

## Privacy Policy

Your privacy is incredibly important to us. This Privacy Policy outlines how Nineteen02 Restaurant collects, processes, stores, and protects your personal data in accordance with applicable data protection laws, including the Data Protection Act 2001 (Malta). By using our services or Platform, you agree to the terms of this Privacy Policy.

### Data Controller

For the purposes of this Privacy Policy, Nineteen02 Restaurant is the Data Controller of your personal data. You may contact us via email [info@nineteen02.mt](mailto:info@nineteen02.mt) or by post at nineteen02 restaurant, Pjazza 1902, Triq Dun G. Farrugia, Pembroke PBK 1170

### Information We Collect

We collect and use different kinds of data to provide our dining experiences and services. The types of data we may collect about you include:

- **Contact Details:** Your name, phone number, email address, and physical address.
- **Age:** Your date of birth and/or age (if provided for specific services like age-restricted events).
- **Communications:** Information from your interactions with us, including reservations, special requests, feedback, and customer service inquiries.
- **Usage Data:** Information about how you use our Platform and services (e.g., pages viewed, access times).
- **Technical Data:** Details on the devices and technology you use to access our Platform, including IP address, browser type, operating system, and unique device identifiers. This may include data gathered from cookies and other tracking technologies (please refer to our separate Cookie Policy, if applicable, for more details).
- **Financial Data:** Your credit card details, billing address, and bank account information for payment processing.
- **Contractual Data:** Details about any products or services that we provide to you.
- **CCTV Footage:** Images captured by CCTV cameras within our restaurant premises for security and safety purposes.

- **Information You Provide:**

- When you make a reservation.
- When you place an online order or make a transaction in our restaurant.
- When you purchase gift vouchers.
- When you respond to our promotions or subscribe to our mailing lists.
- When you participate in competitions or events organised by us.
- When you communicate with us by telephone, email, via our website, or through social media.
- When you register a user account on our Platform.

### **Information Provided to Third-Party Booking Systems**

Please note that when you use external online booking systems (such as Bookia/Tableo) to make reservations with us, any personal information you provide directly to those platforms is handled by the respective platform. Nineteen02 Restaurant does not control the data processing activities of these third-party systems. For details on how your data is collected, used, and protected by such platforms, please refer to their specific privacy policies.

- **Information You Provide:**

- When you make a reservation directly with us.
- When you place an online order or make a transaction in our restaurant.
- When you purchase gift vouchers.
- When you respond to our promotions or subscribe to our mailing lists.
- When you participate in competitions or events organised by us.
- When you communicate with us by telephone, email, via our website, or through social media.
- When you register a user account on our Platform.

- **Information We Collect Automatically:**

- Payment and transaction data.
- Log information (browser type, access times, pages viewed, IP address).
- Device information (hardware model, operating system, unique device identifiers).

- Information collected by cookies and other tracking technologies.
- Communication history initiated from our Platform.
- **Information We Receive from Third Parties:**
  - Our business partners, such as reservation systems (e.g., [mention specific reservation platform if applicable]), food delivery couriers (e.g., Bolt Food, Wolt), and third parties providing advertising, marketing, and promotional services.
  - Social networks (if you interact with us through them).
  - Event organisers for private dining.
  - Family members or friends who provide your data to us on your behalf (e.g., for a group booking).
  - Public agencies or other public sources where legally permissible.
- **Information We Collect Automatically:**
  - Payment and transaction data.
  - Log information (browser type, access times, pages viewed, IP address).
  - Device information (hardware model, operating system, unique device identifiers).
  - Information collected by cookies and other tracking technologies.
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  - Family members or friends who provide your data to us on your behalf (e.g., for a group booking).
  - Public agencies or other public sources where legally permissible.

## **How We Use Your Data**

We process your data for several purposes, based on the following legal grounds:

- **Performance of a Contract:**

- To manage our relationship and communicate with you.
- To process your payments and fulfil your orders (e.g., food preparation, delivery/collection).
- To manage your reservations and special requests.
- To authenticate your identity when you contact us.
- To administer and manage your account and associated services.

- **Legal Obligation:**

- To comply with applicable laws and regulations (e.g., tax, health and safety).
- To establish, defend, and enforce our legal rights.
- To deal with requests from you to exercise your rights under data protection laws.

- **Legitimate Interest:**

- To manage and audit our business operations, including accounting and IT.
- To run our business efficiently and properly (e.g., financial management, governance).
- For internal training and quality assurance purposes.
- To develop and carry out marketing activities, market research, and analysis (unless consent is required).
- To study how our customers use our products and services to improve them.
- For security and safety purposes within our restaurant premises (e.g., CCTV).
- For compliance with internal policies and procedures, risk management, and record keeping.

- **Your Consent:**

- To send you marketing communications about our latest activities, promotions, and special offers (where required by law).

