

## PRIVACY POLICY

### I. PURPOSE OF THE PRIVACY POLICY

This Policy explains how we use and process your personal data in connection with your use of our websites/mobile applications/kiosks, including placing your orders through the websites/mobile applications/kiosks, creating and operating your user account, and handling your requests, complaints and suggestions, including those relating to marketing information addressed to you. In the Policy, you will also find information about your rights arising from our processing of your personal data and how you can exercise them.

### II. DEFINITIONS

**Controller and/or We** – Means Sushi Shop Management, a simplified joint-stock company whose registered office is in Paris, 9/11 Allée de l’Arche, Tour Égée, 92400 Courbevoie, registered with the Nanterre Trade and Companies Register under No. 493 549 349, whose share capital amounts to €98,160.00.

We wish to inform you that:

- within the Sushi Shop website/mobile application/kiosks, in certain cases your personal data may also be processed by Sushi Shop Management (simplified joint-stock company) acting as Franchisor or by a specific Franchisee. Further information on the scope and rules of processing your personal data by the Franchisor and the Franchisee can be found in Section XIII below.

**Personal data** – Information relating to an identified or identifiable natural person by one or more specific factors determining the person’s physical, physiological, genetic, mental, economic, cultural or social identity, including device IP, location data, Internet ID and information collected via cookies and similar technologies.

**Policy** – This privacy policy.

**GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC.

**UK GDPR** – The Data Protection Act 2018 (hereinafter the “applicable local legislation”).

Switzerland – The Swiss Federal Act on Data Protection (hereinafter the “applicable local legislation”).

**UAE** – The Federal law concerning the protection of personal data (hereinafter the “applicable local legislation”).

**Saudi Arabia** – The Saudi Personal Data Protection Law (hereinafter the “applicable local legislation”).

**Website** – A website managed by the Controller: [sushishop.fr](http://sushishop.fr) / [sushishop.be](http://sushishop.be) / [sushishop.lu](http://sushishop.lu) / [sushishop.eu](http://sushishop.eu) / [sushiart.ae](http://sushiart.ae) / [sushiart.sa](http://sushiart.sa).

**User and/or You** – Any natural person who browses the website and/or uses one or more of our services (including the mobile application) or the functionalities described in the Policy.

**Mobile application** – The Sushi Shop application available on the phone.

**Kiosks** – The ordering kiosks present in certain shops.

### III. PROCESSING OF DATA IN THE CONTEXT OF USING THE WEBSITE AND MOBILE APPLICATIONS

When you use the website/mobile application/kiosks, We collect the data necessary to provide the various services offered, as well as information about your activity on these channels. The detailed rules and purposes of processing the personal data collected are described below

#### A. Use of the website/mobile application/kiosks

We will process the following personal data when you use the website/mobile application/kiosks:

- a) Technical data – we may collect information about the device you use to access our website/mobile application, such as your device's IP address and operating system. In addition, for mobile devices, your device type and the device's unique advertising identifier. Certain technical information about the browser you use will also be collected.
- b) Usage data – data relating to your browsing activity on our website, mobile application or kiosks such as information about the pages you visited and when, the items you clicked on a page, the time you spent on a page, items added to your basket, etc.
- c) Location data – the following applies where you consent to the use of location data. This is precise information related to your geography, derived from your device's IP address and/or your device's location function, as well as address details entered manually. This will reveal your precise geographical coordinates. This helps us display advertising relevant to your location, for example if we want to display advertising to people in the United Kingdom only, or to show you the nearest restaurant locations.
- d) Advertising data – data relating to online advertisements we have served or attempted to serve to you, e.g., how many times a specific advertisement was served to you, the page on which the advertisement appeared, the advertisement ID, etc.
- e) User-related data – this applies when you contact us for a request, complaint or suggestion via the contact form on our website or mobile application. We process your first name, last name, email address and any other personal information you freely provide in the content of the communication.

