Privacy Policy for the App Users

Preamble

The service consisting of the Choco App, Choco web tool and their ancillary related services (together hereinafter "App") is provided by Choco Communications UK Ltd, a company incorporated in England and Wales with registered number 13937613 whose registered office is at 6th Floor, One London Wall, London, EC2Y 5EB, and Choco Communications GmbH, whose registered office is at Wrangelstraße 100, 10997 Berlin, Germany, both of which may be contacted by email at legal@choco.com, (together hereinafter "Choco", "we" or "us") as joint controllers within the meaning of the applicable data protection law, namely (i) EU Regulation 2016/679 ("GDPR"); (ii) GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 (the "UK GDPR"); (iii) any laws or regulations ratifying, implementing, adopting, supplementing or replacing the GDPR; (iv) in the UK, the Data Protection Act 2018 ("DPA"); (v) any laws and regulations implementing or made pursuant to EU Directive 2002/58/EC (as amended by 2009/136/EC); and (vi) in the UK, the Privacy and Electronic Communications (EC Directive) Regulations 2003; in each case, as updated, amended or replaced from time to time. The terms "data subject", "personal data", "processing", "processor" and "controller" shall have the meanings set out in the DPA.

Choco Communications UK Ltd, and Choco Communications GmbH together determine, within a separate agreement, the purposes and means of the personal data being processed in accordance with Art. 26 of UK GDPR. If you wish to receive an extract of such agreement, please send your request to datenschutz@choco.com.

The App provides its users with access to messaging and ordering services, which may allow commercial customers from the gastronomy and food sector (hereinafter the "**Buyers**") to communicate directly with their suppliers (hereinafter the "**Vendors**") and place orders directly receivable by the Vendors and bundled in digital form without any delay.

When operating the App, we process your personal data. The protection of your privacy when using the App is important to us, therefore we would like to inform you especially about the scope, the legal basis, data subject rights and the personal data which we process when you use the App.

1. Information on the processing of your personal data

Certain information is already processed automatically by us as soon as you use the App. The personal data that we may process is indicated in detail below:

1.1 Information collected during download

When downloading the app, Choco does not require nor collect any personal data of yours, nevertheless, we would like to inform you that certain required information might be requested by the App Store selected by you

(e.g. Google Play or Apple App Store). The processing of this data, which takes place exclusively by the respective App Store, is beyond our control and we are not responsible for damages that occur to you arising from the data processing which is carried out by the App Store which you selected to download the App from.

1.2 Information collected automatically

As part of your use of the App, we automatically collect certain personal data that is necessary for the use of the App. This includes: device information, the version of your operating system, the type of device you use, your time of access, and your IP address. This data is automatically transmitted to us and stored in our servers, in order to:

- (i) Provide the App to you;
- (ii) Improve the functions and performance features of the App; and
- (iii) Prevent and remove misuse and malfunctions of the App.

With regard to clause 1.2 (i) of this Privacy Policy, we process your personal data on the basis that such processing is necessary for the performance of the services foreseen in the General Terms and Conditions, between you as the data subject and us, in accordance with Article 6.1(b) of UK GDPR.

With regard to clauses 1.2 (ii) and (iii) of this Privacy Policy, we also have a legitimate interest in ensuring the functionality and error-free operation of the App and being able to offer a service in line with the market and your interests. Our legitimate interest here outweighs your rights and interests in the protection of your personal data within the meaning of Article 6.1(f) of UK GDPR.

1.3 Creation of a user account (registration) and login

1.3.1 For the creation of a user account, you are required to complete a registration form in the App and accept the General Terms and Conditions, for this purpose information marked as mandatory in the registration form shall be filled in. **Mandatory Information** means your username, telephone number, email address, business name, and business address. The Mandatory Information is required for completing the registration form in the App, the creation of your user account, and the login, together with the acceptance of the General Terms and Conditions. If you do not provide the Mandatory Information, you will not be able to create a user account.

We process the Mandatory Information to authenticate you when you log in. The data entered by you during the registration, or login will be processed by us to:

- (i) Verify your authorization to manage the user account;
- (ii) Enforce the terms of use of the App and all associated rights and obligations; and
- (iii) Send you technical or legal notices, updates, security messages or other messages concerning the administration of the user account.

