonymous information may be obtained through our use of "cookies". A "cookie" is a small piece of information stored on your device when you visit our websites, portals or applications.

We use cookies in two principal ways:

- "per session cookies", which operate only while you are using the Website or portals, do not store personal information, and are deleted when you close your browser; and
- "looker cookies", which store historic usage data to help personalise your experience and provide recommendations about products and services that may be of interest to you.

Most browsers allow you to refuse or disable cookies or prompt you before accepting them. Please note that disabling "per session cookies" may prevent our Website or portals from functioning correctly. For more information about cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

We may also use Internet tags in combination with cookies on our websites, portals and applications, including in online advertisements and on different pages, to measure visitor responses and the effectiveness of our campaigns. Third-party service providers involved in this process may collect anonymous aggregated data across multiple sites, and the servers used to store such data may be located inside or outside the United Kingdom and the UAE.

#### **Use of Information Collected**

Your personal information submitted or provided to us is used for operational purposes, for example:

Processing recruitment related information;

Responding to inquiries via a "contact us" page; Managing subscriptions to our newsletter;

Requesting and receiving user feedback. This may include feedback requests sent via WhatsApp to a phone number provided during a transaction. While such data is primarily linked to a specific transaction, by providing your phone number, you acknowledge it may be used for these feedback purposes.

We retain personal information only for as long as is reasonably necessary to fulfil the purposes set out in this Privacy Policy, including to satisfy legal, regulatory, tax, accounting, reporting, and audit requirements. Retention periods may vary depending on the type of information, the context in which it was collected, whether you are a guest user, client, outlet operator, supplier, or job applicant, and whether applicable laws require longer retention. When personal information is no longer required, we will securely delete or anonymise it in accordance with our internal policies and applicable laws.

#### **Sharing of Information**

When you process an order or interact with our software, your personal information (including name, phone number, and transaction details) is provided to the specific client (e.g., the venue or outlet operator) you are transacting with to enable them to process and fulfil your request. Please be aware that once this information is shared with that client, they may use any of this data for their own operational or marketing purposes in accordance with their own privacy policies. Payar does not control how clients use your data once it is in their possession.

We may also share your personal information with third party service providers (including service providers outside of the UK and the UAE). We utilize external business systems, such as HubSpot and Slack, to capture, store, and process information necessary for our operational, communication, and customer relationship management purposes. These service providers will only have access to the personal information needed to perform the relevant service and may not use your personal information for any other purpose. They will also be required to use your personal information strictly in accordance with data protection laws, including



maintaining adequate security measures to protect such personal information. We may also share your personal information with legal or regulatory authorities where we are lawfully requested or required to do so.

### **Security**

We take the security of your data very seriously. We employ physical, electronic and administrative security measures to protect the information that we collect about you from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage. You acknowledge and agree that we shall not be responsible for any unauthorised use, distribution, damage or destruction of personal data, except to the extent we are required to accept such responsibility by the applicable data protection laws.

### **Payment Card information**

Payar does not collect, process, or store Payment Card Data (defined as a cardholder's account number, expiration date and CVV2). All payment functionality is provided via secure integrations with third party payment processors. When you enter payment details, you are providing that information directly to these third-party providers via their secure hosted modules or i-frames. These providers are independently responsible for maintaining PCI DSS compliance and the security of your Card Data while in their possession.

### **Children's Information**

Our services are not intended for individuals under the age required by applicable law. We do not knowingly collect personal information from children without appropriate parental or guardian consent where required by law.

Where guest-facing services are provided at venues or outlets that may serve minors, the relevant venue or outlet operator is responsible for ensuring that any required parental consents are obtained in accordance with their own privacy policies and applicable laws.

If you believe that a child has provided personal information to us without the appropriate consent, please contact us using the details in this policy and we will take appropriate steps to investigate and, where required, delete such information.

### **Links to third party Internet sites**

Our websites, portals and/or our applications may contain links to other sites. By clicking on these, you will leave our platform, and this Privacy Policy will not apply to your use of any other sites.

### **Changes to this Privacy Policy**

There may be developments in how we use your data. All such developments will be notified to you by updating this Privacy Policy.

### **Access to Personal Information**

You are entitled to see the personal information we hold about you and may obtain these details by writing to us at the addresses below. Where Payar acts as a data processor on behalf of a Client, you may need to contact the relevant Client directly to exercise your rights in relation to that Client's processing activities.

### **United Kingdom**

The Director(s)  
Payar Limited  
6th Floor Manfield House  
1 Southampton Street  
London, United Kingdom  
WC2R 0LR

### **Europe, the Americas, Middle East, Africa, Asia and Australasia**

The Director(s)  
Payar Technologies FZ-LLC  
DQuarters, DMC05  
Dubai Media City  
Dubai, United Arab Emirates

We may require proof of your identity before we supply the information to you. Depending on your location and applicable law, you may have certain rights in relation to your personal information, including the right to request correction or deletion of your data, restrict or object to certain types of processing, request portability where technically feasible, withdraw consent where processing is based on consent, and lodge a complaint with a relevant data protection authority. Requests to exercise these rights may be made using the contact details set out in this Privacy Policy.