The above personal data will be processed for the following purposes:

- a) To provide electronic services in terms of sharing the content of the website/mobile application/kiosks with users – in this case, the legal basis for processing is the necessity of processing for the performance of the contract (Article 6(1)(b) GDPR or the applicable local legislation);
- b) For analytical and statistical purposes – in this case, the legal basis for processing is our legitimate interest in carrying out analyses of your activity and preferences in order to improve the functionalities and services provided (Article 6(1) GDPR or the applicable local legislation), in connection with your consent to the storage of and access to information collected on your end device (so-called "cookies consent");
- c) To handle requests, complaints or suggestions – the legal basis for processing the above-mentioned data is the necessity to perform the contract (Article 6(1)(b) GDPR or the applicable local legislation) or our legitimate interest in being able to provide you with a response (Article 6(1)(f) GDPR or the applicable local legislation).
- d) Where necessary, to establish and potentially pursue claims or defend against claims – the legal basis for processing is the Controller's legitimate interest (Article 6(1)(f) GDPR or the applicable local legislation) in protecting its rights.

- e) For the Controller's and other entities' marketing purposes, in particular relating to the presentation of behavioural advertising – the rules for processing personal data for marketing purposes are described in the MARKETING section below.
- f) System logs – User activity on the website/mobile application/kiosks, including personal data, is recorded in system logs (special IT software used to store a chronological record of information about events and actions relating to the IT system used to provide services by Us). The information collected in the logs is processed primarily for the purpose of providing services. We also process it for technical and administrative purposes, to ensure the security and management of the IT system, and for analytical and statistical purposes – in this case, the legal basis for processing is our legitimate interest (Article 6(1)(f) GDPR or the applicable local legislation).

### **B. Registration on the website/mobile application**

In addition to the personal data listed in point A above, we will process the following personal data required when You wish to create an account:

- Title, first name, last name, email address, phone number, postal address.
- Your additional data that You may provide in the My Account tab – this data is voluntary, it is not mandatory to create an account, and You can delete it at any time.

The above personal data will be processed for the following purposes:

- a) in order to maintain and operate the user account on a given website/mobile application and on the kiosks, under the terms described in the regulations; the legal basis is the necessity to perform the contract concerning your account as well as to take steps at your request (Article 6(1)(b) GDPR or the applicable local legislation); with regard to optional data – the legal basis for processing is consent (Article 6(1)(a) GDPR or the applicable local legislation);
- b) for analytical and statistical purposes; the legal basis for processing consisting of performing analyses of your activity and preferences in order to improve the functionalities and services provided is consent (Article 6(1)(a) GDPR or the applicable local legislation) expressed by you via the cookies banner in accordance with Section V below;
- c) where necessary, to establish and possibly pursue claims or defend against claims – the legal basis for processing is the Controller's legitimate interest (Article 6(1)(f) GDPR or the applicable local legislation) in protecting its rights;
- d) for the Controller's and other entities' marketing purposes, in particular relating to the presentation of behavioural advertising – the rules for processing personal data for marketing purposes are described in the MARKETING section below;
- e) When creating the user account, you can log in using your Facebook, Google or Apple account. In this case, information about you is shared between these partners and Sushi Shop to collect the information necessary to create the Sushi Shop user account. Personal data will also be processed by Facebook, Google and Apple. For more information on the processing of your personal data by Facebook, Google and Apple, please refer to their privacy policies. Additional information about data sharing with our partners can be found in Section XI below.

### C. Placing orders

In addition to the personal data indicated in point A above, we will process the following personal data when you wish to place an order via the website/mobile application/kiosks:

- a) Title, first name, last name, age, date of birth, email address, phone number, delivery address, details of your order;
- b) Other data provided by you in connection with the order (where applicable).

