

Last Updated: May 30, 2019

## **Spring Shabu-Shabu™ Website Privacy Policy**

### **Summary**

Thank you for visiting the Spring Shabu-Shabu™ website located at [www.springshabu.com](http://www.springshabu.com) (the "**Site**"), owned and operated by Masheta Group Ltd. ("**Spring™**," "**we**," "**our**" or "**us**"). The following Spring Shabu-Shabu™ Website Privacy Policy ("**Privacy Policy**") sets forth our policy with respect to the collection, storage and use of your personal information and other information that we collect from you. **Please note, if you are a resident of a European Union Member State ("**EU Resident**"), you are not permitted to use the Site and/or Spring™ Offerings (as defined below).**

### **Background**

This Privacy Policy covers our treatment of personal information and other information that we collect when an end-user visitor to the Site ("**User**," "**you**" or "**your**"): (a) accesses or uses the Site; (b) accesses and/or downloads any of the menus, text, audio, video, photographs, graphics, artwork, testimonials and/or other content featured on the Site (collectively, "**Content**"); (c) registers to receive the Spring™ newsletter ("**Newsletter**"); (d) accesses links to Spring's™ social media pages/accounts on third-party social media websites, such as Facebook® and Instagram® (collectively, "**Social Media Pages**"); (e) enters one of the promotions, sweepstakes and/or contests featured on the Site from time-to-time (collectively, "**Promotions**"); (f) obtains information regarding employment opportunities with Spring™ ("**Career Opportunities**"); and/or (g) utilizes the various contact forms and/or contact information made available on the Site as a means to contact directly, or request to be contacted by, Spring™ (collectively, the "**Contact Services**," and together with the Site, Content, Newsletter, Social Media Pages, Promotions and Career Opportunities, the "**Spring™ Offerings**").

**IF YOU DO NOT AGREE TO TERMS OF THIS PRIVACY POLICY IN THEIR ENTIRETY, YOU MAY NOT ACCESS OR OTHERWISE USE THE SPRING™ OFFERINGS.**

*Instagram® and Facebook® are registered trademarks of Facebook, Inc. ("**Facebook**"). Please be advised that Spring™ is not in any way affiliated with Facebook, nor are the Spring™ Offerings endorsed, administered or sponsored by Facebook.*

### **Your California Privacy Rights**

**Spring™ will never share, sell, rent, exchange or barter your "personal information" (as defined in the Shine the Light Law, Cal. Civ. Code § 1798.83) to or with any third-party for financial gain or marketing purposes. Nevertheless, we may, in certain limited instances, share your personal information with third parties who perform administrative functions on our behalf. If you are a resident of the State of California and would like to learn how your personal information is shared with third parties, what categories of personal information that we have shared with third parties in the preceding year, as well as the names and addresses of those third parties, please e-mail us at: [info@springshabu.com](mailto:info@springshabu.com); or send us U.S. mail to: Spring Shabu-Shabu, P.O. Box 5514, Englewood, NJ 07631.**

### **Personal Information Collected**

We collect personal data when you access certain of the Spring™ Offerings and complete the required information request form and/or otherwise provide such information to us. The information that you must supply on the applicable form may include, without limitation: (a) your name; (b) your mailing address; (c)

your e-mail address; (d) your telephone number; (e) driver's license number, state and date of expiration (where you are submitting an application in connection with the Career Opportunities); (f) whether or not you are a veteran and, if so, your dates of service (where you are submitting an application in connection with the Career Opportunities); (f) your desired position, special skills or training, your restaurant location of interest and other employment-related information (where you are submitting an application in connection with the Career Opportunities); and/or (g) any other information requested by us on the Form.

For purposes of this Privacy Policy, item (e) in the preceding sentence shall be referred to as "Sensitive Data."

### **Use of Personal Information**

Spring™ will never share, sell, rent, exchange or barter your personal information to or with any third party for financial gain or marketing purposes. By making that personal information available to Spring™, you grant Spring™ the right, subject to applicable law, to use that personal information to contact you regarding your use of the Spring™ Offerings and/or with information regarding other Spring™ and third-party products and/or services that we think may be of interest to you. If you wish to stop receiving future communications from us, please follow the instructions at the end of each such e-mail message or see the "Opt-Out/Unsubscribe" section below.

