

# Information according to Art. 13 of the General Data Protection Regulation (DSGVO)

## Scope

When it comes to your data, trust is crucial. That's why we feel it's our responsibility to only collect necessary data, handle it with care, and prevent any misuse.

Seven Heavens Skylounge AG, as the owner of the Restaurant Seven Heavens (hereinafter "Seven Heavens"; "we"; "us") strictly adheres to the data protection regulations when collecting and processing your data. Below you will find information on the processing of your data and the rights to which you are entitled.

Name and contact details of the controller:

Seven Heavens Skylounge AG

Wirtschaftspark 2

LI-9492 Eschen

Liechtenstein

E-mail: [office@sevenheavens.li](mailto:office@sevenheavens.li)

Phone: +423 797 07 77

Website: <https://www.sevenheavens.li/>

Data protection queries should be submitted to our Data Protection Officer in writing by post to the above address or by e-mail to the following address: [dpo@sevenheavens.li](mailto:dpo@sevenheavens.li)

This data protection declaration applies to the processing of personal data during your visit to our restaurant Seven Heavens Skylounge AGm Wirtschaftspark 2, LI-9492 Eschen (hereinafter "Restaurant") or our Website (<https://www.sevenheavens.li>).

Please note that when we provide links to other websites, their data protection policies and statements will apply to those sites.

## A. Data processing on our Website

### Categories of personal data collected

Each time our Website is called up, our web server automatically records data and information from the computer system of the calling computer in so-called server log files. The following data is collected:

- Browser type and browser version,
- The operating system used,
- Referrer URL,
- IP address/hostname of the accessing computer,
- Time of the server request.

This data cannot be assigned to specific persons on our part. This data is not merged with other data sources. Subject to any statutory retention periods, the IP addresses of users are deleted after the end of use. The temporary storage and statistical evaluation of data that cannot be assigned to specific users serves only to ensure system security and the security of user data (e.g. the detection of any faulty links and program errors as well as attacks on the system).

### **Purpose and legal basis of the processing**

We only collect personal data from Website visitors that is necessary for the smooth functioning of the Website and to provide our content and services. This includes personal data that you have voluntarily provided to us. We process personal data in accordance with Article 6(1) DSGVO, based on either your consent (if you willingly provide us with your data, i.e. via our reservation tool) or our legitimate interest (such as ensuring system stability and security). For more information on the processing of data transmitted through online forms, please refer to the "B. General data processing by Seven Heaven" chapter.

### **Storage period**

When you provide personal information to make a reservation, we will delete it one year after our services end, unless there are other reasons for us to keep it.

If you gave us permission to use your data for direct marketing, we will keep it until you withdraw your consent or we no longer need it.

Additionally, we may hold onto personal information until the end of any legal proceedings in which it is needed as evidence.

### **Data Analysis on the Website**

We do not conduct any web analyses on the Website and do not utilize any web analysis tools. Therefore, there is no assessment of the visitor and usage data mentioned above.

### **Online form**

Our Website offers a reservation form that you can use to make a request. We will only use the information you provide in the form to process your request, and it will not be used for any other purpose or linked to other data. The data you enter in the form is transmitted in an encrypted format. For more information on how Seven Heaven processes data related to inquiries or reservations and the corresponding deletion periods, please refer to the section " B. General data processing by Seven Heaven".

### **Social Plugins**

We don't use social plugins on our Website. You can find only simple links to social media sites such as Facebook and Instagram, but we don't track your behavior.

## **B. General Data processing of Seven Heaven**

### **Categories of personal data collected**

When making a reservation through phone, email, or our reservation tool, we may collect your personal information which includes your name, surname, email address, and phone number. With your consent, we can also use this information for direct marketing purposes. Additionally, if you visit our restaurant, we use camera surveillance to capture your image, but we do not process any special category or biometric data.

### **Purpose and legal basis of the processing**

The processing of personal data in connection with your visit to the Restaurant is carried out following Article 6(1) DSGVO based on:

- The necessity of the performance of the contract, e.g. to be able to identify you as our customer, for correspondence with you, or to realise your reservation;
- Your consent, if you provide us your details voluntarily, e.g. by sending us queries via email or social media (Facebook, Instagram) or giving us consent for direct marketing;
- Our legitimate interests, e.g. where we process your data when using video surveillance. For details on data processing by Seven Heaven in the context of

camera surveillance and on the corresponding deletion periods, please refer to the following chapter "Camera monitoring system and use of camera recordings".

### **Storage period**

When you provide us with personal data for making a reservation, we will delete it one year after our services end, unless there are other reasons to keep it. If you allow us to use your data for direct marketing, we will store it until you withdraw your consent or the purpose of the processing is fulfilled.

### **Recipients or categories of recipients of the personal data**

At Seven Heavens, we ensure that our employees only access your data when it is necessary for fulfilling our contractual, legal, and supervisory obligations. We may share your information with third parties if it is required for providing our service or mandated by law, such as with banks, asset management companies, authorities, state institutions, police, and courts. However, we will never sell, rent, or disclose your personal data to any third party.