The above personal data will be processed for the following purposes:

- a) To process your order, the legal basis for processing is the necessity to perform the contract and to take steps at your request (Article 6(1)(b) GDPR or the applicable local legislation);
- b) For analytical and statistical purposes, the legal basis for processing consisting of carrying out analyses of Users' activity and preferences in order to improve the functionalities and services provided is consent (Article 6(1)(a) GDPR or the applicable local legislation) expressed by you via the cookies banner in accordance with Section V below;
- c) To comply with obligations imposed on us by law, for example by accounting law or tax regulations (e.g., issuing and storing invoices and accounting documents), we will process the above personal data, as well as user account data (where applicable). The legal basis is the legal obligation imposed on us (Article 6(1)(c) GDPR or the applicable local legislation);
- d) For the Controller's and other entities' marketing purposes, in particular relating to the presentation of behavioural advertising – the rules for processing personal data for marketing purposes are described in the MARKETING section below.

In addition, We may process personal data relating to your order (including data provided in a request, complaint or suggestion, where applicable), as well as user account data (where applicable) for the following purposes:

- a) where necessary, to establish and pursue claims and to defend against claims; the legal basis is our legitimate interest consisting in the ability to establish and pursue our claims or defend against such claims (Article 6(1)(f) GDPR or the applicable local legislation);
- b) to handle requests, complaints or suggestions; the legal basis for processing the above-mentioned data is the necessity to perform the contract (Article 6(1)(b) GDPR or the applicable local legislation) or our legitimate interest consisting in the ability to provide you with a response (Article 6(1)(f) GDPR or the applicable local legislation);
- c) to assess your satisfaction and determine the quality of our services; the legal basis is our legitimate interest in obtaining relevant information in order to improve the quality of our products and services (Article 6(1)(f) GDPR or the applicable local legislation).

## D. Marketing

We will process your personal data to implement marketing activities, which may consist of:

- a) displaying marketing content that is not tailored to your preferences (contextual advertising);
- b) displaying marketing content tailored to your preferences (behavioural advertising);
- c) carrying out other types of activities related to the direct marketing of goods and services (such as sending marketing information electronically), including sending email notifications about offers or content which, in some cases, may contain marketing information (newsletter service), as well as sending in-app push notifications or SMS.

**Behavioural advertising.** Analysis and profiling for marketing purposes: In order to understand your personal preferences and behaviours so as to present you with information about the products, news and promotions we offer and which we believe are likely to interest you and will be tailored to your needs, we will create your customer profile (profiling). To create this profile, we or our trusted partners will process the personal data that you provide to us directly or which result from your activities on the website/mobile application/kiosks or directly in our shops. A list of our trusted partners, a description of the tools they use and links to their privacy policies are provided in Section IV below. The legal basis for processing the above-mentioned data is our legitimate interest consisting in examining your preferences and behaviours necessary to prepare and present you with information about our products, news and promotions which we believe are likely to interest you and will be tailored to your needs (profiling), as well as the direct marketing of our products and services (Article 6(1)(f) GDPR or the applicable local legislation).

**Marketing communications.** We will send you marketing messages about products, news and promotions offered through our communication channels (e.g., email, SMS, WebPush, mobile push). The legal basis for processing is our legitimate interest in presenting you with information about our products, news and promotions which we believe may interest you, as well as the direct marketing of our products and services (Article 6(1)(f) GDPR or applicable local legislation), in connection with your consent for us to send you marketing information.

**Loyalty program.** To participate in the Sushi Shop loyalty program, you are invited to provide certain information directly in the shop at the time of your purchase to create your My Sushi Shop number, with our teams or at the kiosks, or online on the website/mobile application. When you make a purchase in the shop, your phone number will be requested, and a My Sushi Shop loyalty number will be assigned to you. To activate your account, go to the website/application and complete your My Sushi Shop number and your personal data in accordance with point III below. When you place your first order on the Sushi Shop website/application, you are invited to create a user account. A loyalty number is assigned once the order has been placed and the user account activated.