The processing of personal data contained within the Mandatory Information is justified by the fact that:

With regard to clause 1.3.1 (i) of this Privacy Policy, the data processing is necessary for the performance of the contract between you, as the data subject, and us, for the proper functioning of the App, in accordance with Article 6.1(b) of UK GDPR; and

With regard to clauses 1.3.1 (ii) and (iii) of this Privacy Policy, we have a legitimate interest in ensuring the functionality and error-free operation of the App as well as in contacting our users for any information relevant to them for the use of the App. Our legitimate interest here outweighs your rights and interests in protecting your personal data within the meaning of Article 6.1(f) of UK GDPR.

1.3.2 Furthermore, you can provide voluntary information during or after the registration on the App. You have the option of uploading pictures, screenshots, and additional text content to the App to simplify the communication and ordering process ("**Voluntary Information**"). Moreover, the content of the Voluntary Information which you may share with the App may vary depending on the type of data which you voluntarily upload to the App. Please note that we cannot accept any responsibility for any content that you voluntarily upload to the App, therefore, you are fully liable for any Voluntary Information, not required for the purpose of processing personal data, which infringes the applicable laws and/or any third parties' rights.

As per Article 6.1 (a) of UK GDPR, we will process the personal data contained within the Voluntary Information based on your consent which you can withdraw at any time in accordance with Article 7.3 of UK GDPR.

1.4 Use of the App

When using the App, you can enter, manage, and edit various information, tasks and activities. This information includes, in particular, data related to the communications that the Buyers send, together with their orders, to their Vendors which are directly received by the latter and bundled in digital form without any delay. For the use of the App, you may be requested to activate the following functions:

- (i) **Internet access**. This is a basic requirement for the use of the App, without access to the Internet you will not be able to communicate with your clients or Vendors, nor store your entries on our servers.
- (ii) Camera access. This access is not mandatory for the use of the App, nevertheless it may improve the communications between Buyers and Vendors as well as allow you to include pictures and/or screenshots to simplify the order process and store them in the App and on our servers. By granting access to your camera, you agree that Choco will have access to your pictures and media contents, thus data processing in this context is based on your consent [Article 6.1 (a) of UK GDPR]. Furthermore, we would like to inform you that currently the pictures and/or screenshots, which you may voluntarily upload to the App, will not be automatically deleted from the App. Nevertheless, if you wish to delete your uploaded pictures and/or screenshots, you may forward your request to the Choco Legal Team, using the following email address: datenschutz@choco.com (this does not affect the general rules on the deletion of data in the event of cancellation of your user account according to clause 5 of this Privacy Policy).

The processing of the above-mentioned data is based on your consent, as per Article Article 6.1 (a) of UK GDPR, which you can withdraw at any time, in accordance with Article 7.3 of UK GDPR.

(iii) Contact list access. You have the option of adding team members to your account directly from the contact list on your phone. For this, we need your permission to access your contact list. If you give permission, we will access the names and phone numbers in your contact list and display them to you. We'll also check if any of your contacts are already using Choco and display this information as well. We will continue accessing your contact list until you withdraw your permission. We do not store your contact lists on our servers. We only store the information (name and phone number) of your contacts who are already Choco users and the ones that you have invited to use Choco.

If you're a Restaurant user, you can also give us permission to access your contact list when adding contact details of your supplier's sales representative. The same terms above apply in that case.

This access is not mandatory for using the App and the processing of the above-mentioned data is based on your consent, as per Article Article 6.1 (a) of UK GDPR, which you can withdraw at any time, in accordance with Article 7.3 of UK GDPR.

1.5 Vendor's information obtained from the Buyer

In accordance with this Privacy Policy and our General Terms and Conditions, the Buyer may provide us with the contact details of a Vendor for the purpose of simplifying the placement of its orders. Such contact details may contain the personal data of a Vendor that will be processed by us albeit without being obtained from the data subjects. Pursuant to Article 14 of UK GDPR, please find below the information and the principles regulating the processing of such personal data.