### **Transfer of personal data to a third country**

Please note that we may transfer personal data to countries where our service providers, such as software suppliers and IT service providers, are located.

A transfer of your data to recipients in a third country or to another international organisation will only take place (in addition) if the following guarantees exist:

- the third country offers an adequate level of protection for personal data according to the European Commission;
- the recipient has signed a contract based on "model contractual clauses" approved by the European Commission, which obliges it to protect personal data.

We will be happy to provide further information on the protection of your data in the event of a transfer to a specific third country upon request.

### **Camera monitoring system and use of camera recordings**

- Scope of the processing: Seven Heaven uses video surveillance in the dining room of the Restaurant with 3 video cameras on the ongoing bases. The kitchen, changing rooms, toilets, the building's common corridor, storage areas, the summer garden, and the car park are excluded from the monitoring area.

- Category of data: The cameras capture images from the restaurant, so your image is processed. Cameras do not record sound. The recording is not used to process special category data or biometric data.
- Legal basis: Seven Heavens uses monitoring to protect its legitimate interests, i.e. to ensure the highest quality of service, the safety of its guests, and the security of the property located in the Restaurant, as well as to monitor the proper performance of the Restaurant's employees.
- Recipients: Access to surveillance footage is only available to authorised Seven Heavens' employees. In the event of the discovery or suspicion of a criminal offence, as well as in situations where health or life is at risk, data may be transmitted to the relevant institutions or supervisory authorities, including the police.
- Storage period: Personal data processed through video surveillance is stored for 50 days and then automatically deleted.
- Your data will not be used for profiling and will not be subject to automated decision-making.
- Your rights concerning data processing are set out in detail below.

### **Recruitment process**

- The data controller of the personal data of our employees, associates, and persons applying for employment is Seven Heavens Skylounge AG.
- The personal data that we are provided with is used by us only for the following purposes: recruitment processes, the performance of our duties arising from the provisions of the law relating to employing workers and establishing cooperation, and, potentially, also to establish, pursue and defend claims made against us.
- The legal basis for the processing of personal data by us are the provisions of the law, the legal duty that is imposed upon us (art. 6 (1) (c) DSGVO) in the event of recruitment, to take steps at the request of the data subject before entering into a contract and to perform a contract (art. 6 (1) (b) DSGVO). We can also process data based on our legitimate interests pursued by the controller consisting in establishing, pursuing, or defending against claims in proceedings before courts or public authorities (art. 6 (1) (f) DSGVO).
- We can make our employees' data available to entities and bodies to which we are obligated to transfer the data under the provisions of the law, as well as entities

that render services on our behalf that are necessary to conduct business (e.g. accounting, legal services, services related to benefits concerning medical care, insurance and access to recreational facilities, etc.).

- We will only keep personal data stored for as long as is reasonably necessary to carry out the purposes and legal obligations outlined in this clause.
- In the case of recruitment - we will keep your data for the entire recruitment period and up to 3 months after its completion, unless you agree to participate in future recruitments, then we will store your data for 2 years.
- You have the right to: access your personal data, rectification, erasure, restrict processing, make a complaint to a supervisory authority, and the right to transfer the data. The consent to the processing of personal data may be withdrawn at any time. However, it does not affect the lawfulness of processing based on consent before its withdrawal. In the case of recruitment, withdrawing the consent will make it impossible for us to take your application documents under advisement.
- For performance of the rights related to personal data, please contact the Data Protection Officer: [dpo@sevenheavens.li](mailto:dpo@sevenheavens.li)

## C. Data security at Seven Heaven

### Website

When visiting our Website, we use the common method in conjunction with the highest level of encryption supported by your browser. You can tell whether an individual page of our Website is transmitted in encrypted form by the closed display of the key or lock symbol in the address bar of your browser. (Implemented encryption: SSL with certification Let's Encrypt).

### General data processing

In addition, we generally apply suitable technical and organisational security measures during data processing to protect your data against accidental or intentional manipulation, partial or complete loss, destruction, or against unauthorised access by third parties, such as appointing Data Protection Officer, and personnel training. We use special technical measures regarding the camera records, such as:

- the video data recorder is inaccessible to staff and unauthorised persons and is installed in a separate area under the observation of cameras;
- video records can only be accessed remotely (via the Internet) by authorised persons;

- additionally, access is secured in two stages;
- physically (due to the location of the recording device) there is no access to data from the video recorder.

## D. Your rights

You have the right to request information about any of the personal data we process. In particular, you have the right to request information about the purpose of the processing, the categories of personal data, the categories of recipients who will have access or were disclosed with your data, the duration periods for saving the personal data, whether there is a right to adjust/correct, erase, restrict or object, transmission of data, the source of your data if not collected through us and if we use automatic decision-making technologies including profiling.

Additionally, you have the right to revoke a previously granted consent to use your data at any time.

If you wish to exercise the aforementioned rights, contact us via the provided contact details.

If you believe that the processing of your data is inconsistent or contradicts the applicable data protection laws you can lodge a complaint with the Data Protection Authority of the Principality of Liechtenstein.