**Social media.** The Controller processes the personal data of users who visit the Controller's social media profiles (Facebook, YouTube, Twitter, Instagram) or leave information about the Controller's activity on other sites, for example Google's notification service. This data is processed exclusively for the purpose of operating the profile, and to:

- a) inform users about the Controller's activity and promote different types of events, services and products. The legal basis for the processing of personal data by the Controller is legitimate interest (Article 6(1)(f) GDPR or the applicable local legislation) consisting in the promotion of its own brand.

- b) examine the satisfaction of our customers and determine the quality of our services. The legal basis for processing the above-mentioned data is our legitimate interest in obtaining relevant information to improve the quality of our products and services (Article 6(1)(f) GDPR or the applicable local legislation);
- c) where necessary, establish and pursue claims and defend against claims; the legal basis is our legitimate interest consisting in establishing and pursuing our claims or defend against such claims (Article 6(1)(f) GDPR or the applicable local legislation).

When you use our social media profiles, data may be transferred outside the EEA.

#### **IV. COOKIES AND SIMILAR TECHNOLOGIES**

Cookies are small text files installed on the User's device when browsing the Website/mobile application. Cookies collect information that makes it easier to use the above-mentioned channels, for example by remembering the User's visits to the Website and the activities performed by the User there. A detailed description of the cookies used is available in the cookie management tool (link available at the bottom of the Website/mobile application under "Cookie settings"). Below you will find a general description of the categories of these tools we use:

- a) **STRICTLY NECESSARY COOKIES** – The Controller uses so-called necessary cookies mainly to provide the User with services supplied electronically and to improve the quality of those services. Our use of essential cookies is necessary for the proper functioning of the Website/mobile application. These files are installed in particular to remember login sessions or the completion of forms, as well as for purposes related to setting privacy options.
- b) **STATISTICS AND AUDIENCE MEASUREMENT COOKIES** – Analytical cookies allow us to monitor the number of visits and traffic sources on our Website/mobile application. They help us know which pages are more or less popular and to understand how users move around the page. This allows us to study statistics and improve the performance of our channels. The information these cookies collect is aggregated, so it is not intended to identify you. If you do not allow these cookies, we will not know when you have visited our Website/mobile application.
- c) **PERSONALISATION COOKIES** – Functional cookies remember and adapt the Website/mobile application to your choices, such as language preferences. You can set your browser to block or alert you about essential and functional cookies, but as a consequence some parts of the chain will not function properly.
- d) **ADVERTISING COOKIES** – Marketing and advertising cookies allow the content of the advertising displayed to be tailored to your interests, not only on the Website/mobile application but also outside it. They may be set by advertising partners via our Website/mobile application. Based on the information from these cookies and activity on other websites, your interest profile is built. Marketing and advertising cookies do not directly store your personal data, but they identify your web browser and hardware. If you do not allow these cookies, we will still be able to show you advertisements, but they will not be tailored to your preferences.
- e) **SOCIAL-NETWORK SHARING COOKIE** – Buttons redirecting to social networks (Facebook, Instagram, Twitter, LinkedIn) allow you to share certain content present on the Website on these platforms. For more information on the processing of your Data by these social networks, please consult their privacy policy or our Cookies Policy on the Website and the application.

## V. MANAGING COOKIE SETTINGS

The use of cookies to collect data through them, including access to data stored on the User's device, requires your consent. The website/mobile application obtains the User's consent via the cookie banner. This consent can be withdrawn at any time under the rules described below. Consent is not required for necessary cookies, the use of which is required to provide a telecommunications service on the website/mobile application (transmission of data to display content). In addition to consenting to the installation of cookies via the banner, you must maintain the appropriate browser settings allowing cookies from the website/mobile application to be stored on your end device.