- 1. The identity and the contact details of the data controller of the Vendor's personal data is indicated in the preamble of this Privacy Policy;
- 2. Please refer to clause 8 of this Privacy Policy for the contact details of the data protection officer;
- 3. Choco will process the Vendor's personal data in order to allow each Buyer to communicate and/or place orders directly receivable by its Vendors and bundled in digital form without any delay, the data processing will hence based on our legitimate interest to provide the correct functionality of the App which here outweighs your rights and interests in the protection of your personal data within the meaning of Art. 6. 1 (f) of UK GDPR. Please note that as a data subject, you have the right to object at any time;
- 4. Choco may process personal data attributable to the Vendor's personnel, that may consist of names, email addresses, addresses, and phone numbers;
- 5. Choco may disclose the Vendor's personal data to the recipient listed within clause 2 of this Privacy Policy;
- 6. Choco may transfer the Vendor's personal data to recipients located in third countries outside the UK or the European Economic Area ("**EEA**"), in accordance with clause 3 of this Privacy Policy;
- 7. The Vendor's personal data will be stored in the same manner described by clause 5 of this Privacy Policy;
- 8. If you are data subject with regard to the Vendor's personal data, you are entitled to the following rights according to Art. 15 21, 77 of UK GDPR, please refer to clause 7 of this Privacy Policy for

more information;

9. In order to improve our App and your user experience, Choco uses analysis tools, and other operational tasks aiming to ensure the functionality of the App in accordance with clause 4 of this Privacy Policy. Nevertheless, please note that for the processing of your personal data there is NO type of automated decision-making process, pursuant to Art. 22 of UK GDPR.

2. Disclosure and transfer of data

For the data processing during the registration, creation of the user account, and your general use of the App, Choco is the data controller. Nevertheless, we transfer your personal data to recipients on the condition a legal basis exists and/or you gave your consent to the data process. Any third parties with whom we share your personal data are limited (by law and by contract) in their ability to use your personal information. We will ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this Privacy Policy and applicable laws.

We transfer your data to the following recipients:

2.1 The Choco Group

The data provided by you during registration will be passed on within the Choco Group for internal administrative purposes, including joint customer support, as far as necessary.

2.2 Your Vendors (this section applies to you only if you are a Buyer)

We may share your personal data with the Vendors, with whom you have freely decided to communicate and/or to place your orders via the App. In such case, your Vendors and Choco will act as independent data controllers with regard to the processing of your personal data, hence each data controller is directly responsible to comply with the requirements of the applicable data protection law. The processing of your personal data, carried out by the Vendor in this regard is beyond our control, and we reject any responsibility for damages that occurred to you arising from the data processing carried out solely by the Vendor you have freely selected for your communications or for the placement of your orders.

- **2.2.1** In connection with our operation of the App and the Vendor's use thereof, please note that your Vendor may further request Choco to perform integration services for the creation of a technical infrastructure enabling your Vendor to transfer orders digitally from the App directly into its ordering system and to confirm them electronically (hereinafter "**Integrated Services**"). Only if subject to the Integrated Services, your personal data will be further processed as set out by section 2.2.2 of this Privacy Policy.
- **2.2.2** Your Vendor and Choco will enter into an agreement as joint controllers within the meaning of Article 26 of UK GDPR, and they will together determine the purposes and means of the personal data being processed only for the performance of the Integrated Services. Please click here for more information about the processing of your personal data pursuant to Art. 13 of UK GDPR, while the essence of such joint controllership agreement is here available.

2.3 Your employer

Please note, that if you are using the App in connection with your role as an employee or contractor of a company or other legal entity, we may share your personal data with such entity.

2.4 Third parties that assist us in providing its services to you

We share your personal data with third parties who assist us in providing our customer services and facilitating our communications with individuals that submit inquiries. We engage third-party service providers that perform business or operational services for us or on our behalf, including infrastructure provisioning, IT services, and administrative services. A list with complete details about the above-mentioned third-party service providers is available in Annex I of this Privacy Policy.

2.5 Third parties that provide us with Analysis Tools

We share your personal data with third parties who assist us with tools for the statistical recording and analysis of general usage behavior on the basis of access data. For more information and the complete list of these companies, please refer to clause 4 ("Analysis tools") and Annex II of this Privacy Policy.

2.6 Competent authorities

We are under a duty to disclose your personal data in order to comply with any legal obligation or lawful request by a government or law enforcement authority, as such disclosure may be required to meet national security or law enforcement requirements, or to prevent illegal activities. Any disclosure of the personal data will be justified by the fact that the processing is necessary to fulfill a legal obligation to which we are subject in accordance with Article 6.1(c) of UK GDPR in the national legal requirements for the disclosure of data to law enforcement authorities

2.7 Legitimate Third Parties

We may disclose your personal data to third parties in order to enforce the App's terms of use, our terms and conditions for customers or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, or to protect the safety of any person or to prevent any illegal activity. Any disclosure of the personal data is justified by the fact that we have a legitimate interest in using the data in the presence of evidence of abusive behavior or to enforce our terms of use, of other conditions or legal claims to the aforementioned third parties and your rights and interests in relation to the protection of your personal data within the meaning of Article 6.1(f) of UK GDPR do not prevail.

