



Guest Data Policy

Dear guest,

You will find our data policy below.

Best regards from
Sovino Brands

Which data

Booking data

Any way you make your booking at a Sovino Brands restaurant (online, by phone, personal attendance, e-mail, SoMe, text message, MMS), your booking data are stored in the SevenRooms booking system (in the following just named the booking system). SevenRooms is a data handler for Sovino Brands.

Mandatory booking data:

- Name
- E-mail
- Phone number
- Booking history

Optional booking data:

- Birthday
- Special occasions
- Dietary restrictions

Profile notes

Do you wish for a personalized visiting experience? Then check the optional box 'Profile notes' when you book.

When checking this box, you allow the staff to add notes to your profile in the booking system and store these along with your booking data. Notes enable the staff to optimize and personalize your visit, when possible.

Notes may include:

- Beverage preferences
- Menu preferences
- Seating preferences
- Job position
- Special relations

App data

If you use the Sovino Brands app, the following data are registered:

Mandatory app data:

- Name
- E-mail
- Phone number
- Booking history
- Transaction history
- Language settings

Newsletter data

If you choose to subscribe to our newsletters, the following data are registered:

- Name
- E-mail

Cookie data

When you visit a Sovino Brands website and accept cookies, some cookie data are registered.

Click the refresh wheel at the left in the bottom of the website to

learn more.

Additional data

If you correspond with us by e-mail, SMS, MMS or SoMe, or if you leave a business card etc., we may receive other data than the above.

Such data may include:

- Home address
- Workplace (company name)
- Job title
- Allergies / disabilities / illness
- Credit card info
- Bank info
- SoMe profile ID
- Media profile portrait
- Other photos

Behavioral tags

In case of behavioral issues at any Sovino Brands restaurant related

to a guest, Sovino Brands may add behavioral tags to the guest's booking profile. Such will apply throughout all the Sovino Brands restaurants.

Behavioral tags may include:

- Attitude
- Aggression
- Drug related incidents
- Crime related info
- Payment issues
- Non-compliance with our policies or staff instructions

This is not a complete list.

Video

All the Sovino Brands restaurants have video surveillance. All inside and outside areas, except restrooms, may be monitored by stationary cameras.

Our video surveillance is for the safety of our guests, staff and property, preventing and documenting criminal acts and establishing legal claims.



Guest Data Policy

Surveillance videos will only be disclosed upon specific request from law enforcement authorities when this is required in connection with an investigation.

Media

Depending on the circumstances and your own choice of communication, web interaction, use of our app, subscription to newsletters etc., your data may be sent/generated by and occur on these media:

- The booking system
- Text messages (SMS)
- Multimedia messages (MMS)
- Microsoft Office documents
- Adobe Reader documents
- The restaurant's e-mail accounts
- The restaurant's computer hard drive
- The restaurant staff's work computer hard drive
- The Sovino Brands administration mail accounts
- The Sovino Brands administration servers
- The Sovino Brands administration finance system (Navision)
- Video surveillance server
- External backup servers
- External cloud service
- External data handlers' platforms
- The Sovino Brands app data storage
- Our newsletter data storage

- Our webserver
- Facebook
- Messenger
- Instagram
- Printed papers

Access

Your data can be accessed and purposefully used by:

- Relevant staff of the restaurant
- The Sovino Brands administration team

and to a relevant extend also Sovino Brands':

- Auditor
- Lawyer
- Bank
- Insurance
- Transaction providers
- IT support
- Relevant data handlers & data hosts

Booking data in the booking system can also be accessed by:

- The other Sovino Brands restaurant's staff
- The booking system's team

Your data are only passed on to third-parties to the necessary

extent to:

- Run and secure our business responsibly
- Fulfill our obligations towards
- Comply with legislation

Data can only be submitted to the authorities upon relevant legal basis. If so, we will simultaneously inform you.

Some interaction will always be subject to the policies of the media in question, which you have accepted when joining that media. Such policies are an addition to our policies.

How long

Data are stored for the following periods:

Booking data In the booking system	12 months after your latest visit at any <u>Sovino Brands</u> restaurant
Profile notes in In the booking system	12 months after your latest visit at any <u>Sovino Brands</u> restaurant
App data	Auto deleted 30 days after you erase your app profile in app's settings.
Newsletter data	Auto deleted 30 days after you have unsubscribed.
Cookie data	Deleted when you erase the cookies from your browser
Behavioral tags	12 months after the tag was added

Any data communicated outside and/or purposefully used outside the booking system

Up to 3 calendar years in the restaurant, and up to 5 calendar years in the administration

Normal contact info

May sometimes be stored for unspecified time, eg. if you are a regular guest

Video surveillance

Auto deleted after 30 days

Downloaded video footage

Up to 5 calendar years, for investigation or legal purposes, depending on the circumstances

Source

As a main rule, the data come from:

Booking data	>	You
Additional data	>	You
Profile notes	>	the <u>Sovino Brands</u> restaurant's staff
App data	>	You
Newsletter data	>	You
Cookie data	>	Your web browser
Behavioral tags	>	The <u>Sovino Brands</u> restaurant's staff
Normal Contact info	>	You / others / published info
Video	>	The restaurant's video surveillance system

Use

Depending on the circumstances and your own choices regarding communication, interaction, subscription etc., your data may in a relevant manner be used for:

- Identification related to your visit
- Booking confirmation
- Communication regarding your visit
- Handling and optimizing your visit
- Accommodating needs and requests
- Settling payments
- Visit feedback
- Bookkeeping & accounting
- Statistics (anonymized)
- Sending you news and information
- Optimizing website functionality and user experience

More rarely, data may be used to handle and investigate:

- Complaints
- Liabilities
- Disputes
- Criminal acts

Your data are never used for irrelevant purposes, of course.