Withdrawal of consent to the collection of cookies on the Website/Mobile Application is possible via the cookie banner. You can return to the banner by clicking the "Manage cookies" button, which is available on each sub-page of the Website/Mobile Application. After the banner is displayed, you can withdraw your consent by clicking the "Manage cookies" button. Next, you must move the slider next to the selected cookie category and press "Save settings and close". Withdrawal of consent to the use of cookies is also possible via your browser settings. Detailed information can be found at the links below:

- o Mozilla Firefox: <http://support.mozilla.org/pl/kb/ciasteczka>
- o Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- o Opera: <http://help.opera.com/Windows/12.10/pl/cookies.html>
- o Safari: <https://support.apple.com/kb/PH5042?locale=en-GB>

The user can check the status of their current privacy settings for the browser used at any time by using the tools available at the following links:

- o <http://www.youronlinechoices.com/pl/twojewybyory>
- o <http://optout.aboutads.info/?c=2&lang=EN>

Changing your browser settings may restrict the use of essential and optional cookies. However, please note that this may significantly hinder or prevent the use of the website/mobile application

## VI. ANALYTICS AND MARKETING TOOLS USED BY THE CONTROLLER

We and our trusted partners use various solutions and tools for analytics and marketing purposes. Our partners may use cookies and similar technologies to collect or receive information from our website and other places on the Internet and use it to provide measurement services and targeted advertising.

Trusted partners are e-commerce and advertising companies, media houses and similar organisations operating under their own name, with whom we cooperate or who are recommended by international industry organisations such as the IAB (Interactive Advertising Bureau). The list of trusted partners can be consulted [here] and in the cookie settings—the use of the cookie settings is described in Section V above.

The following social-media solutions apply to all our brands — Social-media plug-ins: the websites use social-media plug-ins (Facebook, Google+, LinkedIn, Twitter). Plug-ins allow the user to share the content published on the Website within the selected social network. The use of plug-ins on the Website allows a given social network to receive information about the Website user's activity, which may be attributed to the user profile created in that social network. The Controller has no knowledge



of the purpose and scope of data collection by social networks. Detailed information can be found at the following links:

- a. Facebook : <https://www.facebook.com/policy.php>
- b. Google : [https://privacy.google.com/take-control.html?categories\\_activeEl=sign-in](https://privacy.google.com/take-control.html?categories_activeEl=sign-in)
- c. LinkedIn : [https://www.linkedin.com/legal/privacy-policy?\\_l=pl\\_PL](https://www.linkedin.com/legal/privacy-policy?_l=pl_PL)
- d. Twitter : <https://twitter.com/en/privacy>

## **VII. PURPOSES AND LEGAL BASIS IN OTHER CASES — EMAIL AND TRADITIONAL CORRESPONDENCE**

Where contact is made with the Controller by means of electronic correspondence (email) or traditional correspondence that is not related to services provided on behalf of the sender or to another contract concluded with the sender, the personal data contained in such correspondence is processed solely for the purposes of communication and the resolution of the matter to which the correspondence relates. The legal basis for processing is the Controller's legitimate interest (Article 6(1)(f) GDPR or applicable local legislation) in conducting the correspondence addressed to it as part of its professional activity.

The Controller processes only the personal data relevant to the matter to which the correspondence relates. All correspondence is stored in a manner that ensures the security of the personal data (and other information) it contains and is disclosed only to authorised persons.

### **TELEPHONE CONTACT**

In the event of telephone contact with the Controller regarding matters not related to a concluded contract or services rendered, the Controller may ask you to provide personal data only if it is necessary to handle the case related to the telephone call. In this case, the legal basis is legitimate interest (Article 6(1)(f) GDPR or applicable local legislation) consisting in the need to resolve the reported case related to its business activity.

### **VIDEO SURVEILLANCE**

To ensure the safety of persons and property, the Controller uses visual surveillance on its premises and in restaurants. The data thus collected is not used for other purposes. Personal data recorded in the context of visual surveillance is processed in order to ensure security and order on the premises and, where applicable, to defend against or pursue claims. The legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR or applicable local legislation) in ensuring the safety of persons inside buildings and on premises managed by the Controller, including ensuring the safety of employees and guests, as well as the Controller's property and the protection of its rights.

