

Privacy Policy

Latest update on 03/05/2024

Thank you for using Bouquet! We are committed to providing you the best online shopping and delivery experience possible. This Privacy Policy explains how BTL Territories (“Bouquet”, “we”, or “us”) collect, use, and share your Personal Information. “Personal Information” is information about you that we collect when you join our waitlist, browse or **subscribe** for products or services on Bouquet platform, including any websites, mobile application, device, or API where this Privacy Policy is linked (the “Services”).

Notice to Ghanaian Residence: Bouquet collects Personal Information as described below in the “Information We Collect” section for the business and commercial purposes described below under “Information Use.” We describe our disclosures of Personal Information, including why and to whom we make them, below under “Information Disclosure.” As described in detail below, we “sell” or “share” (as defined in the Ghana Data Protection Act) certain categories of Personal Information and you may exercise your right to opt out of such disclosures by submitting your request [here](#).

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1. Information We Collect

a. Information you provide

We collect the following types of Personal Information directly from you:

Contact information. When you use or interact with the Services, we collect or obtain relevant contact details from you, including your name, address, telephone number and email address.

Account information. When you set up a Bouquet account, we collect your username and password, and other relevant information we request.

Check out information. If you place an order through the Services, we collect information necessary to fulfill the order, including your delivery address, the date and time of the order, the items you ordered and any special instructions.

Age and identity verification information. If you order alcohol, prescriptions, or other restricted orders, we collect information from your government ID to verify your age or your identity, including the government ID number and state or country.

Payment information. If you place an order through the Services, we collect your billing address and method of payment. Additional details regarding the processing of your payment information can be found below.

Information you make public. If you post in a public space on the Services or otherwise choose to make your Personal Information public on the Services (e.g., by sharing a recipe publicly on the Services), we collect such information. If you choose to share Personal Information publicly through the Services, please understand that we cannot control the actions of third parties who may access or collect this information.

Other information you provide to us. We collect any other information that you choose to provide, including your responses to surveys that you choose to participate in (for example your taste preferences or customer satisfaction surveys) and information that you provide during your interactions with our Services and customer service representatives. We may also collect information that you provide directly to us regarding an experience with one of our retail partners.

Information you provide about others. In some cases, you may provide information to us about other people. For example, you may refer a friend to Bouquet. In these cases, we may collect

the recipient's name, email, and delivery address. You may also participate in Family Accounts and provide us information about your association with another Bouquet customer. When you provide someone else's information via the Services, you are responsible for ensuring that you have permission to share their information with Bouquet. You may not provide personal information about children under the age of 16.

b. Information collected by automated means

When you use and interact with the Services, we automatically receive certain information about your device, browser, and/or activity:

Device and usage information. Our servers will record information about the device you use to connect to the Services and your usage of the Services.

Device and usage information. Our servers will record information about the device you use to connect to the Services and your usage of the Services. This information includes your device's IP address, your device type, browser type, internet service provider, operating system, and unique device identifiers. It also includes activity information, such as the frequency with which you use the Services, the duration of such usage, the pages that you navigate to, links that you click, information related to your shopping services for Instacart (such as orders accepted, items found, and items replaced), and other ways that you interact with the Services. We also may use third party services that employ software code to record users' interactions with the Services. Session replays include users' clicks, mouse movements, scrolls, and keystrokes/key touches during those sessions. These replays help us diagnose usability problems and identify areas for improvement.

Location Information. When you access the Services, we may collect information about your device's location. For instance, if you allow the Services to access location services through the permission system used by your device's operating system or browser, we may collect the precise location of your device. We use your location information to facilitate the prompt hand-off of pickup orders (where available), to assist you in finding nearby stores for which pickup or delivery are available, and for other similar purposes. We may also use such information for analytic purposes. You can choose whether or not your device's location information is shared with us by adjusting the settings on your device or browser, or when prompted by the Bouquet application. We may also infer your general location, for example by using your device's IP address.

Cookies, Pixels, and Other Tracking Technologies. When you interact with Bouquet, we (and our partners, advertisers, and third-party advertising networks) may automatically collect information about you using device identifiers, cookies, pixels, and similar technologies. We use this information for various purposes, including to: make Bouquet function properly; understand how you use the Services; personalize your experience; and measure, manage, display, and customize the advertisements you see. Our partners, advertisers, and third-party advertising networks may also use these technologies to collect information about your online activity over time and across different websites or online services. Browsers provide choices with respect to

these technologies. For example, by modifying your browser preferences, you have the choice to accept all cookies or to be notified when a cookie is set.

