



# Privacy Policy

## Introduction

This Privacy Policy applies to current and past guests/customers/suppliers of Restaurant Kong Hans Kælder.

As a data controller, data protection is a matter of great concern to us. We safeguard the personal data we process, and we ensure that we comply with data protection law.

We give the people we process data on ("data subjects") information about our data processing and about the rights that they have as data subjects.

In this Privacy Policy, we describe our processing of data on guests, customers and suppliers.

## 1. Data controller

Restaurant Kong Hans Kælder is the data controller.

Restaurant Kong Hans Kælder's contact details:

C/O Møllehegnet Holding - Skouboegruppen

Søgade 12, DK-6000 Kolding

Central Business Register No. 71 09 32 12

Tel. + 45 76 31 00 90

Contact person: Group Chief Executive Søren Bonde

E-mail: [sb@faenoe.dk](mailto:sb@faenoe.dk)

## 2. Our processing of personal data

Restaurant Kong Hans Kælder processes all personal data in accordance with applicable privacy laws.

Restaurant Kong Hans Kælder signs agreement with guests, customers and suppliers about the supply—purchases and sales—of various services and products.

When a guest/customer orders and purchases one or more of Restaurant Kong Hans Kælder's services and, as part of this, their personal data is disclosed to Restaurant Kong Hans Kælder, they also give their consent that the personal data of the guest/customer/supplier can be processed by Restaurant Kong Hans Kælder.

Therefore, the same applies to any personal data that any suppliers of Restaurant Kong Hans Kælder give to Restaurant Kong Hans Kælder in connection with the submission of quotes or when entering into agreements with Restaurant Kong Hans Kælder.



### 3. Restaurant Kong Hans Kælder's collection of personal data

Restaurant Kong Hans Kælder collects personal data in the following ways:

- When a guest/customer—or their representative—chooses to receive quotes on and/or purchase one of Restaurant Kong Hans Kælder's services/products, or when a supplier submits quotes or sells products or services to Restaurant Kong Hans Kælder.
- From B2C and B2B markets.
- Through browser cookies and web beacons.
- In connection with regular correspondence with guests/customers/suppliers.
- In connection with the use of Restaurant Kong Hans Kælder's digital services.
- When participating in Restaurant Kong Hans Kælder's potential customer/loyalty programme and by subscribing to Restaurant Kong Hans Kælder's potential newsletter.
- From social media, public relations, advertising and analysis providers, as well as public registers.
- Via CCTV surveillance.
- When suppliers enter into agreements with Restaurant Kong Hans Kælder or give Restaurant Kong Hans Kælder a quote.

The collection and processing of personal data referred to in the above will always be in accordance with applicable privacy laws.

CCTV, which may be set up, takes place in the context of crime prevention and also functions as a reassurance measure for employees and guests.

### 4. Data that Restaurant Kong Hans Kælder collects

Restaurant Kong Hans Kælder collects the following personal data:

- Name, address, telephone number, e-mail address, date of birth, and other general, non-sensitive personal data.
- Payment card details—typically to guarantee a reservation and to pay for accommodation.
- Other bank and payment details—typically as a guarantee of credit or for payment of, for example, a deposit.
- Demographic data.
- Purchase history including the use of Restaurant Kong Hans Kælder's potential app and/or other digital services.
- Payment history.
- Browser information.



- The use of Restaurant Kong Hans Kælder's potential customer/loyalty programme.
- Image data from Restaurant Kong Hans Kælder's social media and other digital platforms belonging to Restaurant Kong Hans Kælder.
- Data from Restaurant Kong Hans Kælder's social media and other digital platforms belonging to Restaurant Kong Hans Kælder.
- Data from Restaurant Kong Hans Kælder's customer surveys.
- Data from any competitions.
- Data from credit reporting agencies.
- Data about the guest's/customer's company and relevant contact persons.
- Data included in our correspondence with you.
- Data about suppliers' companies, as well as data on relevant contact persons and key persons including key accounts.

A guest/customer/supplier can voluntarily and by choice give Restaurant Kong Hans Kælder additional personal data that they consider is important to Restaurant Kong Hans Kælder's operation and servicing of the guest/customer/supplier, or that they believe should be given for security purposes.

For example, this can be data on:

- Disability.
- Allergy.
- Special food preferences.
- Other health or medical information.

If a guest/customer/supplier *voluntarily and by choice* chooses to give such data, Restaurant Kong Hans Kælder considers it as consent to record and store such sensitive data about them.

In addition to the data that Restaurant Kong Hans Kælder receives directly from guests/customers/suppliers, Restaurant Kong Hans Kælder will, in some cases, obtain or process additional data that Restaurant Kong Hans Kælder has received from third parties, for example, a travel agent, booking portal, another intermediary or an employee of the company where the data subject is employed.

Where this is the case, the third party must inform the relevant guests/customers/suppliers of Restaurant Kong Hans Kælder's Terms and Conditions, as well as the Privacy Policy of Restaurant Kong Hans Kælder. It is also the responsibility of the third party concerned to ensure that there is the necessary legal basis for collecting and processing such data, including obtaining the necessary consent to the processing of any sensitive data.



