Privacy Policy

Dietecture Foods & Beverages LLP

Effective Date: 17-03-2025

Last Updated: 27-07-2025

1. Introduction

SuperGrub, operated by Dietecture Foods & Beverages LLP ("we," "us," or "our"), is committed to protecting your privacy and personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you use our services, visit our website, mobile application, or engage with us through various platforms.

This Privacy Policy is drafted in compliance with the Digital Personal Data Protection Act, 2023 ("DPDP Act"), Consumer Protection Act, 2019, Information Technology Act, 2000, and Food Safety and Standards Act, 2006.

Our Contact Information:

Company Name: Dietecture Foods & Beverages LLP

Business Hours: 11:00 AM to 6:00 PM (Monday to Saturday)

Email: hello@supergrub.in

• **Phone**: 08062182340

Address: 1702, 2ND FLOOR, KUCHA JATMAL, CHANDNI CHOWK, DARIBA, KALAN, Chandni Chowk North Delhi Delhi India 110006

2. Definitions

Under the DPDP Act, 2023:

"Data Principal" means you, the individual to whom personal data relates

"Data Fiduciary" means us, SuperGrub/Dietecture Foods & Beverages LLP

"Personal Data" means any data about you that can identify you

"Processing" means any operation performed on your personal data

3. Types of Personal Data We Collect

3.1 Information You Provide Directly

- **Contact Information:** Name, email address, phone number, delivery address
- Account Information: Username, password, profile preferences
- Payment Information: Credit/debit card details, UPI information, bank account details
- Order Information: Purchase history, dietary preferences, special instructions
- Communication Data: Customer service interactions, feedback, reviews, complaints

3.2 Information We Collect Automatically

- **Device Information:** IP address, browser type, device identifiers, operating system
- Usage Data: Pages visited, time spent, click patterns, search queries
- **Location Data:** Delivery location, GPS coordinates (with consent)
- Cookies and Tracking: Website usage patterns, preferences, session data

3.3 Information from Third Parties

- Delivery Partners: Order status, delivery confirmation, feedback
- Payment Processors: Transaction verification, fraud prevention data
- **Social Media:** Profile information when you connect social accounts
- **Business Partners:** Retail partner data, aggregator platform information

4. Legal Basis for Processing Personal Data

We process your personal data based on:

4.1 Your Consent

• Marketing communications and promotions

- Loyalty program participation
- Non-essential cookies and analytics
- Location tracking for delivery optimization

4.2 Legitimate Business Purposes

- Order processing and fulfillment
- Customer service and support
- Payment processing and fraud prevention
- Business operations and analytics
- Compliance with FSSAI and food safety regulations

4.3 Legal Obligations

- Tax compliance and GST requirements
- FSSAI licensing and food safety compliance
- Consumer protection law requirements
- Court orders and legal proceedings

5. How We Use Your Personal Data

5.1 Primary Purposes

- Order Processing: Processing, packaging, and delivering your food orders
- **Account Management:** Creating and maintaining your customer account
- **Payment Processing:** Facilitating payments and managing transactions
- **Customer Service:** Responding to inquiries, complaints, and support requests
- **Quality Assurance:** Ensuring food safety and quality standards

5.2 Marketing and Communication

Promotional Communications: Sending offers, discounts, and product updates

- Loyalty Programs: Managing rewards, points, and subscription services
- Market Research: Understanding customer preferences and improving services
- **Personalization:** Customizing your experience based on preferences

5.3 Business Operations

- **Analytics:** Analyzing usage patterns and business performance
- **Risk Management:** Fraud prevention, security monitoring
- Supply Chain: Inventory management, demand forecasting
- **Compliance:** Meeting regulatory and legal requirements

6. Data Sharing and Disclosure

6.1 Third-Party Service Providers

We share your data with:

- **Delivery Partners:** For order fulfillment and delivery services
- **Payment Processors:** For secure payment processing
- Technology Providers: For website/app hosting, analytics, and maintenance
- **Customer Service:** For outsourced support services
- Marketing Agencies: For advertising and promotional campaigns

6.2 Business Partners

- **Retail Partners:** When you purchase through partner stores or any general trade or modern trade outlets
- Aggregator Platforms: Swiggy, Zomato, and other delivery and Quick Commerce platforms
- Loyalty Program Partners: For reward redemption and benefits

6.3 Legal Disclosures

We may disclose your data to:

- Government authorities when legally required
- Law enforcement agencies for investigation purposes
- FSSAI and food safety regulators
- Courts and legal proceedings
- Tax authorities for compliance

6.4 Business Transfers

In case of merger, acquisition, or sale of business assets, your data may be transferred to the new entity with appropriate safeguards.