Analytics We use third-party analytics providers who may deploy cookies, pixels, and similar technologies to analyze traffic to the Services and understand the usage of the Services as well as the performance of advertisements. For example, we use Google Analytics, an analytics tool that helps us understand how our customers engage with the Services. To learn more about Google Analytics' data practices, please visit Google's support page.

Interest-Based or Online Behavioral Advertising. To make your experience on Bouquet more engaging, we may participate in interest-based advertising using cookies, pixels, and other tracking technologies. This means that you may see advertisements while using the Services that are tailored to you, or you may see advertisements for Bouquet on other online services, based on your use of the Services or your browsing behavior across other online services. Some services where we may advertise belong to ad networks that use your web browsing history to choose which advertisements to display on their network services, which may include advertisements from Bouquet. You can learn more about interest-based advertising, and navigate to options that will allow you to exercise your rights to opt-out of online behavioral advertising, by visiting the Network Advertising Initiative's Learn More Page or the Digital Advertising Alliance. In addition, some internet browsers, websites/platforms, and mobile devices allow you to exercise certain choices with respect to interest-based advertising. Please refer to the website that you are visiting, your browser, and/or your mobile device settings for additional information.

Please note that even if you opt-out using the tools listed above, you may continue to see advertisements from Bouquet and/or our partners; however, these advertisements will not be as relevant to you.

Do Not Track. "Do Not Track" ("DNT") is a developing standard for web browsers that aims to inform the websites you visit that you do not want information about your online activity collected over time and across third-party websites or online services. Although we do our best to honor the privacy preferences of our users, we do not interpret or respond to DNT or other similar signals from your browser at this time.

c. Information received from third parties

We may receive Personal Information about you from third parties. For example:

Third Party Services. If you log in to the Services through a third-party service, we may receive some information about you and your use of that third party service. For example, if you choose to log in to the Services with your Facebook or Google account, we may receive information from these companies, such as your name and email address.

Prescriptions. If you use the Services for prescription delivery, the pharmacy processing your prescription will provide us with your name, delivery address, email address, birth date, telephone number, the total amount (including sales tax, where applicable) being charged to you

for the prescription drug product(s) purchased, the prescription number(s) and in some case the total number of refills and your refill count (if you select to have refills fulfilled through Bouquet). The pharmacy will also share whether the prescription drug product you have ordered requires temperature control. Additionally, if a prescription drug product delivered to you through the Services has been recalled, the pharmacy will share your name, email address, the date of the prescription drug product order, and the total amount to be refunded to you with us.

Bouquet Partner Sites. Partners who have implemented certain Bouquet Services on their websites may also let us collect information about your use of their sites or applications or share such information with us.

Other third parties:

We also may collect or receive personal Information relating to you from:

Our payment processors and partners (see below);

Partners who assist us in fraud prevention or in connection with claims or disputes;

Our delivery partners;

Partners with whom we work for advertising measurement, attribution, and analytics;

Companies that offer co-branded services or products;

Law enforcement, public health, and other governmental authorities; and

Publicly available sources.

2. Payment Processors and Partners

When you subscribe using a mobile money, credit card or other payment method on Bouquet, your credit card or other payment information is collected and processed by our third-party payment processors. For example, if you subscribe with a credit card, the payment information that you provide through the Services is transmitted directly to our payment processor. We may receive limited information about your payment card from our payment processors, such as the last 4 digits of your card number and its expiration month and year.

We also make available opportunities to subscribe to Bouquet via other payment partners that may redirect you to their websites to submit your payment information. For instance, if you use PayPal or a “Buy Now Pay Later” partner to make purchases through the Services, you will be directed to their websites to provide your payment information. These payment partners’ privacy policies apply to the information you provide to them through their website.

3. Information Use

We use the Personal Information we collect or otherwise obtain about you for the following purposes:

Provide and manage the Services. We use your Personal Information in connection with the provision, administration, and management of the Services.