Where you submit personal information, we use the personal information that you make available to personalize your experience with the Site and to facilitate the delivery of the applicable Spring™ Offerings to you, including in connection with customer service and to otherwise respond to any inquiries made by you.

You also agree that we may contact you at any time with updates and/or any other information that we may deem appropriate for you to receive in connection with your continued use of the Spring™ Offerings.

We may also employ other companies and individuals to perform certain functions on our behalf. Examples include sending direct and electronic mail, removing duplicate information from User lists, analyzing data and providing marketing analysis. The agents performing these limited functions on our behalf shall have access to our Users' personal information as needed to perform these functions for us, but we do not permit them to use User personal information for other purposes.

We may also use your personal information for internal business purposes, such as analyzing and managing our service offerings including, without limitation, the Spring™ Offerings. We may also combine the information we have gathered about you with information from other sources.

By submitting your personal information by and through the Spring™ Offerings, you agree that such act constitutes an inquiry and/or application for purposes of the Amended Telemarketing Sales Rule (16 CFR §310 et seq.), as amended from time to time (the "Rule") and applicable state do-not-call regulations. As such, notwithstanding that your telephone number may be listed on the Federal Trade Commission's Do-Not-Call List, and/or on applicable state do-not-call lists, we retain the right to contact you via telemarketing in accordance with the Rule and applicable state do-not-call regulations.

Where you provide "prior express written consent" within the meaning of the Telephone Consumer Protection Act (47 USC § 227), and its implementing regulations adopted by the Federal Communications Commission (47 CFR § 64.1200), as amended from time-to-time ("TCPA"), you consent to receive telephone calls from Spring™, including artificial voice calls, pre-recorded messages and/or calls (including SMS text messages) delivered via automated technology, to the telephone number(s) that you provided. Please note that you are not required to provide consent under the TCPA in order to obtain access to the Spring™ Offerings, and your consent simply allows Spring™, as well as the designated Third-Party Service Providers, to contact you via these means. **Please be advised that by agreeing to this Privacy Policy, you are obligated to immediately inform us if and when the telephone number**

that you have previously provided to us changes. Without limiting the foregoing, if you: (a) have your telephone number reassigned to another person or entity; (b) give up your telephone number so that it is no longer used by you; (c) port your telephone number to a landline or vice versa; or (d) otherwise stop using that telephone number for any reason (collectively "Phone Number Change"), you agree that you shall promptly notify Spring™ of the Phone Number Change via e-mail at: [info@springshabu.com](mailto:info@springshabu.com), or by using one of the methods set forth in the "Contact Us" section below.

We reserve the right to release current or past personal information (including Sensitive Data): (i) in the event that we believe that the Spring™ Offerings are being or have been used to commit unlawful acts; (ii) if the information is subpoenaed or requested pursuant to any court order or legal proceeding; *provided, however*, that, where permitted by applicable law, we shall provide you with e-mail notice, and opportunity to challenge the subpoena/court order, prior to disclosure of any personal information pursuant to a subpoena; or (iii) if we are sold, merge with a third-party, are acquired or are the subject of bankruptcy proceedings; *provided, however*, that if Spring™ is involved in a bankruptcy proceeding, merger, acquisition or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on the Site of any change in ownership or uses of your personal information, as well as any choices that you may have regarding your personal information.

You hereby consent to the disclosure of any record or communication to any third-party when we, in our sole discretion, determine the disclosure to be required by applicable law, including sharing your e-mail address with third-parties for suppression purposes in compliance with the CAN-SPAM Act of 2003, as amended from time to time, and other e-mail marketing laws. Users should also be aware that courts of equity, such as U.S. Bankruptcy Courts, might have the authority under certain circumstances to permit personal information to be shared or transferred to third-parties without permission.

