

We are Sornero Investments Ltd and we are committed to protecting your privacy. In this privacy policy, we set out how we collect your personal data, how we use it, and what rights and choices you have in relation to the personal data we hold and process.

What personal data might we collect?

We collect different types of personal data for different reasons – this may include:

- **Contact information:** Information such as your name, telephone number, mobile number and email address.
- **Enquiries:** information from your online reservation, enquiries, requests or complaints, any attachments or documents you may send us or any other information you may choose to provide
- **Preferences:** Information about your preferences or any allergy information, where it is relevant to the services we provide.
- **CCTV:** We also collect footage from our CCTV cameras for security and monitoring purposes which are located at the entrance, exits or other areas. For this purpose, we have placed signs inside and outside of our premises indicating such use of CCTV cameras.

When do we collect your personal data?

We may collect personal data about you in various cases, such as for example:

- When you or your organisation make an enquiry through our website, social media channels, in person, over email or over the telephone;
- Data that you provide when making a enquiry, online reservation or a complain;
- Data that you provide when asking to perform an event or banquet at our premises, including but not limited to, a guest list;
- When you attend any events we may organise;
- When you sign up to receive newsletters and other marketing and promotional materials;
- When you reach out to us, we may keep a record of the correspondence (in any form);

How will we use your personal data?

We will use your personal data for the following purposes (*Permitted Purposes*):

- To provide you with our services, as instructed or requested by you or your organisation;
- To deal with your enquiries, complaints, reservations or requests;
- For compliance with our legal obligations (such as record keeping obligations);
- To analyse and improve our services and communications to you;
- To protect the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and to detect security threats, fraud or other criminal or malicious activities;
- To monitor and assess compliance with our policies and standards;

- On instruction or request from you;
- To comply with court orders and exercises and/or defend our legal rights; and
- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us.

With regard to the following marketing activities, we will only carry on such processing where we are permitted to do so by law, or otherwise where you have expressly opted in:

- To provide you with newsletters, marketing and promotional materials and updates;
- For customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other promotional activities or events; or
- To collect information about your preferences to create a user profile to personalise and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

You have the opportunity to opt out of receiving communications from us at any time. We will not use your personal data for taking any automated decisions affecting you or creating profiles other than as described above.

Legal Grounds for processing

Depending on which of the above Permitted Purposes we use your personal data for, we may process your personal data on one or more of the following legal grounds:

- Because processing is necessary for the performance of a client instruction or other contract with you or your organisation or a third party;
- To comply with our legal obligations (e.g. to keep pension records or records for tax purposes);
- Because processing is necessary for purposes of our legitimate interest or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms; and/or
- We may process your data based on your consent where you have expressly given that to us.

How will we share your personal data?

We may share your personal data in the following circumstances:

- We may share your personal data between affiliated companies of Sornero Investments Ltd entities on a confidential basis where this is required for the purpose of providing our services, as well as for administrative, billing, security and monitoring and other business purposes. All Sornero Investments Ltd affiliated entities are based in the EU.
- We may share your personal data with any third party to whom we engage for the restaurant operation or to whom we assign or novate any of our rights or obligations and service providers, including but not limited to, IT service providers, cloud storage providers, CCTV monitoring providers or any other software providers.
- We may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process;

- We may also instruct service providers, domestically or abroad, e.g. shared service centres, software and crm systems to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. Sornero Investments Ltd will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers;
- We may also use aggregated personal data and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

Can you refuse to share your personal data with us?

In general, we receive your personal data where you provide this on a voluntary basis, and there will typically be no detrimental effect for you if you wish not to provide this or otherwise withhold your consent for it to be processed.

However, there are certain cases where we will unfortunately be unable to act without receiving such data, for example where we need to carry out legally required require such data to process your instructions or orders, or otherwise to provide you with our marketing or communications.

Where it is not possible for us to provide you with what you request without the relevant personal data, we will let you know accordingly.

How do we keep your personal data safe?

We take appropriate technical and organisational measures to keep your personal data confidential and secure, in accordance with our internal policies and procedures regarding storage of, access to and disclosure of personal data. We may keep your personal data in our electronic systems, in the systems of our contractors/service providers, or in paper files.

Personal data we receive from you about other people

Where you provide us with the personal data of other people or other persons you may have dealings with, you must ensure that you are entitled to disclose that personal data to us without being required to take further steps, we can collect, use and disclose that data in the manner described in this policy. More specifically, you must ensure that the individual whose personal data you are sharing with us is aware of the matters discussed in this Privacy Notice, as these are relevant to that individual, including our identity, how to get in touch with us, the purposes for which we collect data, our disclosure practices, and the rights of the individual in relation to our holding of the data.

Personal Data received from minors

We encourage parents or guardians to monitor the activity of children while using the internet. We do not knowingly collect any personal data of minor. If you think your child has provided any information to us, we strongly encourage that you get in touch with us and we will do our best to promptly remove such data.

Transfers of personal data abroad

We may transfer your personal data abroad if required to do so for the Permitted Purposes. In certain cases, this may include transferring data to countries which do not offer the same level of protection as the laws of your country (such as for example the data protection legislation of the EU/EEA).

When making such transfers, we will ensure that they are subject to appropriate safeguards in accordance with the General Data Protection Regulation (Regulation 2016/679) or other relevant data protection legislation. This may include, but not limited to, entering into the EU Commission's Standard Contractual Clauses. if you wish to obtain further information on the appropriate safeguards which we are adhering to please get in touch with us.

How long do we keep your personal data?

We delete your personal data once it is no longer reasonably necessary for us to keep it for the Permitted Purposes, or, where we have relied on your consent to keep your personal data unless you withdraw your consent for us to do so and we are not otherwise legally permitted or required to keep the data.

In any event, we will not keep your personal data for longer than five (5) years, unless your Personal Data is necessary for the purposes of defending or making legal claims until the end of the period during which we may retain the data and otherwise until the settlement of any such claims, as relevant.

We review our data retention policy on a regular basis so that we do not keep it longer than necessary.

What rights do you have?

Subject to certain conditions under applicable legislation, you have the right to:

- request a copy of the personal data which we hold about you;
- have any inaccurate data we hold about you corrected;
- object or restrict our use of your personal data;
- submit a complaint if you have concerns about the way in which we are handling your data.

To do any of the above, please get in touch with us to enable us to process your request, we may require that you provide us with proof of your identity, such as by providing us with a copy of a valid form of identification – this is to ensure that we appropriately protect the personal data we hold from unauthorised access requests and comply with our security obligations.

We may charge you a reasonable administrative fee for any unreasonable or excessive requests we may receive, and for any additional copies of the data you may request.

Correcting and updating your personal data

Where any personal data you have provided us with has changed, or where you believe the personal data we hold is inaccurate, please let us know.

We cannot be responsible for any loss that may arise due to us having any inaccurate, incomplete, inauthentic or otherwise deficient personal data which you.

Cookies

We may store cookies on your devices for the purposes of delivering a better user experience for you on our websites – please see our [Cookie Policy](#).

Get in touch

We would be happy to hear your views about our website and this Privacy Policy – please let us know any questions, comments or clarifications you may have by reaching out to us at:

Don Carlo Italian Restaurant, Ioanni Agroti 40, 8047, Paphos – Cyprus

Changes to our Privacy Policy

This Privacy Policy was last updated on the 29th of January 2024. We have the right to update the contents of this Privacy Policy from time to time to reflect any changes in the way in which we process your personal data or to reflect legal requirements as these may change. In case of updates, we will post the revised Privacy Policy on our website. Changes will take effect as soon as the revised version is made available on our websites.