2.8 New entities as a result of corporate restructuring

In the context of the further development of our business, the structure of our company may change by changing the legal form, founding, acquiring, or transferring subsidiaries, parts of companies or components. In accordance with such operations, the customer information may be shared together with the part of the company to be transferred. Each time personal data is transferred to third parties to the extent described above, we shall ensure that this transfer is done in accordance with this Privacy Policy and the UK GDPR. Any

disclosure of personal data is justified by the fact that we have a legitimate interest in adapting our corporate form to the economic and legal circumstances if necessary, and your rights and interests in the protection of your personal data within the meaning of Article 6.1(f) of UK GDPR do not prevail.

3. Data transfer to third countries

- 3.1 We may share your personal data to members of the Choco Group or third party service providers who are outside the UK or the EEA. If we provide any personal data about you to any such non-UK and non-EEA members of our group or suppliers, we will take appropriate measures to ensure that the recipient protects your personal data adequately in accordance with this Privacy Policy.
- 3.2 In particular, we would like to inform you that the EU-US Privacy Shield (adequacy decision) has been declared invalid and that in case of data transfers to insecure third countries (here, the USA), there is no adequate level of data protection according to EU and UK standards. In particular, there is a risk that your data may be processed by U.S. authorities, for control and for monitoring purposes, possibly also without any legal remedy.
- **3.3.** If we provide any personal data about you to any such non-UK and non-EEA members of our group or suppliers, we will take appropriate measures to ensure that the recipient of your personal data protects it adequately in accordance with this Privacy Policy. We have concluded with service providers based in third countries, depending on the contractual constellation, either a data processing agreement according to Art. 28 of UK GDPR or a joint controllership agreement according to Art. 26 of UK GDPR, moreover, we ensure that the recipient of your personal data may adequately protect it, namely by:
 - (a) Ensuring that there is an adequacy decision by the UK Government in the case of transfers out of the UK, or by the European Commission in the case of transfers out of the EEA, which means that the recipient country is deemed to provide adequate protection for such personal data;
 - (b) Where we have in place standard model contractual arrangements with the recipient which have been approved by the European Commission or the UK Government for transfers outside the UK. These model contractual clauses include certain safeguards to protect the personal data.
- **3.4** In case of data processing in the context of the use of analysis tools, clause 4 of this Privacy Policy, the data processing is based on your consent which you can revoke at any time with effect for the future, Art. 49.1 (a) of UK GDPR.

4. Analysis tools

In order to improve our App and your user experience, we use tools for the statistical recording and analysis of general usage behavior on the basis of access data ("**Analysis tools**"). Please note that for the processing of your personal data, there is NO type of automated decision-making process, pursuant to Art. 22 of UK GDPR. Unless otherwise stated, the legal basis for the Analysis tools is our legitimate interest in accordance with Art. 6.1 (f) of UK GDPR. For the complete list of the third-party providers of Analysis tools used by Choco, please refer to Annex II of this Privacy Policy.

5. Storage duration

We delete your personal data as soon as the purposes for which we processed it, in accordance with the preceding paragraphs, are achieved, and no statutory requirements require us to continue storing it for a longer period of time. We delete your personal data as soon as you submit to us your request for the cancellation of your user account, for the purposes for which we collected or used it in accordance with the preceding paragraphs. Please note that in case of cancellation of your user account, your personal data stored within the App will be deleted insofar as there are no statutory requirements which require us to continue storing it for a longer period of time.

6. Hyperlink

Our App contains hyperlinks to third-party websites. If these hyperlinks are activated, you will be redirected from our App directly to the websites of third-party service providers. You can recognize this, amongst other things, by the changing URL. We cannot accept any responsibility for the confidential handling of your data on these third-party websites, nor for their compliance with the UK GDPR, which is beyond our control. Please refer directly to those websites for information about their handling of your personal data.