## 5. Payment by credit or debit card

Restaurant Kong Hans Kælder uses Nets to redeem payments made by debit and credit cards. Restaurant Kong Hans Kælder is approved and certified by the Danish Financial Institution's Payment System ([www.pbs.dk](http://www.pbs.dk)).

For reservations and bookings, Restaurant Kong Hans Kælder stores the data provided by the guest/customer/supplier for up to five years, after which the data is deleted.

In addition to processing the order, the data provided will only be used if a guest/customer/supplier, for example, contacts with questions or if there are errors in the order.

## 6. What is the purpose of the collection and processing?

Restaurant Kong Hans Kælder only collects personal data that is necessary to comply with the agreements entered into with guests/customers/suppliers for the provision of services, for example, a dinner arrangement, or the purchase/sale of products or services.

It is the nature of the individual agreement and the type of service which determines what personal data Restaurant Kong Hans Kælder collects and processes and which determines the purpose of the collection.

The purpose of the collection and processing of personal data will primarily be:

- To process a guest's/customer's booking and purchase of Restaurant Kong Hans Kælder's services, products and gift cards.
- To process suppliers' quotes and sales of products and services.
- To contact the guest/customer before, during or after their stay.
- To fulfil the guest's/customer's request for offers or the purchase of services.
- For the improvement and development of Restaurant Kong Hans Kælder's services.
- For the customisation of Restaurant Kong Hans Kælder's marketing, public relations and other communications.
- For the analysis and reporting of the behaviour of guests/customers/suppliers and marketing to them.
- To customise Restaurant Kong Hans Kælder's partners' communication and marketing to guests/customers/suppliers.
- Administration and maintenance of the guest/customer/supplier relationship to Restaurant Kong Hans Kælder, including possible participation in Restaurant Kong Hans Kælder's potential customer/loyalty programme, cultivation of new customers and continuous business relations.
- Compliance with legal requirements.



## 7. Legal basis for processing

Restaurant Kong Hans Kælder will most often process personal data because it is necessary to fulfil an agreement with Restaurant Kong Hans Kælder, which a guest/customer or a supplier are party to. This may for example, be in connection with arrangements, holding meetings and/or the processing and fulfilment of cooperation and supplier agreements.

Restaurant Kong Hans Kælder will also process personal data in connection with booking prior to an dinner reservation, holding meetings, companies, conferences, etc., and prior to entering into supplier agreements.

In some cases, Restaurant Kong Hans Kælder's processing of personal data will take place as part of the fact that Restaurant Kong Hans Kælder has a legitimate/factual interest that precedes the guest's/customer's/supplier's (the data subject's) interests.

Such a legitimate interest could for example, be the preparation of statistics, customer surveys, marketing and an analysis of general guest/customer behaviour, which aims to improve the overall experience at Restaurant Kong Hans Kælder and the quality of Restaurant Kong Hans Kælder's services and products.

In connection with their stay/visit to Restaurant Kong Hans Kælder, if a guest/customer discloses particular personal preferences or considerations, including, for example, medical information, disability, religious beliefs or the like, Restaurant Kong Hans Kælder only uses the data to ensure that the guest's/customer's personal preferences, well-being and health etc., are taken into account.

In some situations, Restaurant Kong Hans Kælder receives personal data from third parties such as a travel agent, an agent or similar, including in connection with group bookings or booking for individuals. When this happens, the third party must notify the relevant guests/customers/suppliers of Restaurant Kong Hans Kælder's Terms and Conditions and the content of this Privacy Policy.

## 8. Rights of the data subject

According to the rules of the General Data Protection Regulation (GDPR), data subjects (customers/guests/suppliers) have different rights.

- A data subject has the right at any time to obtain access to the personal data that Restaurant Kong Hans Kælder processes on the data subject.
- A data subject has the right at any time to rectify and update the personal data that Restaurant Kong Hans Kælder has on the data subject.
- A data subject has the right at any time to delete the personal data that Restaurant Kong Hans Kælder has on the data subject. If a data subject requests deletion, all data that Restaurant Kong Hans Kælder is not required to keep by law must be deleted. A deletion of the data subject's data may in some cases mean that Restaurant Kong Hans Kælder cannot fulfil agreements made or provide certain services to the data subject.
- If some of the data that Restaurant Kong Hans Kælder has on the data subject is given on the basis of the data subject's consent, they are entitled at any time to withdraw their consent, which means that the data is deleted or is no longer used by Restaurant Kong Hans Kælder.



This shall not apply to the data referred to above that Restaurant Kong Hans Kælder is legally obligated to store.

The option to request deletion, etc., may, however, be limited in order to protect the privacy, trade secrets and intellectual property rights of other persons and, for example, the option to enforce potential legal claims.

The data subject may at any time in writing ask Restaurant Kong Hans Kælder to obtain an overview and a copy of the personal data of the data subject that Restaurant Kong Hans Kælder possesses.