Process your transactions. If you place an order through the Services, we will use your Personal Information to process your payment and facilitate the delivery of your order. This may include information provided to us by our payment processors and partners.

Provide customer support. We use your Personal Information to respond to your customer support communications and inquiries and assist you in your use of the Services.

Communicate with you. We use your Personal Information to provide you with relevant information about us or our Services (including details about our community affairs efforts) or to request information or feedback. These communications include sending you from time-to-time important updates about the Services, communications about changes to this Privacy Policy or other applicable terms and policies.

Carry out our marketing and advertising activities. We (and our partners) use your Personal Information to send you marketing and promotional materials and communications, including interest-based and other advertisements, and to analyze and measure their effectiveness. Details on how to exercise your choices with respect to marketing and interest-based advertisements can be found in Your Choices and Data Rights below and Interest-Based or

Online Behavioral Advertising above.

Customize and personalize the Services. We use your Personal Information to help us understand which parts of the Services are of most interest to you and customize or personalize your experience. Based on how you browse, use, or otherwise interact with the Services, we display content, advertising, recommendations and otherwise personalize the Services to you.

Identify usage trends and improve the Services. We use your Personal Information to help us (or our service providers and partners) conduct research and analytics about your use of the Services and identify usage trends. We also use your Personal Information to identify issues, test new features or changes in our features, and improve the Services.

Maintain security and prevent fraud. We use your Personal Information to help maintain the security and integrity of the Services, (b) detect, prevent, investigate, and protect you, our business, our users, and others from fraud, unauthorized transactions, and other unsafe activity, and (c) protect the safety, rights, or property of any person, the public, or Bouquet.

Satisfy our legal obligations. We use your Personal Information to comply with applicable laws and regulations, respond to legal process, and/or respond to requests and communications from law enforcement authorities or other government officials.

Community Affairs. Bouquet is active in local communities as part of our mission to create a world where everyone has access to good health and well being. We may use your information in connection with our community affairs efforts.

As otherwise necessary or appropriate. We will use your Personal Information for other purposes at your direction or with your consent.

Please note that we may combine Personal Information that we collect (as described above) with information from other sources and use the combined information for the purposes described in this Privacy Policy.

4. Information Disclosure

We may disclose your Personal Information to the categories of recipients listed below.

Our affiliates and subsidiaries. We may disclose your Personal Information to our affiliates, subsidiaries, and other companies under common control and ownership for purposes consistent with this Privacy Policy and other business and operational purposes.

Our service providers and third-party partners. We disclose your Personal Information to third parties that provide services to us, including: cloud storage services; system hosting, services; research partners; data security services; fraud prevention; payment processing services; delivery services; analytics services; legal services; map services.

Our marketing and advertising partners. We may disclose your Personal Information to our marketing and advertising partners, including social media platforms, third-party advertising networks, and other parties to assist in serving and measuring our or their advertisements.

Our retail partners. We may disclose your Personal Information to our retail partners in order to provide and maintain the Services. For example, if available in your region, when you buy alcohol using the Services, we may be required by law to share certain information with the retailer who makes the sale. This information could include, among other things, your name and delivery address; government-issued ID information; the quantity, brand, price, proof, and volume of the alcohol purchased; and your signature. We will also disclose your Personal Information to specific retailers when you enter your loyalty card information from that retailer so that information can be added to your loyalty card account.

Other users of the Services. We may disclose your Personal Information to other users of the Services if you choose to make such information public or you select sharing features on the Services. For example, if you share a recipe publicly on the Services, the recipe, along with your first name and last initial, will be viewable by other users.

In connection with legal matters. We may share your information when we believe that the disclosure is reasonably necessary to comply with applicable laws, regulations, legal processes, or legal requests.

Third parties in connection with a sale or business transaction. We may sell or purchase assets during the normal course of business. If another entity acquires us or any of our assets, information that we have collected may be transferred to such entity and its advisors leading up to and/or following the transaction. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, information that we hold may be considered an asset of ours and may be sold or transferred to third parties.

Co-Branded Products. We offer services or sell product lines jointly with third-party businesses (such as co-branded credit cards) and we may share your Personal Information with companies that offer co-branded services or products.