### **COLLECTION OF DATA IN THE CONTEXT OF SERVICE PROVISION OR THE PERFORMANCE OF OTHER CONTRACTS**

Where data is collected for purposes related to the conclusion or performance of a particular contract, the Controller provides the person concerned with detailed information regarding such data processing at the time the contract is concluded. The legal basis is the conclusion or performance of the contract (Article 6(1)(b) GDPR or applicable local legislation).

### **COLLECTION OF DATA IN OTHER CASES**

The Controller also collects personal data in the course of its activity in other cases—for example, during business meetings, industry events or by exchanging business cards—for purposes related to



establishing and maintaining professional contacts. In this case, the legal basis is the Controller's legitimate interest (Article 6(1)(f) GDPR or applicable local legislation) in building a network of contacts related to its activity. Personal data collected in these cases is processed only for the purposes for which it was collected and the Controller ensures its adequate protection.

Personal data will be processed in an IT environment, which means that it may also be stored and temporarily processed to ensure the security and proper functioning of IT systems, for example as part of making backup copies, testing changes to IT systems, detecting irregularities or protection against misuse and attacks.

## **VIII. RETENTION SCHEDULE FOR PERSONAL DATA**

The duration of data processing by the Controller depends on the type of service provided and the purpose of the processing. As a general rule, data is processed for the duration of the service or the execution of the order, until the consent given has been withdrawn or an effective objection to data processing has been expressed, in cases where the legal basis for processing is linked to the Controller's legitimate interest. The period of data processing may be extended where processing is necessary to establish and assert possible claims or to defend against claims and, after this period, only where and to the extent required by law. At the end of the processing period, data is deleted or irreversibly anonymised.

Details of the retention schedule can be obtained from the point of contact indicated in Section XIII below.

## **IX. RIGHTS RELATING TO THE PROCESSING OF PERSONAL DATA**

You have the right to: access data and request its rectification, erasure, restriction of processing, the right to data portability and the right to object to data processing. If you wish to exercise any of the above rights, please use the contact details provided in Section XIV below. Please note that:

- a) You will not have to pay a fee to access your personal data (or to exercise any of your other rights); however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We may also refuse to comply with your request in these circumstances.
- b) We may ask you for specific information to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure intended to ensure that personal data is not disclosed to people who do not have the right to receive it. We may also contact you to ask you for additional information related to your request to speed up our response.
- c) We endeavour to respond to all legitimate requests within one month. It may happen that we need to take more than one month if your request is particularly complex or if you have made several requests. In this case, we will inform you and keep you updated.
- d) In certain circumstances, we may have to limit the scope of the response to the data-subject rights request—for example where a request is made to delete data that must be retained for legal or regulatory reasons, or where responding may expose the personal data of another data subject.

- e) You have the right to lodge a complaint at any time with your local supervisory authority, the Commission Nationale de l'Informatique et des Libertés ("CNIL"). However, we would appreciate the opportunity to address your concerns before you contact the local supervisory authority. We therefore encourage you to contact us first.

If you wish to withdraw your consent or change the form of commercial communication, you can do so at any time. Depending on the option you have chosen, we may contact you electronically, such as by email, or by means of telecommunications devices, such as short message services ("SMS") or multimedia messaging services ("MMS"), as well as by notification via the mobile application. The simplest way to withdraw your consent or make changes is to log in and change the setting directly in your account or to write to AmRest Customer Care: [rgpd.sushishop@amrest.eu](mailto:rgpd.sushishop@amrest.eu), or via the contact form. To disable push notifications, the user logs into their account directly on their mobile phone and changes the relevant option in the settings.

#### **X. DO YOU HAVE TO PROVIDE YOUR PERSONAL DATA?**

It is necessary for you to provide us with your personal data in order to use a given website/mobile application functionality—for example, to conclude and perform a contract concerning the user account, to order a meal or to use the contact form on a given website/mobile application. If you do not provide this information, we will not be able to enable you to fully use the functionality, for example, we will not be able to set up and maintain your user account, fulfil your order or process your request, complaint or suggestion submitted via the contact form.