A written request to that effect must be signed by the data subject and include their name, address, telephone number and e-mail address.

The data subject may also contact Restaurant Kong Hans Kælder if the data subject believes that their personal data is being processed in contravention of the law or in breach of other legal obligations, such as the agreement/contract that the data subject has with Restaurant Kong Hans Kælder.

Written requests are to be sent to Restaurant Kong Hans Kælder, see the contact details above under section 1.

Restaurant Kong Hans Kælder will, as far as possible, within one month of receipt of the data subject's written request, reply to the data subject's postal address.

If the data subject asks for the correction and/or deletion of their personal data, then Restaurant Kong Hans Kælder will assess whether the conditions for the request have been met and Restaurant Kong Hans Kælder will make changes or deletions as soon as possible.

Restaurant Kong Hans Kælder reserves the right to reject requests which have the character of vexatious repetition, or which require disproportionate technical measures (such as the development of a new IT system), or which affect the protection of other data subjects' personal data, or in other situations where it would be disproportionately resource-intensive or very complicated to meet the request.

## 9. Security

Restaurant Kong Hans Kælder protects the personal data of the data subject and has established guidelines to protect the data subject's personal data from unauthorised disclosure and access or coming to the knowledge of unauthorised persons.

Only those persons/employees of Restaurant Kong Hans Kælder who, by virtue of their job function, need the personal data of the data subjects have access to it. Restaurant Kong Hans Kælder continually checks that there is no unauthorised access to the personal data of data subjects.

Restaurant Kong Hans Kælder regularly backs up data subjects' personal data.

In the event of a breach of security where there is a high risk of misuse of the personal data of data subjects, including, for example, of identity theft, financial loss, loss of reputation or any other form of abuse, Restaurant Kong Hans Kælder will inform the data subject of the breach as soon as possible.

Restaurant Kong Hans Kælder's security procedures are continually reviewed and updated in relation to technological developments.



## 10. Sharing personal data

We will not disclose data to any third party without your consent unless it is necessary to enable us to advise and serve you or because it is necessary to ensure compliance with applicable Danish law. We do not use your data for any purpose other than for the purposes described in this Privacy Policy.

Restaurant Kong Hans Kælder uses a number of external suppliers of IT services, IT systems, payment solutions etc.

Restaurant Kong Hans Kælder enters into ongoing data processing agreements with Restaurant Kong Hans Kælder's suppliers/our data processors, where, in accordance with the Danish Data Protection Agency, and where it is required in relation to external data processors, to ensure that a necessary and high level of security is maintained with regards to the personal data of data subjects.

In order to comply with agreements with the data subjects and to meet the needs of guests and customers, Restaurant Kong Hans Kælder shares selected personal data with external suppliers such as other restaurants, hotels, nature and culture guides, tourist attraction providers, etc. This is done only by agreement with the guest/customer in order to serve and assist the guest/customer in the best possible way in connection with the planning of, for instance, accommodation, visits to tourist attractions, preparation of transport, etc.

Restaurant Kong Hans Kælder also shares and discloses the personal data of the data subjects within the Group, including with sister companies. The purpose of this sharing is to provide the guest/customer with the best service and services, regardless of the restaurant/hotel or division of the Skouboe Group the guest/customer is using. Likewise, also as part of the Group's marketing efforts in accordance with the relevant rules.

In some cases, Restaurant Kong Hans Kælder is legally obligated to disclose personal data or obligated to do so as a result of a decision of a public authority. We disclose or pass on personal data to the following categories of recipients:

- Bank connections with regards to the management of payments.
- Debt collection and credit reporting agencies in the event of a breach of payment, as well as posting with a credit reporting agency.
- Tax authorities and other authorities in relation to statutory reporting.

## 11. Deletion of personal data

Restaurant Kong Hans Kælder deletes your personal data when Restaurant Kong Hans Kælder's legal obligation ceases or when the purpose of collecting and processing the data is no longer present. Restaurant Kong Hans Kælder generally follows the storing period that applies in accordance with the Accounting Act. In order to ensure proper handling of recurring customer relationships, potential complaints and warranty obligations and to meet our obligations, we have assessed that it is necessary to store data for up to five years and from when the current business relationship has ceased.



## 12. Cookies

Restaurant Kong Hans Kælder uses cookies. More information about Restaurant Kong Hans Kælder's cookie policy can be found on the website [www.konghans.dk](http://www.konghans.dk)

## 13. Complaints

Complaints about Restaurant Kong Hans Kælder's processing of personal data can be made to the Danish Data Protection Agency, BORGERGADE 28, 5, DK-1300 COPENHAGEN K, TELEPHONE +45 3319 3200 - E-MAIL [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

## 14. Changes to the Privacy Policy

If Restaurant Kong Hans Kælder makes changes to our Privacy Policy, these changes will always be updated on our website under the "Privacy Policy" menu point. We recommend that you regularly check our Privacy Policy on the website for any changes.

## 15. Document information

This is the 2018 version of Restaurant Kong Hans Kælder's Privacy Policy updated on 25th May 2018.