

# Privacy Policy & Mobile Messaging Disclosure

**Effective Date:** July 17, 2025

**Applies To:** Express cuts unlimited inc. (DBA Tangier Bar and Pizza), its owned and operated restaurant brands (collectively, “Company,” “we,” “us,” or “our”), and the websites, mobile sites, online ordering pages, point-of-sale systems, loyalty / rewards programs, and SMS/MMS (“text”) messaging programs that link to or reference this Privacy Policy (together, the “Services”).

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## Quick Reference (At-a-Glance)

- **We collect:** contact info (e.g., mobile number, email), order & loyalty data, device/usage data.
- **We use data:** to send you the texts, offers, and services you request; fulfill orders; improve operations; secure our systems; and comply with law.
- **Text Marketing:** Recurring autodialed marketing messages when you opt in. Message frequency varies. Message & data rates may apply. Reply **STOP** to cancel, **HELP** for help.
- **We don’t sell or share mobile originator opt-in data for marketing.** See the Mobile Messaging Addendum below for the exact required language.
- **Your Rights:** Depending on where you live (e.g., CA, CO, CT, VA, UT and others), you may have rights to access, delete, correct, or opt out of certain data uses. See State Privacy Rights.
- **Contact Us:** (234) 855-0847 | 880 Youngstown-Poland Rd, Struthers, OH 44471

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### 1. Scope

This Privacy Policy describes how we collect, use, disclose, and protect information in connection with the Services. It covers both **online** (websites, ordering pages, mobile forms, Wi-Fi splash pages, loyalty portals, digital ads, and social accounts) and **offline** (in-store order slips, printed call-to-action signage, guest checks, and customer service interactions) collection methods that link to or reference this Policy.

This Policy does **not** cover third-party websites or services that do not link here, even if accessed via our Services. Please review their policies before providing data.

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## 2. Types of Information We Collect

### Identifiers & Contact Information

- Mobile phone numbers
- Email address
- Name (first, last)
- Birthday (if applicable)
- Postal address or ZIP/postal code
- Loyalty, rewards, or customer ID numbers

### Commercial & Transaction Information

- Order history (items purchased, location, date/time, amount)
- Offers redeemed, coupons used
- Loyalty program balances & redemptions

### Internet / Device / Technical Data

- IP address, device identifiers, browser type, operating system
- Referring/exit pages, clicks, pages viewed, session timestamps
- Cookie, pixel, or similar tracking data (see below)

### Geolocation Data (imprecise)

- Derived from IP, order pickup/delivery address, or store location used.

### Audio / Visual / In-Store Systems (if applicable)

- Security camera footage (on-premises)
- Recorded customer service calls (where permitted by law with notice)

### Inferences

- Purchase tendencies, menu preferences, likely store location, promotional segments.

We may collect **sensitive personal information** (e.g., precise geolocation, payment card data) only as necessary to provide requested services; sensitive data receives additional protections. Payment card data is processed by PCI-compliant processors; we do not store full card numbers.

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### 3. How We Collect Information

We collect information in several ways:

**Directly from You** – When you place an order; sign up for texts by keyword, web form, kiosk, tablet, QR code, or reply to a one-time invitation; join loyalty; enter a contest; contact customer support; or otherwise provide information.

**Automatically** – When you visit our sites or apps we (and service providers) may use cookies, pixels, SDKs, local storage, or similar tools to collect device and usage data.

**From Transactions** – POS and online ordering systems generate order records that link to your customer ID or mobile number when known.

**From Service Providers & Partners** – Delivery platforms, reservation systems, marketing and analytics vendors, payment processors, or franchise operators who support our Services may share information with us as permitted by their agreements with you and/or us.

**From Public & Commercial Sources** – Where allowed by law, we may append demographic or interest data to better tailor offers.

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### 4. How We Use Information

We use information for the following business and (where allowed) commercial purposes:

1. **Provide the Services** – Process and deliver orders; manage accounts, loyalty, and rewards; send service and transactional messages (order confirmations, pickup/delivery updates).
2. **Operate Mobile Messaging Programs** – Send marketing, promotional, and loyalty texts to users who have opted in; send one-time post-purchase invitations where permitted; manage opt-ins/opt-outs; respond to HELP requests.
3. **Personalize Offers & Content** – Recommend menu items, tailor discounts, segment audiences, and measure campaign performance.
4. **Customer Support** – Respond to questions, troubleshoot issues, and process requests relating to privacy rights or messaging preferences.
5. **Analytics & Improvement** – Understand usage, improve menus and promotions, optimize store operations, and enhance site/app performance.
6. **Security & Fraud Prevention** – Detect and prevent fraud, abuse, spam, or unauthorized system access; protect our customers and business.
7. **Legal & Compliance** – Maintain records of consent (opt-ins/opt-outs), honor Do-Not-Send requests, comply with carrier rules, tax, accounting, food safety, and other legal obligations, and enforce our Terms.