## **Non-Personal Information Collection and Use**

### IP Addresses/Browser Type

We may collect certain non-personally identifiable information about you and your desktop computer and/or mobile device when you visit many of the pages of the Site. This non-personally identifiable information includes, without limitation, the type of browser that you use (e.g., Safari, Chrome, Internet Explorer), your IP address, the type of operating system that you use (e.g., Windows or iOS) and the domain name of your Internet service provider (e.g., Verizon, AT&T). We use the non-personally identifiable information that we collect to improve the design and content of the Spring™ Offerings and to enable us to personalize your Internet experience. We also may use this information in the aggregate to analyze usage of the Spring™ Offerings.

### Cookies

When a User visits the Site, we send one (1) or more cookies and/or gif files (collectively, "Cookies") to assign an anonymous, unique identifier to the applicable User's computer. A Cookie is a piece of data stored on your hard drive containing non-personally identifiable information about you. Cookies have many benefits to enhance your experience at the Site. To find out more about Cookies, please visit [www.cookiecentral.com](http://www.cookiecentral.com). We use Cookies to improve the quality of the Spring™ Offerings, including for storing User preferences and tracking Site-User trends (such as pages opened and length of stay at the Site).

Most Internet browsers are initially set up to accept Cookies, but you can reset your browser to refuse all Cookies or to indicate when a Cookie is being sent. To disable and reject certain Cookies, follow the instructions associated with your Internet browser. Even in the case where a User rejects a Cookie, she or he may still use the Spring™ Offerings; *provided, however*, that certain Spring™ Offerings-related functions may be impaired or rendered inoperable if the use of Cookies is disabled. We reserve the right to retain Cookie data indefinitely.

### Behavioral Tracking

Neither Spring™, nor any third party, uses cookies, pixels or other tracking technology on the Site for purposes of tracking Users' activities after they leave the Site. Nevertheless, most Internet browsers and mobile devices contain a "do-not-track" setting. In general, when a "do-not-track" setting is active, the end-user's Internet browser or mobile device notifies other websites or mobile applications that the end-user does not want her/his Information and online behavior to be tracked and used, for example, for behavioral advertising.

### Cross Device Tracking

Spring™ does not track Users' use of the Spring™ Offerings across multiple devices, including personal computers and mobile devices.

### Aggregate Data

Spring™ reserves the right to transfer and/or sell aggregate or group data about Users of the Spring™ Offerings for lawful purposes. Aggregate or group data is data that describes the demographics, usage and other characteristics of Spring™ Offerings Users as a group, without disclosing personally identifiable information.

## **Social Media Websites**

If you engage in any interaction with Spring™ or any third party on any Social Media Pages, you should be aware that: (a) the personal data that you submit by and through such Social Media Pages can be read, collected and/or used by other users of these websites/services (depending on your privacy settings associated with your accounts with the applicable Social Media Websites), and could be used to send you unsolicited messages or otherwise to contact you without your consent or desire; and (b) where Spring™ responds to any interaction on such Social Media Pages, your account name/handle may be viewable by any and all members of Spring's™ social media presence.

We are not responsible for the personal data that you choose to submit on any Social Media Websites. The Social Media Websites operate independently from Spring™, and we are not responsible for such Social Media Websites' interfaces or privacy or security practices. We encourage you to review the privacy policies and settings of the Social Media Websites with which you interact to help you understand those Social Media Websites' privacy practices. If you have questions about the security and privacy settings of any Social Media Websites that you use, please refer to their applicable privacy notices or policies.

## **Third-Party Websites**

This Site may contain links to third-party owned and/or operated websites including, without limitation, the Social Media Websites. Spring™ is not responsible for the privacy practices or the content of such websites. In some cases, you may be able to make a purchase through one of these third-party websites. In these instances, you may be required to provide certain information, such as a credit card number, to register or complete a transaction at such website. These third-party websites have separate privacy and data collection practices and Spring™ has no responsibility or liability relating to them.

## **Security**

**We endeavor to safeguard and protect our Users' personal information. When Users make personal information available to us, their personal information is protected both online and offline (to the extent that we maintain any personal information offline). Where our registration/application process prompts Users to enter Sensitive Data and when we store and transmit such Sensitive Data, that personal information is encrypted with advanced TLS (Transport Layer Security).**

Access to your personal information is strictly limited, and we take reasonable measures to ensure that your personal information is not accessible to the public. All of our Users' personal information is restricted in our offices, as well as the offices of our third-party service providers. Only employees or third-party agents who need User personal information to perform a specific job are granted access to User personal information. Our employees are dedicated to ensuring the security and privacy of all User personal information. Employees not adhering to our firm policies are subject to disciplinary action. The servers that we store User personal information on are kept in a secure physical environment. We also have security measures in place to protect the loss, misuse and alteration of personal information under our control.