Other third parties. We will disclose your Personal Information to other parties at your direction or with your consent. We may also disclose your Personal Information to other parties if we believe it necessary or appropriate either: (a) under applicable law; (b) to protect our operations and those of any of our affiliates; (c) to protect our rights, privacy, safety, or property, and/or those of others; or (d) to allow us to pursue available remedies or limit damages that we may sustain.

We may disclose your Personal Information for other reasons that we will describe at the time of information collection or prior to sharing your information.

5. Personal Health Information

Some of the information that we collect about you may relate to: (i) your past, present or future physical or mental health or condition; (ii) the provision of health care to you; or (iii) your past, present, or future payment for the provision of health care (“Personal Health Information”). This Section governs our use and disclosure of your Personal Health Information. If there is a conflict between the terms of this Section and any other terms of this Privacy Policy or the Bouquet

6. Children's Privacy

We understand the importance of protecting the privacy of children, especially in the online environment. The Services are not designed for or intentionally directed to children under the age of 16, and we do not knowingly collect Personal Information from children under the age of 16. If we become aware that we have received Personal Information from an individual under the age of 16, we will take reasonable steps to remove the individual’s Personal Information from our records.

7. Third-Party Websites

Some links on the Services may redirect you to third-party websites and services that we do not operate. We may also offer social sharing tools that let you share actions on the Services with other websites and vice versa. The privacy practices of these websites and services will be governed by their own privacy policies. We encourage you to review and understand their privacy policies before disclosing any Personal Information to them.

8. Information Security

We employ and maintain reasonable administrative, physical, and technical measures designed to safeguard and protect Personal Information under our control from unauthorized access, use, and disclosure.

In addition, when we collect, maintain, access, use, or disclose your Personal Health Information, we do so using systems and processes consistent with information privacy and security requirements under applicable federal and state laws. Nevertheless, because no data transmission or storage system is completely secure, we cannot guarantee the security of your information.

9. Cross-Border Transfers

Bouquet operates a global business, and we use vendors located around the world to help us run our business. Accordingly, the disclosures described above may result in the transfer of your Personal Information outside of the country or region in which you reside. For example, the Personal Information of customers located in Ghana will be transferred outside of Ghana, including to the United States.

When we transfer your Personal Information outside of your country of residence, we do so in accordance with applicable law and take appropriate steps to ensure your information is protected. However, please note that while outside of the jurisdiction in which you reside, some of your Personal Information will be subject to applicable local laws, which may permit government and national security authorities in those jurisdictions to access your Personal Information in certain circumstances.

10. Information Retention

We keep Personal Information only for as long as necessary to fulfill the purposes for which we have collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information; the potential risk of harm from unauthorized use or disclosure of the Personal Information; the purposes for which we use the Personal Information; whether we can achieve those purposes through other means; and the applicable laws that require us to retain information for regulatory purposes or permit us to retain the information to preserve our legal rights.

11. Your Choices and Data Rights

Depending on your place of residence, under applicable law, you may be able to, you can make certain choices and exercise certain rights with respect to our use of your Personal Information. Please note that rights and requests may be subject to applicable exceptions. We will not discriminate against you if you decide to exercise these rights:

a. Correct or update your account information and settings

If you have created an account through the Services, you may review, correct, or update your information (including your name, telephone number, delivery address, and payment information) at any time by logging in to your account and visiting the "Account Settings" page. Please note that changes to your settings may require some time to take effect.

b. Exercise your marketing choices

We may send you periodic marketing and promotional emails, push notifications and/or text messages to your mobile device, and we will obtain your consent to do so, where required by law. If you no longer wish to receive our marketing and promotional communications, you may

opt out of receiving them by following the opt-out instructions included in any communication that you receive from us or by visiting your Account Settings. Please note that even if you opt out of receiving marketing and promotional communications from us, we may still send you administrative and transactional messages from which you cannot opt out.

c. Request to Access or Delete your Personal Information

You may request that Bouquet provide you with a copy of your Personal Information or request that we delete your Personal Information. Prior to processing your requests, we must verify the identity of the requestor to help ensure that we do not for example provide your information to another person. To do so, we require you to submit up to three pieces of Personal Information that we then match against the account information we have on file for you.