We may aggregate or de-identify data so it can no longer reasonably identify you; we may use and disclose such data for any purpose permitted by law.

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## 5. Our Mobile Messaging (SMS/MMS) Programs

Our restaurants and brands operate one or more recurring SMS/MMS programs for offers, promotions, and rewards (the “Mobile Program”). Participation is optional.

### 5.1 How to Opt In

You can join by:

- **Keyword Text Opt-In:** Text the advertised keyword (e.g., PIZZA) to the displayed number/short code.
- **Web / Digital Opt-In:** Submit a form or check a consent box that clearly states you agree to receive recurring marketing texts.
- **One-Time Post-Purchase Invitation:** After you place an order (in-store or online), we may send you a single text within 90 days inviting you to join. You are not enrolled unless you affirmatively respond (e.g., text JOIN or reply with the keyword).

All opt-in prompts state that message frequency varies, that message & data rates may apply, and that you can reply STOP to cancel.

### 5.2 Confirmation Message

After you opt in, you will receive a confirmation text:

“Welcome to Tangier Texts! Recurring msgs. Msg&Data rates may apply. Reply STOP to cancel, HELP for help. T&C/Privacy: <https://www.tangierpizza.com/privacy>.”

### 5.3 Message Types You May Receive

- Exclusive coupons & limited-time offers
- Loyalty & rewards updates
- Event or promotional announcements
- Birthday/anniversary offers (if provided)
- Occasional service notices about your participation in the Mobile Program

### 5.4 Opt-Out Instructions

Reply **STOP** at any time to any message to cancel. You will receive a final confirmation (“You are unsubscribed and will no longer receive msgs.”). No further marketing messages will be sent unless you re-opt in. You may also opt out by contacting us using the methods in Contact Us;

we will process reasonable opt-out requests submitted through other channels consistent with law.

5.5 HELP / Support

Reply **HELP** for help. You may also reach us at (234) 855-0847.

5.6 Eligibility & Age

The Mobile Program is intended for U.S. residents 18+ (or age of majority in your state). Minors should obtain a parent or guardian’s permission before enrolling.

5.7 Program Availability & Carrier Disclaimer

Carriers are not liable for delayed or undelivered messages. Message frequency varies by participation level and promotions.

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6. Sharing & Disclosure of Information

We disclose information as follows:

Recipient Category	Why Information is Shared	Examples
Service Providers (Processors)	To operate the Services under contract	Messaging platforms, POS/ordering vendors, payment processors, analytics providers, cloud hosting
Restaurant Franchisees / Corporate Affiliates	To fulfill orders and honor loyalty across participating locations	Store operators who prepare your order
Marketing & Advertising Partners	To deliver or measure campaigns <i>only where allowed by your choices</i>	Email service providers, digital ad networks (hashed data)
Law Enforcement & Legal	To respond to lawful requests, enforce terms, or protect rights, safety, or property	Subpoenas, fraud investigations
Business Transfers	In connection with mergers, acquisitions, financing, or sale of assets	Due diligence data rooms

**We do not sell or share mobile originator opt-in data (phone numbers, consent records, text messaging originator opt-in data and consent) with third parties or affiliates for their marketing or promotional purposes.** See the Mobile Messaging Addendum for the exact carrier-required wording.

If we must disclose mobile numbers to a service provider to send texts on our behalf, those providers are contractually prohibited from using the numbers for their own marketing.

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## 7. Retention of Information

We retain personal information for as long as needed to:

- Provide requested Services (active accounts, loyalty membership, open orders);
- Maintain legally required records of consent, opt-in/opt-out status, and transactional history (often 4+ years recommended for TCPA defense; longer where required by state recordkeeping, tax, or food safety laws);
- Resolve disputes, enforce agreements, and protect against fraud.

We use documented criteria (account status, customer activity, legal holds) to determine retention periods. When data is no longer needed, we delete, de-identify, or archive it in accordance with law and our retention schedule.

