



PRIVACY POLICY

Effective July 7, 2023

Meal Magic Corporation ("we", "us", or "our") offers certain products and services to K-12 school districts (the "Services") that may be accessed through our various websites (collectively, the "Sites") or our mobile applications (the "Apps", and collectively with the Sites, the "Meal Magic Corporation Properties").

We understand the importance of privacy to the schools and school districts that subscribe to our Services (the "Clients") and to the teachers, students, and parents whose information we may access on behalf of the Clients (collectively, the "Users", "you", or "your"). This privacy policy describes our practices for the collection, use, and protection of your information through the Services and Meal Magic Corporation Properties.

INFORMATION WE COLLECT DIRECTLY

School Information

We collect certain information when a Client administrator seeks to register schools for the Services or corresponds with us, such as a contact person's name, school name, school district, school email address, account name and password, phone number, and information relating to the school's information systems. Once a school begins using the Services, we will store information provided by the school and collect certain information through the school's use of the Services. We use this information to operate, maintain, and provide the

Services, to analyze and improve our Services, and to communicate with our Clients and Users.

User Information

While providing the Services to a Client, we may collect personally identifiable information about the Users, such as first and last name, gender, e-mail and mailing addresses, and payment information ("User Information"). The nature of User Information we collect depends on the Services to which a Client has subscribed, and we use such information only for the purposes of providing those Services. Such information is generally provided to us by the Clients. However, we also collect User Information directly from you when you voluntarily provide it to us, such as information that you provide by filling in forms on our Services, including information provided at the time of registering to use our Services, downloading the Apps, making payments, or requesting further services relating to the Services or your use of the Services. We also retain records and copies of your correspondence (including email addresses) if you contact us and details of transactions you carry out through our Services.

INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES

As you interact with our Services and the Meal Magic Corporation Properties, we may use automatic data collection technologies to collect

certain information about your equipment, browsing actions, and usage patterns. For example, we collect information about your device and software, such as your IP address, browser type, Internet service provider, platform type, device type, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser and mobile device or your account, and other such information. Some of this information may constitute your personal information under applicable law, even though it may not directly identify you. We use this information to improve our Services and deliver a better and more personalized service.

Data Collection Technologies

The technologies for data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Services and Meal Magic Corporation Properties. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Services or Meal Magic Corporation Properties.
- Other Technologies. Meal Magic Corporation Properties and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- Stored Information and Files. Meal Magic Corporation Properties also may access metadata and other information associated with other files stored on your device for use with the Services or Meal Magic Corporation Properties.

HOW WE SHARE YOUR INFORMATION

Except as set forth in this Privacy Policy, we do not trade, share, rent, sell, or give away your personal information to third parties. For avoidance of doubt, we do not rent or sell information for marketing purposes, and we will never share or sell User Information with third parties for marketing purposes. We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

Disclosing Personal Information

We may disclose personal information that we collect or that you provide as described in this Policy:

- to fulfill the purpose for which you provide it;
- to our subsidiaries and affiliates;
- to contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them;
- for any other purpose disclosed by us when you provide the information; or
- with your consent.

We may also disclose your personal information:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or apply our terms of Services and other agreements, including for billing and collection purposes; or
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our company, our customers, or others.

Change of Control Transaction

If we sell, divest, or transfer our business, we will not transfer User Information unless the new owner intends to maintain and provide the Services as a going concern, and provided that the new

owner has agreed to data privacy standards no less stringent than set forth in this Policy. In such case, we will provide you with notice and an opportunity to opt-out of the transfer of personally identifiable User Information.

HOW WE STORE AND PROTECT YOUR INFORMATION

We take appropriate security measures to protect against unauthorized access to, or unauthorized alteration, disclosure, or destruction of, users' information. We restrict access to your personally identifying information to employees who need to know that information to operate, develop, or improve our Services, Sites, and Apps. Our servers are protected by firewalls and are physically located in secure data facilities to further increase security. We use Secure Socket Layer (SSL) technology for mutual authentication, data encryption, and data integrity. While no computer is 100% safe from outside attacks, we believe that the steps we have taken to protect your personal information drastically reduce the likelihood of security problems to a level appropriate to the type of information involved. If you have any questions regarding measures and techniques we use, feel free to contact us. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

DATA RETENTION PERIOD

Meal Magic Corporation will retain your data for the term of service in which our Client utilizes the Meal Magic Corporation Service. Upon our Client's termination of service, Meal Magic Corporation may retain your data for up to 90 days for administrative purposes relating to the termination. After that, your data will be promptly deleted and removed from the Meal Magic

Corporation Service, unless Meal Magic Corporation has an independent legal obligation to preserve your data.

INTEGRITY

We aim to keep our information about you as accurate as possible and encourage you to promptly update your information if it changes. You may, at any time, request us to update, modify, or delete any inaccuracies in your information by contacting us at privacy@mealmagic.com. If the information is maintained by our Client (your school), you must contact the school directly to request changes.

COMPLIANCE WITH DATA PRIVACY LAWS

Family Educational Rights and Privacy Act

We shall comply in all respects with the Family Educational Rights and Privacy Act (FERPA) and all other state and federal laws applicable to the security and confidentiality of pupil records. Meal Magic Corporation will designate and train responsible individuals on ensuring the security and confidentiality of pupil records, and Meal Magic Corporation will establish and validate that security protocols that are in use at their facilities or leased facilities meet or exceed the stated and expected security surrounding FERPA which include firewalls, intrusion detection, web-based security, and authentication protocols. In addition, Meal Magic Corporation will provide such information reasonably requested by you for you to verify Meal Magic Corporation's compliance with FERPA and such other state and federal laws applicable to the security and confidentiality of pupil records.