7. Data Security Measures

7.1 Technical Safeguards

- **Encryption:** All sensitive data is encrypted in transit and at rest
- Access Controls: Role-based access to personal data
- **Security Monitoring:** 24/7 monitoring for unauthorized access
- **Data Backup:** Regular backups with secure recovery procedures
- **Network Security:** Firewalls, intrusion detection systems

7.2 Organizational Measures

- Staff Training: Regular privacy and security training for employees
- Access Logs: Monitoring and logging all data access
- **Data Minimization:** Collecting only necessary data for specific purposes
- **Vendor Agreements:** Ensuring third parties comply with security standards
- **Incident Response:** Procedures for handling data breaches

8. Data Retention

8.1 Retention Periods

- Account Data: Retained until account deletion or 7 years after last activity
- **Order History:** Retained for 7 years for tax and legal compliance
- **Payment Data:** Tokenized data retained for 10 years as per financial regulations
- Marketing Data: Retained until consent withdrawal or 3 years of inactivity
- **Legal Data:** Retained as required by applicable laws

8.2 Data Deletion

We will delete your personal data:

- When the purpose for collection is fulfilled
- Upon withdrawal of consent (where consent is the legal basis)
- When legally required to do so
- After the retention period expires

9. Your Rights Under DPDP Act, 2023

9.1 Right to Access

You can request information about:

- What personal data we process about you
- Purposes of processing
- Categories of recipients we share data with
- Retention periods

9.2 Right to Correction

You can request us to:

- Correct inaccurate personal data
- Update incomplete information

Complete missing data

9.3 Right to Erasure

You can request deletion of your personal data when:

- It's no longer necessary for the original purpose
- You withdraw consent
- Data has been unlawfully processed

9.4 Right to Grievance Redressal

- Contact our Data Protection Officer
- File complaints through our grievance mechanism
- Approach the Data Protection Board of India if unsatisfied

9.5 Right to Nominate

You can nominate someone to exercise your rights in case of:

- Death
- Mental incapacity
- Physical incapacity

10. Children's Privacy

10.1 Age Restrictions

- Our services are not intended for children under 18 years
- We do not knowingly collect data from children without parental consent
- If you're under 18, please have your parent/guardian use our services

10.2 Parental Consent

If we need to process a child's data:

- We obtain verifiable parental consent
- We limit data collection to what's necessary
- We do not engage in behavioral tracking or targeted advertising of children
- Parents can review, modify, or delete their child's data

11. Consent Management

11.1 Providing Consent

- Consent must be free, specific, informed, and unconditional
- You can provide consent through various mechanisms on our platform
- We maintain records of all consent given

11.2 Withdrawing Consent

- You can withdraw consent at any time
- Withdrawal is as easy as giving consent
- We will stop processing data upon consent withdrawal
- Some services may become unavailable after consent withdrawal

11.3 Consent for Marketing

- We seek separate consent for marketing communications
- You can opt-out of marketing at any time
- Opting out doesn't affect your ability to use our services

12. Cross-Border Data Transfers

12.1 International Transfers

- We may transfer data outside India to provide services
- All transfers comply with DPDP Act requirements

• We ensure adequate protection through appropriate safeguards

12.2 Restricted Countries

- We do not transfer data to countries notified as restricted by the Government of India
- All transfers are subject to government approval where required

13. Cookies and Tracking Technologies

13.1 Types of Cookies

- **Essential Cookies:** Necessary for website functionality
- Analytics Cookies: Help us understand website usage
- Marketing Cookies: Used for advertising and personalization
- Third-Party Cookies: From our partners and service providers

13.2 Cookie Management

- You can control cookies through browser settings
- Disabling cookies may affect website functionality
- We provide cookie preference center for granular control

14. Data Breach Notification

14.1 Our Obligations

- We will notify the Data Protection Board of any breach promptly
- We will inform affected individuals without undue delay
- We will provide details about the breach and mitigation measures

14.2 Breach Response

Immediate containment and assessment of the breach

- Investigation to understand the cause and impact
- Implementation of measures to prevent future breaches
- Regular monitoring and review of security measures

15. Grievance Redressal Mechanism

15.1 Contact Information

Data Protection Officer:

• Name: Sarthak Sharma

• Email: <u>hello@supergrub.in</u>

• **Phone:** 08062182340

15.2 Complaint Process

1. **Internal Grievance:** Contact our DPO or customer service

2. **Response Time:** We will respond within 30 days

3. **Escalation:** If unsatisfied, approach the Data Protection Board of India

4. **Board Contact:** https://www.dataprotection.gov.in (when operational)

16. Updates to Privacy Policy

16.1 Policy Changes

- We may update this policy to reflect legal or business changes
- Material changes will be notified through email or website notice
- Continued use after changes constitutes acceptance
- You can review the "Last Updated" date at the top of this policy

16.2 Notification Methods

- Email notifications to registered users
- Website banners and notifications
- App push notifications (if applicable)
- SMS notifications for significant changes

17. Compliance and Certifications

17.1 Regulatory Compliance

- **DPDP Act, 2023:** Full compliance with data protection requirements
- FSSAI Regulations: Food safety and labeling compliance
- Consumer Protection Act, 2019: E-commerce and consumer rights compliance
- IT Act, 2000: Information technology and cybersecurity compliance

17.2 Industry Standards

- Implementation of industry-standard security practices
- Regular security assessments and audits
- Compliance with payment industry security standards
- Adherence to food industry quality standards

18. Contact Us

For any questions, concerns, or requests regarding this Privacy Policy or your personal data, please contact us:

SuperGrub - Dietecture Foods & Beverages LLP

• Email: hello@supergrub.com

• Customer Service: hello@supergrub.com

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- **Website:** supergrub.in

Note: This Privacy Policy is governed by Indian law. Any disputes arising from this policy shall be subject to the jurisdiction of courts in [Insert City], India.

Language: This Privacy Policy is available in English and [other Indian languages as required]. In case of any discrepancy, the English version shall prevail.