Account Holders. If you have an active Bouquet account, send as a request to access or delete your Personal Information. You will be prompted to re-log in to the Services

Non-Account Holders. If you no longer have access to your Instacart Bouquet, please email us at support@bouquet.africa to submit your requests.

e. Appeals

If you submit a request to exercise any of the rights described above and we do not take action on the request, you may appeal our decision if you are in an eligible jurisdiction. To appeal our decision, please email us at support@bouquet.africa with the subject line “Rights Request Appeal.”

a. Personal Information collection and disclosure

As already described above, the following chart details the categories of Personal Information we have collected about Ghanaian residents in the past six (6) months, the sources from which we’ve collected the information, the categories of recipients to whom we have disclosed the information, and the categories of recipients to whom we have sold or with whom we have “shared” the information for cross-context behavioral advertising (“Behavioral Advertising”).

We also disclose information as explained above to law enforcement or government agencies.

Category of Personal Information

Source(s)

Categories of parties to whom we have disclosed Personal Information for a business purpose

Categories of parties with whom we have shared or to whom we have sold Personal Information for Behavioral Advertising

Identifiers, including names, email addresses, IP addresses, postal address, social media account handles and other similar identifiers.

Directly from individuals
Through automated means
Third-party sources
Our service providers
Our research partners
Our retail partners
Companies that offer co-branded goods
Our affiliates

Our third-party partners, including marketing and advertising partners

Protected classification characteristics under federal law, including age.

Directly from individuals

Our service providers
Our personal shoppers
Our affiliates
Our retail partners

Commercial information, including products purchased, obtained, or considered and other purchasing or consuming histories or tendencies.

Directly from individuals
Through automated means
Third-party sources
Our service providers
Our personal shoppers
Our retail partners
Companies that offer co-branded goods
Our affiliates
Our third-party partners, including marketing and advertising partners

Internet or other electronic network activity information, including browsing history, search history, and information regarding individuals' interactions with the Services and ads.

Through automated means

Third-party sources
Our service providers
Our affiliates

Our third-party partners, including marketing and advertising partners

Geolocation data

Through automated means

Our service providers
Our retailers
Our affiliates

Audio, electronic, visual, or similar information, such as telephone call recordings (where permitted by law).

Directly from individuals
Through automated means
Our service providers
Our affiliates

b. Sale and Sharing of Personal Information

As described above, we share your Personal Information for Behavioral Advertising and may also disclose it to certain analytics or other vendors in a manner that could be considered a “sale” under Ghana law. Please see Your Choices and Data Rights above for information on how to opt-out of such sharing or sales.

Alternatively, where available, you can use certain preference signals to exercise your sale and sharing opt-out right automatically with all businesses that you interact with online, including Bouquet. If you enable a browser-based opt-out preference signal that complies with the CCPA, such as Global Privacy Control (GPC), upon receipt or detection, we will treat the signal as a valid request to opt out of the sale or sharing of Personal Information linked to that browser and any consumer profile we have associated with that browser. Please note that if you use different browsers or browser profiles, you will have to enable the signal on each one that you use.

c. Use and disclosure of sensitive Personal Information

We only use or disclose sensitive Personal Information as necessary to provide the Services; resist malicious, deceptive, fraudulent, or illegal actions directed at our business; ensure the physical safety of natural persons; and verify, maintain, and improve the quality of our Services.

15. Changes to this Privacy Policy

We may occasionally update this Privacy Policy to reflect changes in our practices with respect to the collection, use, and disclosure of Personal Information and/or changes in applicable law.

The “Last updated” date at the top of this page indicates when this Privacy Policy was last revised. If we make changes, we will revise the date at the top of this Privacy Policy and, in the case of material changes to this Privacy Policy, we may provide you with additional notice (such as a notice posted on the Services or a message delivered to the email address that we have on file for you).

We encourage you to review this Privacy Policy periodically to remain informed about our information handling and privacy practices.

16. Contact Information

Questions or comments about this Privacy Policy or our information handling practices? Contact Bouquet Team at:

Nii Adjei Onano Street
East Legon
Accra, Ghana

info@bouquet.africa

+233 204222226.

For customer service inquiries, visit our Help Center.

If you have a disability and would like to access this Privacy Policy in an alternative format, please contact us at **+233 204222226**. Bouquet is committed to making its electronic and information technologies accessible to individuals with disabilities.

If you have comments concerning this website’s accessibility, please contact us at the email address info@bouquet.africa