We do not knowingly collect any personal information from children under the age of 13 unless and until our Client has obtained appropriate parental consent for the student to use the Services. If a child wants to use our Services, the child is required to obtain an account from our Client. Before an account is set up for a child, we

require our Clients to obtain from the parents consent to the collection, use, and disclosure of personal information of the child. Please contact us at privacy@mealmagic.com if you believe we have inadvertently collected personal information of a child under 13 without proper consent so that we may delete such data as soon as possible.

LINKS TO OTHER WEBSITES AND SERVICES

Please remember that this Policy applies to the Services and Meal Magic Corporation Properties only and not to other websites or third-party applications that may be linked via our Services or Meal Magic Corporation Properties, which may have their own privacy policies. You should carefully read the privacy practices of each third-party application before agreeing to engage with the application through the Services or Meal Magic Corporation Properties. We assume no responsibility or liability for the privacy practices of any vendor or operator of third-party sites or applications.

NOTICE TO CALIFORNIA RESIDENTS

The following section applies to California residents.

(a) *Shine the Light*. Under California's "Shine the Light" law, you have the right to ask us once a year if we have shared your personal information with third parties for direct marketing purposes. To make a request, please contact us as instructed in the **CONTACT INFORMATION** section and specify you are making a Shine the Light request.

(b) *California Consumer Privacy Act ("CCPA")*. The CCPA creates consumer privacy rights and requires businesses to make disclosures about their privacy policies and practices. Pursuant to the CCPA, both our privacy practices and your privacy rights are discussed in detail in the following information.

Personal Information We Collect

We collect your personal information when you interact with our Sites or otherwise communicate with us. For the purposes of this Policy, "personal information" means information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. See the last page of this document for categories of personal information collected and our business purpose for doing so.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible business purposes without providing you notice.

Sharing Your Information

We do not sell or disclose your personal information to third parties for business purposes.

Source of Personal Information

Our Policy contains more comprehensive details about the sources from which we obtain your personal information. To read this more detailed disclosure, see the section entitled "Information We Collect Directly" and "Information We Collect Through Automatic Data Collection Technologies" above.

Your Rights

The CCPA gives you certain rights regarding your personal information:

Right to Know. You may request no more than twice in a 12-month period that we provide you with copies of specific personal information we have collected, sold, or disclosed about you. However, under California law, we cannot provide you with certain sensitive information, despite your request (for example, we will not send you copies of your social security number even if it is something we collected).

Right to Delete. You may request that we delete certain personal information we have collected about you, with certain exceptions.

Exercising Your Rights

To exercise your rights above, please submit a request to us by emailing us at privacy@mealmagic.com. Please describe your request with sufficient detail so we can properly respond to your request. As part of your request, please specify which right you are exercising and be prepared to provide your username and which of our website(s) you are using. We may ask for additional information to verify your identity. The information you provide in your request and any follow-up information we ask for from you will be used solely to verify your request.

After receiving your request, we may need to contact you for further information and will notify you if your request has been granted or declined, or if an exception applies to your request.

Only you or an individual designated as your authorized agent to act on your behalf may make a request related to your personal information. You may also make a request on behalf of your minor child.

We may not discriminate against you if you choose to exercise your rights.

Responding to Your Rights Request

We will try to respond to your request within 45 days. If we need more time, we will contact you with the reason we need more time and the extension period. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. In response to your

request to know, we will only disclose the information we have collected in the 12 months prior to our receipt of your request. Our response will also explain the reasons we cannot comply with any request, if applicable.

We do not charge a fee to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate prior to completing your request.

CHANGES TO OUR PRIVACY POLICY

We may modify or update this Privacy Policy from time to time so you should review this page periodically. The changes will be effective immediately upon notice or posting, and we will update the effective date of this Policy upon such posting; provided, that if we make a material change to the policy, we will provide a reasonable advance notice to our Clients so that they have sufficient time to evaluate the change in practice. Your use or continued use of the Services or Meal Magic Corporation Properties following the effective date of any change to the Policy will be deemed to be your acceptance of the changed Policy.

CONTACT INFORMATION

If you have any questions about this policy, you may contact us via email to privacy@mealmagic.com or by mail sent to:

Meal Magic Corporation
PO Box 167
Grand Haven, Michigan 49417

We have collected the following categories of personal information covered by the CCPA from consumers within the past 12 months, and have used it for the following business purposes:

Category of Personal Information Collected	Business Purpose of Collection
<p><u>Student Information</u></p> <p><u>Demographics</u> Date of Birth Ethnicity Race Spoken Language</p> <p><u>Enrollment</u> Grade</p> <p><u>Special Indicators</u> Homeless and Foster Care Status Low-income Status</p> <p><u>Identifiers</u> App-assigned ID Number Name School District ID Number</p> <p><u>Parent / Household Information</u></p> <p>Address Email Income IP Address (used with electronic signatures) List of Other Household Members and Incomes Low-income Assistance with Case Number Name Phone Social Security Number (last four digits)</p>	<p>This information, collected when you apply for benefits or submit household income information through Meal Magic Family Portal, is used to determine if students in your household qualify for free or reduced-price meals or other special benefits. The information is stored in a database controlled by your school district.</p>
<p><u>Food Service</u> Account and Purchase History Account Balance Deposit Dates and Amounts</p>	<p>These items determine spending balances for your household members. This information is stored in a database controlled by your school district.</p>
<p><u>Parent / Household Information</u> Email Address Name</p>	<p>We collect this information when you enroll for a Meal Magic Family Portal account. It is used to identify you and give you access to information about your household’s school food service activity. This information is stored in a database controlled by your school district.</p>