

Dear business partner,

You will find our data policy below.

(Click [here](#) for the latest version.)

Best regards from
Sovino Brands

Which data

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.

Other data

When you correspond with us, eg. through e-mail, letter, SMS, MMS, SoMe or a Sovino Brands website, we receive data about you.

Such data may include:

- Name
- E-mail
- Phone number
- Workplace (company name and address)
- Job title
- SoMe profile ID
- Profile portrait

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.

Surveillance videos will only be disclosed upon specific request from law enforcement authorities for specific investigation purposes.

Media

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

- 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 e-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
- Our newsletter data storage
- Our webserver
- SoMe (Facebook & Instagram)
- Messenger
- 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

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

- Run and secure our business responsibly
- Fulfill our obligations towards your business
- 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:

Newsletter data	Auto deleted 30 days after you have unsubscribed.
Cookie data	Deleted when you erase the cookies from your browser
Normal contact info	May sometimes be stored for unspecified time, eg. if you are a regular or lasting business partner
Video surveillance	Auto deleted after 30 days
Downloaded video footage	Up to 5 calendar years, for investigation or legal purposes, depending on the circumstances
Other data	In the restaurants: Up to 3 calendar years In the administration: Up to 5* calendar years after the

business relationship with your
business has ceased.

(*unless if subject to expanded
audit duty, then up to 10 calendar
years)

Source

As a main rule, the data come from:

Newsletter data	>	You
Cookie data	>	Your web browser
Normal contact info	>	You / others / published info
Video	>	The restaurant's video surveillance system
Other data	>	You / your business / your own colleagues

Use

Depending on circumstances and choice of communication / interaction, data may in relevant ways be used for:

- Fulfill our obligations towards your business
- Pursue our legitimate interests
- Run and secure our business responsibly
- Comply with legislation
- Communication related to our business cooperation
- Handling and optimizing your visit
- Settling payments
- 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.

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
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
art. 6.1.f

Legitimate interests
of the controller

GDPR
art. 9.2.f

Establishment,
exercise or defense
of legal claims

Other
data

GDPR
art. 6.1.b

Contract with
the data subject's
business

GDPR
art. 6.1.c

Legal obligations
regarding
bookkeeping etc.

GDPR
art. 6.1.f

Legitimate interests
of the controller

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:

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.
Normal contact info	E-mail a 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 persons 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.

Other
data

E-mail a 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.

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 at:

jon@sovino.dk
+45 2689 2789

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