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## 8. Your Choices & Controls

You have several controls over how we use your information:

**Text Messaging Opt-Out** – Reply STOP to any marketing text to cancel. See 5.4 Opt-Out Instructions.

**Email Marketing Opt-Out** – Use the unsubscribe link in promotional emails.

**Cookie Controls** – Manage browser cookies through your browser settings; use industry opt-out tools (e.g., NAI, DAA) for interest-based ads.

**Account / Loyalty Preferences** – Update contact info, birthday/anniversary data, or communication preferences in your account profile (where available) or by contacting customer support.

**Privacy Rights Requests** – See State Privacy Rights for jurisdiction-specific rights and submission methods.

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## 9. State Privacy Rights

State privacy laws give residents of certain U.S. states specific rights regarding personal information. Depending on your residency and subject to exceptions, you may have the right to:

- **Access / Know** – Request the categories and specific pieces of personal information we have collected about you.
- **Correct** – Request that we correct inaccurate personal information.
- **Delete** – Request we delete personal information we collected from you.
- **Opt Out of Sales / Targeted Advertising / Sharing** – Direct us not to sell or share your personal information for cross-context behavioral advertising (we do not sell mobile messaging opt-in data; see above).
- **Limit Use of Sensitive Personal Information** – Where applicable (e.g., CA), direct us to restrict uses of sensitive data to permitted purposes.

### How to Submit a Request

Submit a request by:

- Phone: (234) 855-0847
- Letter: 880 Youngstown-Poland Rd, Struthers, OH 44471

Please provide your name, the phone number and/or email associated with your account or text enrollment, your request type, and the state in which you reside. We will take reasonable steps to verify your identity before fulfilling a request (matching at least two data points; more for sensitive data).

You may authorize an agent to submit a request on your behalf; we may require proof of authorization and verification of your identity.

We will confirm receipt within 10 business days (CA requirement) and respond within the time period required by applicable law (e.g., 45 days in CA, extendable once where reasonably necessary).

We will not discriminate against you for exercising your privacy rights.

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## 10. Children's Privacy

Our Services are not directed to children under 13, and we do not knowingly collect personal information from children under 13 without verifiable parental consent. If we learn we have



collected such information, we will delete it. Parents who believe their child has provided us information may contact us at (234) 855-0847.

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## 11. Security

We implement administrative, technical, and physical safeguards designed to protect personal information against unauthorized access, loss, misuse, or alteration. Examples include access controls, encryption in transit where supported by carriers/platforms, secure credential management, least-privilege access, employee training, and vendor due diligence. No system can guarantee 100% security; please use caution when transmitting information.

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## 12. International Transfers

Our systems and service providers may be located in the United States and other jurisdictions. By using the Services, you understand that your information may be transferred to, stored in, and processed in the United States or other countries that may not provide the same level of data protection as your home jurisdiction. We take steps to apply appropriate protections consistent with this Policy and applicable law.

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## 13. Changes to This Policy

We may update this Policy from time to time to reflect changes in technology, law, or our practices. When we do, we will revise the "Effective Date" above and, where required by law, notify you (e.g., by posting a notice on our site, sending an email, or sending a text). Your continued use of the Services after the Effective Date constitutes acceptance of the updated Policy.

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## 14. Contact Us

### Privacy Questions or Requests

Phone: (234) 855-0847

Mail: Tangier Bar & Pizza, 880 Youngstown-Poland Rd, Struthers, OH 44471

### SMS Support

Reply HELP at any time or call (234) 855-0847.

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## 15. Mobile Messaging Addendum (Full Legal Language)

### Mobile Messaging Terms & Privacy Disclosure

By opting in to any Tangier Bar & Pizza text message program, you expressly consent to receive recurring marketing and informational text messages (SMS/MMS) from Express cuts unlimited inc., including text messages that may be sent using an automatic telephone dialing system, to the mobile telephone number you provided. Consent to receive marketing text messages is not a condition of any purchase. Message frequency varies. Message & data rates may apply. Reply HELP for help, STOP to cancel.

**No mobile information will be shared with third parties/affiliates for marketing/promotional purposes.** *All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.*

If you opt in via text keyword, web form, or by responding to an invitation, we will confirm your enrollment with a welcome message. You may revoke your consent at any time by replying STOP to any message you receive from us. You may also revoke consent or request additional assistance by contacting us at (234) 855-0847.

We may use information we obtain in connection with the Mobile Program (including your mobile number, opt-in/opt-out status, message activity, and transactional data tied to your number) to operate the Program; send you offers; measure campaign performance; prevent spam or abuse; and comply with law and carrier requirements. For additional details about how we collect, use, and protect information, see the main sections of this Privacy Policy above.

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