7. Your rights as a data subject

- **7.1** In accordance with Articles 15 to 21 (inclusive) and 77 of UK GDPR, as data subjects you have the following rights:
 - Right of access by the data subject (Article 15 of UK GDPR)
 - Right to rectification (Article 16 of UK GDPR)
 - Right to erasure "right to be forgotten" (Article 17 of UK GDPR)
 - Right to restriction of processing (Article 18 of UK GDPR)
 - Right to data portability (Article 20 of UK GDPR)
 - Right to object (Article 21 of UK GDPR)
 - Right not to be subject to a decision based solely on automated processing (Article 22 of UK GDPR)
 - Right to lodge a complaint with a supervisory authority (Article 77 of UK GDPR).
- 7.2 In case the data processing is based on your consent, you have the right to withdraw your consent at any time, in accordance with Article 7.3 of UK GDPR. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. In case the data processing is based on our legitimate interest [Article 6.1(f) of UK GDPR], you have the right to object, on grounds relating to your situation, at any time.
- **7.3** Your requests for the assertion of data protection rights and our answers to them will be kept for documentation purposes for a period of up to three (3) years and, in individual cases, for longer periods for the

establishment, exercise or defense of legal claims in accordance with Article 6.1(f) of UK GDPR, which is based on our legitimate interest in:

- (i) Defending against any civil law claims pursuant to Article 82 of UK GDPR;
- (ii) The avoidance of fines pursuant to Article 83 of UK GDPR; and
- (iii) The fulfillment of our accountability under Article 5.2 of UK GDPR.
- **7.4** As a data subject you have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data relating to you infringes the UK GDPR. The data protection authority responsible for Choco's processing of personal data in the UK is the Information Commissioner's Office.

8. Data Protection Officer and contact details

- **8.1** If you have any questions, comments or complaints about our handling of your personal data, or if you wish to exercise your data subject rights, please contact the Choco Legal Team using the following contact details: datenschutz@choco.com.
- **8.2** Furthermore, you are welcome to direct your data protection concerns to our Data Protection Officer by sending an email to the above-mentioned email address. Please note that emails to the above email address will not solely be received by our Data Protection Officer as this is a generic email for the Choco Legal Team. If you solely wish to contact our Data Protection Officer and/or if you wish to send confidential information, please refer to the Data Protection Officer in the subject line or body of your email and please ask for them to contact you directly to further discuss your data protection concerns.

9. Changes to this Privacy Policy

We always keep this privacy policy up to date. Therefore, we reserve the right to update or change it from time to time and to maintain these changes in the processing of your personal data.

Annex I

Third-party service providers Performing business or operational services, infrastructure provisioning, IT services, and administrative services for Choco or on Choco's behalf.

Aircall SAS

- Address: 11 Rue Saint-Georges, 75009 Paris, France.
- Personal data processed: Username, phone number, and Email Address.
- Storage Information: The servers storing your personal data are located in the Amazon Web Services US West servers in Oregon, USA. Your Personal Data will be stored by the service provider as long as

necessary for the provision of the Services.

Amazon Web Services, Inc.

- Address: 410 Terry Avenue North, Seattle, WA 98109, United States of America.
- Personal data processed: Username, Phone number, Business Address, IP Address, Device Info, and Email Address.
- Storage Information: The servers storing your personal data are located in Ireland. Your Personal Data will be stored by the service provider as long as necessary for the provision of the Services.

Dovetail Research Pty. Ltd.

- Address: Level 1, 276 Devonshire Street, Surry Hills, 2010, NSW, Australia.
- Personal data processed: Username, and Email address.
- Storage Information: The servers storing your personal data are located in AWS us-east-1 region located in North Virginia, United States. Your personal data will be stored by the service provider as long as necessary for the provision of the services to Choco.

Google Ireland Limited (reCAPTCHA Enterprise)

- Address: Gordon House, Barrow Street, Dublin 4, Ireland.
- Personal data processed: Username, Phone number, IP Address, Device Info, and Email Address.
- Storage Information: The servers storing your personal data are located in Dublin, Ireland. Your personal
 data will be stored by the service provider as long as necessary for the provision of the services to
 Choco. Google Ireland Limited may transfer personal data to Google Inc, their parent company in the
 USA.

Intercom, Inc.