Please be advised, however, that while we take every reasonable precaution available to protect your data, no storage facility, technology, software, security protocols or data transmission over the Internet or via wireless networks can be guaranteed to be 100% secure. Computer hackers that circumvent our security measures may gain access to certain portions of your personal information, and technological bugs, errors and glitches may cause inadvertent disclosures of your personal information; *provided, however,* that any attempt to breach the security of the network, our servers, databases or other hardware or software may constitute a crime punishable by law. For the reasons mentioned above, we cannot warrant that your personal information will be absolutely secure. Any transmission of data at or through the Site, other Spring™ Offerings or otherwise via the Internet or wireless networks, is done at your own risk.

In compliance with applicable federal and state laws, we shall notify you and any applicable regulatory agencies in the event that we learn of an information security breach with respect to your personal information. You will be notified via e-mail in the event of such a breach. Please be advised that notice may be delayed in order to address the needs of law enforcement, determine the scope of network damage, and to engage in remedial measures.

### **Minors**

Visitors under eighteen (18) years of age are not permitted to use and/or submit their personal information at the Site. Spring™ does not knowingly solicit or collect information from visitors under eighteen (18) years of age. Spring™ encourages parents and guardians to spend time online with their children and to participate and monitor the interactive activities of their children.

### **Opt-Out/Unsubscribe**

To opt-out of receiving e-mail and other forms of communications from us, you can: (a) follow the instructions included in the applicable e-mail message or other communication; or (b) e-mail us at: [info@springshabu.com](mailto:info@springshabu.com).

Notwithstanding the foregoing, we may continue to contact you for the purpose of communicating information relating to your request for Spring™ Offerings, as well as to respond to any inquiry or request made by you. To opt-out of receiving Spring™ Offerings-related and/or inquiry response-related messages from Spring™, you must cease requesting and/or utilizing the Spring™ Offerings and/or cease submitting inquiries to Spring™, as applicable.

### **Individual Rights: Deleting, Modifying and Updating Your Personal Information**

At your request, we will: (a) inform you of what personal information we have on file for you, in a machine-readable format; (b) amend the personal information that we have on file for you; and/or (c) completely remove personal information that you have provided to us, or that we have collected, from our servers/databases. You may make such a request by e-mailing us at: [info@springshabu.com](mailto:info@springshabu.com). We ask

individual Users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests.

Please be advised that deleting your personal information may terminate your access to certain of the Spring™ Offerings. If you wish to continue using the full complement of Spring™ Offerings, you may not be able to delete all of the personal information that we have on file for you.

### **Transfer of Personal Information Internationally**

**If you are visiting the Site from a country other than the country in which our servers are located, your communications with us may result in the transfer of personal information across international boundaries. By visiting the Site and/or otherwise communicating electronically with us, you consent to such transfers. Even if your jurisdiction does not have the same privacy laws as the jurisdiction where our servers are located, we will treat your information as subject to the protections described in this Privacy Policy.**

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

Spring™ reserves the right to change or update this Privacy Policy at any time by posting a notice on the Site that we are changing our Privacy Policy. If the manner in which we use personal information changes, Spring™ will notify Users by: (a) sending the modified policy to our Users via email; and/or (b) by any other reasonable means acceptable under applicable state and federal law. You will have a choice as to whether or not we use your information in this different manner and we will only use your information in this different manner where you affirmatively consent to such use.

### **Contact Us**

If you have any questions about this Privacy Policy or our privacy practices in general, you may email us as at: [info@springshabu.com](mailto:info@springshabu.com); or send us mail to: Spring Shabu-Shabu, P.O. Box 5514, Englewood, NJ 07631.

### **Filing a Complaint with the Federal Trade Commission**

To file a complaint regarding our privacy practices, please click [here](#).