Protection

Your data are protected by technical and organizational measures and are stored securely.

Our devices are protected with a login and relevant IT security measures.

Printed papers and devices are kept out of reach of irrelevant persons. Outside opening hours and office hours both are protected by cabinet lock or door lock.

Our staff is aware of their duty of confidentiality, of treating your data with responsibility and their obligation not to use your data for irrelevant purposes.

Third party data handlers and receivers are committed to confidentiality and relevant protection measures.

We use some data handlers and data hosts outside the EU. This is performed with appropriate security measures meeting the demands of the [GDPR](#).

Legal authority

Your data are stored according to the following legislation.

Mandatory booking data	GDPR <u>art. 6.1.b</u>	Contract with the data subject
	GDPR <u>art. 6.1.f</u>	Legitimate interests of the controller
Optional booking data	GDPR <u>art. 6.1.a</u>	Given consent from the data subject
	GDPR <u>art. 9.2.a</u>	Given consent from the data subject
	GDPR <u>art. 9.2.c</u>	Vital interests of the data subject
Profile notes in booking system	GDPR <u>art. 6.1.a</u>	Given consent from the data subject
App data	GDPR <u>art. 6.1.a</u>	Given consent from the data subject

Newsletter data	GDPR <u>art. 6.1.a</u>	Given consent from the data subject
Cookie data	GDPR <u>art. 6.1.a</u>	Given consent from the data subject
Behavioral tags	GDPR <u>art. 6.1.f</u>	Legitimate interests of the controller
Additional data; general	GDPR <u>art. 6.1.b</u>	Contract with the data subject
	GDPR <u>art. 6.1.c</u>	Legal obligations regarding bookkeeping etc.
	GDPR <u>art. 6.1.f</u>	Legitimate interests of the controller
Additional data; allergies / disabilities / illness	GDPR <u>art. 9.2.c</u>	Vital interests of the data subject
	GDPR <u>art. 9.2.f</u>	Establishment, exercise or defense of legal claims

Video surveillance	GDPR <u>art. 6.1.c</u>	Legal obligations regarding video surveillance
	GDPR <u>art. 6.1.f</u>	Legitimate interests of the controller
	GDPR <u>art. 9.2.f</u>	Establishment, exercise or defense of legal claims
Downloaded video footage	GDPR <u>art. 6.1.f</u>	Legitimate interests of the controller
	GDPR <u>art. 9.2.f</u>	Establishment, exercise or defense of legal claims

Right to be forgotten

If you want a data deletion; an early deletion (before the dates above under *How long*); or a minimization your data, the following applies:

Mandatory
Booking data in the
booking system

Mail your request to support@sovino.dk.
We will delete the data, unless we have a need & legal authority or an obligation to store them for our normal period. If so, we will inform you.

Optional booking
data in the
booking system

Mail your request to support@sovino.dk.
We will then delete the data.

Profile notes in
the booking system

Mail your request to support@sovino.dk.
We will then delete the data.

App data

Erase your app profile in the app's settings

Newsletter
data

Use the 'Unsubscribe' function
in bottom of the newsletter.

Cookie
data

Erase cookies from your browser and/or set your browser to reject cookies.

Behavioral
tags in
the booking
system

Such can be stored without consent. Inquiries or complaints hereof may be sent to support@sovino.dk. We will then evaluate our need & the legal authority to store the tags, and then inform you.

Any data commu-
nicated and/or
purposefully used
outside the
booking system

Mail your request to support@sovino.dk. We will delete the data, unless we have a need & legal authority or an obligation to store them for our normal period. If so, we will inform you.

Normal
contact
info

Mail your request to support@sovino.dk. We will delete the data, unless we have a need & legal authority or an obligation to store them for our normal period. If so, we will inform you.

Video
surveillance

Due to technical challenges of omitting specific guests from recordings, a wish to be forgotten before the automatic deletion does not exceed our legitimate interests etc. in the opposite. Hence, early deletion will not occur.

Requests regarding incidents during your visit may be filed to support@sovino.dk, stating place, time and other info relevant to identify the incident. We will then investigate and to a relevant and possible extend secure the recordings. As a main rule, recordings will only be disclosed to the police and only upon their request.

Downloaded
video footage

If you wish to know if you occur in specific video footage downloaded and stored beyond our automatic date of deletion, an inquiry can be filed to support@sovino.dk, stating place, time and other info relevant to identify the incident. We will then investigate. If we have a need & legal authority or an obligation to further store the footage, we will inform you about it. Otherwise, we will delete it.

Want to know more

If you wish to know which data we have stored about you, if you become aware of incorrect data, or if you have other inquiries/complaints regarding our data handling, feel free to contact our data controller:

Jon Rex Laugen

+45 2689 2789

jon@sovino.dk

If you are unsatisfied with our data handling and wish to complain to the authorities, the relevant Danish authority is Datatilsynet.