- To study how you use our products and services for personalised experiences.
  - We may also ask for your consent for other purposes, which we will explain at the time. You have the right to withdraw your consent at any time by contacting us.
- **Vital Interest:**
    - To provide medical and healthcare professionals with your data in the event of an accident or medical emergency on our premises.

## How We Share Your Data

We may share your data with other parties to provide you with products and services, run our business, and comply with applicable laws. These include:

- **Within Nineteen02 Restaurant:** Primarily for business and operational purposes.
- **Third-Party Service Providers:** Companies that perform functions on our behalf and provide services to us, such as:
  - Payment service providers.
  - Reservation booking platforms.
  - Food delivery services (e.g., Bolt Food, Wolt).
  - CRM software providers.
  - IT consultants.
  - Professional advisors (e.g., lawyers, accountants).
  - Marketing and advertising agencies. These third parties are contractually obligated to protect your data and comply with similar privacy and confidentiality undertakings.
- **Business Transfers:** In connection with, or during negotiations of, any merger, sale of our assets, financing, or acquisition of all or a portion of our business by another party. Your data may be disclosed to such an entity.
- **Legal and Regulatory Requirements:** Where required to comply with a legal obligation, at the request of governmental authorities investigating, to detect and protect against fraud or security vulnerabilities, to respond to an emergency, or to protect the rights, property, safety, or security of Nineteen02 Restaurant, our customers, or the public.

## Data Security

We take reasonable precautions to protect your personal information from unauthorised access, use, or disclosure. We are committed to protecting the security, confidentiality, and integrity of your information. While we implement robust security practices, no physical or electronic security system is impenetrable, and we cannot guarantee the absolute security of our database.

## How Long We Keep Your Data

We will retain your data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Generally:

- We may keep your data for up to 3 years after your last interaction with us.
- For transaction-related data, it may be retained for up to 5 years after the transaction to comply with record-keeping obligations.
- CCTV footage shall be retained for [Insert specific timeframe, e.g., 7 days], after which it shall be irretrievably destroyed, unless otherwise required under a legal obligation. We may retain your data for longer if we cannot delete it for legal or regulatory reasons, or to respond to a question or complaint. After this time, we will securely and irretrievably destroy your data.

## Your Rights

Under data protection laws, you have the following rights regarding your personal data:

1. **The Right to Object to Processing:** You have the right to object to certain types of processing, including processing for direct marketing.
2. **The Right to Be Informed:** You have the right to be provided with clear, transparent, and easily understandable information about how we use your information and your rights. This Privacy Policy serves this purpose.
3. **The Right of Access:** You have the right to obtain access to your information (if we are processing it) and certain other information, allowing you to check that we are using your information in accordance with data protection law.
4. **The Right to Rectification:** You are entitled to have your information corrected if it is inaccurate or incomplete.
5. **The Right to Erasure (Right to Be Forgotten):** You can request the deletion or removal of your information where there's no compelling reason for us to keep using it. This right is not absolute and has exceptions.

6. **The Right to Restrict Processing:** You have the right to 'block' or suppress further use of your information. When processing is restricted, we can still store your information but may not use it further.
7. **The Right to Data Portability:** You have the right to obtain and reuse your data for your own purposes across different services, allowing you to move, copy, or transfer your information easily.
8. **The Right to Lodge a Complaint:** You have the right to lodge a complaint about the way we handle or process your data with your national data protection regulator. In Malta, this is the Information and Data Protection Commissioner (IDPC), whose website is available at <https://idpc.org.mt/>.
9. **The Right to Withdraw Consent:** If you have given your consent for any processing of your data, you have the right to withdraw your consent at any time. This includes your right to withdraw consent for marketing purposes.
10. **The Right to Be Informed of the Source:** Where we do not collect data directly from you, you have the right to be informed of the source of such data.

We usually act on requests and provide information free of charge but may charge a reasonable fee to cover our administrative costs for baseless, excessive, or repeated requests, or for further copies of the same information. We will respond to your request as soon as we can, generally within one month.

If you have any questions about this Privacy Policy or wish to exercise any of your rights, please contact us using the details in the 'Data Controller' section above.

### **Providing Personal Data Belonging to Others**

If you provide the data of anyone other than yourself (e.g., family members or friends for a booking), you are responsible for informing that person that we are collecting their data and for ensuring that you have valid permission to provide such data to us.

### **Minors**

If you are a minor under 16 years of age, please obtain consent from your parent or guardian before you submit any data to us. If you are a parent or guardian of a minor and you have reason to believe your child has provided us with their data without your prior consent, please contact us to request the erasure of their personal data or for them to be unsubscribed from our mailing lists.

### **Changes to This Privacy Policy**

We may need to make changes to this Privacy Policy at any time. If we make any material change to how we collect, use, or share your data, we will update the Privacy Policy on our Platform and inform you of these changes by our normal means of

communication (e.g., email, notice on our website). We encourage you to review this Privacy Policy periodical