- Address: 3rd Floor, Stephens Ct., 18-21 St. Stephen's Green, Dublin 2, Ireland.
- Personal data processed: Username, Phone number, IP Address, Email Address, and Device info.
- Storage Information: The servers storing your personal data are located in the Amazon Web Services
 (AWS) facilities in Dublin, Ireland (eu-west-1). Your Personal Data will be stored by the service provider
 as long as necessary for the provision of the Services.

Invisible Technologies, Inc.

- Address: 548 Market Street #85820 San Francisco, CA, USA.
- Personal data processed: Username, Phone number, Email Address, Address, and Financial Info.

Storage Information: The servers storing your personal data are within the Amazon Web Services (AWS)
us-east-1 region located in North Virginia, United States, and the Google Cloud Platform facilities of
Mountain View, California, USA (us-west-1). Your Personal Data will be stored by the service provider as
long as necessary for the provision of the Services.

Lobster DATA GmbH

- Address: Hindenburgstraße 15, 82343 Pöcking, Germany.
- Personal data processed: Address, Email address, Fax Number (only when previously provided by the user), Phone number, and Username.
- Storage Information: The servers storing your personal data are located in Germany. Your personal data will be stored by the service provider as long as necessary for the provision of the services to Choco.

Salesforce.com Germany GmbH

- Address: Erika-Mann-Str. 31, 80636 Munich, Germany.
- Personal data processed: Username, Address, Phone number, and Email Address.
- Storage Information: The servers storing your personal data are located in Frankfurt am Main, Germany, and Paris, France. Your Personal Data will be stored by the service provider as long as necessary for the provision of the Services.

Sentry, owned by Functional Software, Inc.

- Address: Functional Software, Inc. dba Sentry, 45 Fremont Street, 8th Floor, San Francisco, CA 94105, United States.
- Personal data processed: Username, Address, Device info, Email address, Phone number, and IP Address.
- Storage Information: The servers storing your personal data are located in Iowa, USA. Your Personal
 Data will be stored by the service provider as long as necessary for the provision of the services to
 Choco.

Talend Stitch Inc.

- Address: 1339 Chestnut St #1500, Philadelphia, Pennsylvania 19107, United States.
- Personal data processed: Username, Phone number, IP Address, Device Info, and Email Address.
- Storage Information: The servers storing your personal data are located in Frankfurt am Main, Germany, in the AWS eu-central-1 servers. Your Personal Data will be stored by the service provider as long as necessary for the provision of the Services.

The Rocket Science Group LLC d/b/a Mailchimp

- Address: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 3030, United States.
- Personal data processed: Username, Phone number, IP Address, Device Info, and Email address.
- Storage Information: Mailchimp provides an email service, automation and marketing platform and other
 related services. The servers storing your personal data are located in the United States of America.
 Your personal data will be stored by the service provider as long as necessary for the provision of the
 services to Choco.

Annex II

The third-party providers of Analysis tools which are used by Choco are as follows:

Amplitude, Inc.

- Address: 201 3rd Street, Suite 200, San Francisco, CA 94103, United States.
- Personal data processed: Username, Phone number, IP Address, Device Info, and Email address.
- Storage Information: Personal data is logically separated using multiple techniques. All data is stored in an Amazon Web Services in the US region. We require this provider's service for operational reasons, namely, to reach out to the users who are affected by an incident which impedes the correct functionality of the App.Your personal data will be stored by the service provider as long as necessary for the provision of the services to Choco.

Google Cloud EMEA Limited (Looker)

- Address: 70 Sir John Rogerson's Quay, Dublin 2, Ireland.
- Personal data processed: Username, Phone number, IP Address, Device Info, and Email address.
- Storage Information: The servers storing your personal data are located in the EEA. Your personal data will be stored by the
 service provider as long as necessary for the provision of the services to Choco. Google Cloud EMEA Limited may transfer
 personal data to Google LLC, its parent company in the USA.

Google Ireland Limited (Google Analytics)

- Address: Gordon House, Barrow Street, Dublin 4, Ireland.
- Personal data processed: Username, Phone number, IP Address, Device Info, and Email address.
- Storage Information: The servers storing your personal data are located in Dublin, Ireland. Your personal
 data will be stored by the service provider as long as necessary for the provision of the services to
 Choco. Google Ireland Limited may transfer personal data to Google LLC, its parent company in the USA.

Segment.io, Inc.

- Address: 100 California St, Suite 700, San Francisco, CA 94103, United States.
- Personal data processed: Username, Phone number, IP Address, Device Info, and Email address.

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