

## **PRIVACY POLICY**

L. R. PAVÃO, LDA. (hereinafter referred to as ("ESQUINA - STEAKHOUSE"), wants to affirm solid and lasting relationships with its customers, based on transparency and trust. This Privacy Policy describes who we are, for what purposes we use data from holders, such as we process and store them, who we share them with, how long we keep them, as well as the ways to contact us and exercise your rights.

### Who we are?

Your personal data will be processed by L. R. PAVÃO, LDA., legal entity no. 515 438 251 with registered office at Canada das Murtas, 31, Rosto do Cão - São Roque, 9500-601 PONTA DELGADA, telephone number +351 296 914 900. ESQUINA - STEAKHOUSE is responsible for processing the personal data it collects, processes and stores, in the sense in which such expressions are defined by the General Data Protection Regulation (or "GDPR").

### **DEFINITIONS**

To ensure a better understanding of this Privacy Policy, it is important to know the concepts. For this reason, ESQUINA - STEAKHOUSE provides a glossary of the terms it considers most important:

#### Personal data

Any information relating to an identified or identifiable natural person ("data subject"); An identifiable natural person is considered to be a natural person who can be identified, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, electronic identifiers or one or more specific elements of the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### Treatment

Any operation or set of operations carried out on personal data or on sets of personal data, by automated or non-automated means, such as collection, recording, organization, structuring, conservation, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, broadcast or any other form of availability, comparison or interconnection, limitation, erasure or destruction.



# Special categories of personal data

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical convictions, or trade union membership, as well as genetic data, biometric data that uniquely identifies a person, data relating to health or data relating to sexual life or sexual orientation of a person.

# Sensitive categories of personal data

Personal data relating to the economic or financial situation of the data subject, (other) personal data that could lead to stigmatization or exclusion of the data subject, usernames, keywords and other registration elements, personal data that could be used for fraud relating to identity.

# Responsible for treatment

Natural or legal person, public authority, agency or other body which, individually or jointly with others, determines the purposes and means of processing personal data.

## Personal data breach

Breach of security that causes, accidentally or unlawfully, the unauthorized destruction, loss, alteration, disclosure or access to personal data transmitted, preserved or subject to any other type of processing.

# Privacy by default

It means ensuring that mechanisms are put in place within an organization to ensure that, by default, only the necessary amount of personal data will be collected, used and retained for each task. This obligation applies to the extent of its processing, the conservation period and its accessibility. These measures ensure that personal data is not made available without human intervention to an indefinite number of natural persons.

### **COOKIES**

Cookies are used on the ESQUINA - STEAKHOUSE website to improve your browsing experience and provide the best possible service. Cookies are small files that are stored on access devices through the browser, only retaining information related to preferences, thus not including personal data. Despite being able to manage cookies directly in the browser, by continuing to browse the website, the user will be consenting to their use; however, by disabling cookies, you may prevent some web services from functioning correctly, partially or completely affecting navigation on our website.



## **HOLDER'S RIGHTS**

Under the GDPR, data subjects have, among others, the following rights:

- Right of access;
- Right to rectification;
- Right to be forgotten;
- Right to limit treatment;
- Right to data portability;
- Right to object;
- Right to revoke consent.

Data holders may, at any time, exercise their rights, via the email address: geral@esquinasteakhouse.pt or by letter to the postal address: Canada das Murtas, 31, Rosto do Cão - São Roque, 9500-601 PONTA DELGADA. Finally, you can choose to contact the Control Authority, which, in Portugal, is exercised by the National Data Protection Commission, sending your message to geral@cnpd.pt.

# TECHNICAL, ORGANIZATIONAL AND SAFETY MEASURES

ESQUINA - STEAKHOUSE implements and ensures the maintenance of adequate protection means, so that its internal procedures for the security of personal data are in compliance with current regulations. ESQUINA - STEAKHOUSE also makes all necessary efforts to ensure that contractually the third parties with which it collaborates, as partners or service providers, guarantee adequate protection of the personal data to which they have access. ESQUINA - STEAKHOUSE limits access to personal data to specific employees, and only when their contact with such personal data is justified, within the scope of their functions. ESQUINA - STEAKHOUSE takes the necessary measures to ensure the secure processing of personal data. In particular, it takes precautionary measures to protect personal data against loss or abuse, and uses security procedures to prevent unauthorized access to such personal data.