#### **XI. SHARING OF PERSONAL DATA**

Your personal data is transferred to entities that provide us with services, such as IT systems and service providers; entities providing administrative support; marketing agencies and media houses; delivery companies; entities providing accounting and administrative services; entities carrying out satisfaction surveys on our behalf; entities supporting us in customer service (e.g., call centres). We may also share personal data with entities related to us, including companies within our financial group. In some situations, data may also be shared in the context of potential business transactions; for example, if we restructure our business or if we purchase or sell a business or assets, we may share your data with the potential buyer or seller.

Where we share your data with third parties or other entities within AmRest, the data shared will be limited to that required by the third party or the other entity within AmRest to provide the required processing. In this case, your personal data is protected by data-processing agreements, committing the outsourced service providers to process your personal data for specific purposes and in accordance with our instructions, to comply with the GDPR and to apply appropriate security measures to protect your personal information in accordance with our internal policies. All transfers outside the EEA to countries that are considered by the European Commission as not offering an adequate level of

protection of personal information are safeguarded with an agreement based on Standard Contractual Clauses approved by the European Commission.

Further information on data sharing can be obtained from the contact point specified in Section XIII below.

## **XII. USE OF AUTOMATED DECISION-MAKING**

We will not take any decision concerning you that is based solely on the automated processing of your data and that creates legal consequences for you or otherwise significantly affects you.

## **XIII. SUSHI SHOP FRANCHISE**

Franchisees. Please note that, since you may place orders in a franchised Sushi Shop restaurant, your personal data may also be processed by a specific Franchisee. In this respect, they will be a separate Controller of your personal data. This processing will take place primarily to the extent necessary for the execution of the order you have placed in a specific franchised restaurant via the website/mobile application/kiosks. In this respect, your personal data will be processed by a given Franchisee for the following purposes:

- a) to execute your order—the legal basis for processing is the necessity to perform the contract and to take steps at your request (Article 6(1)(b) GDPR or applicable local legislation); in the case of optional data, the legal basis is consent (Article 6(1)(a) GDPR or applicable local legislation);
- b) to comply with obligations imposed on the Franchisee by law, for example by accounting law or tax regulations (e.g., issuing and storing invoices and accounting documents), the Franchisee will process your order data; the legal basis is the legal obligation imposed on the Franchisee (Article 6(1)(c) GDPR or applicable local legislation);
- c) to handle requests, complaints or suggestions. To handle your request, complaint or suggestion submitted via the customer-service form, the Franchisee will process your data provided in the request, complaint or suggestion. Secondly, the legal basis for processing the above-mentioned data is the necessity to perform the contract (Article 6(1)(b) GDPR or applicable local legislation) or the legitimate interest of the Franchisee in being able to respond to you (Article 6(1)(f) GDPR or applicable local legislation);
- d) to exercise your rights described in Section IX above concerning your order in the franchisee's restaurant that was placed via the website/mobile application/kiosks. For this purpose, the Franchisee will process your data related to the execution of the request. Secondly, the legal basis is the Franchisee's legitimate interest consisting in the possibility of exercising your subjective right (Article 6(1)(f) GDPR or applicable local legislation);
- e) to establish and pursue possible claims and to defend against such claims—the legal basis is the Franchisee's legitimate interest (Article 6(1)(f) GDPR or applicable local legislation).

In addition, your personal data may be processed by separate Franchisees in the context of your stay in a franchised restaurant. This processing will take place, for example, to the extent that your image is captured by video surveillance used in a given restaurant. In this case, you will be separately informed of the identity of the Controller, as well as the rules for processing your data in the context of your visit to a specific restaurant.

## Joint Controller

We also inform you that, in the context of placing orders in franchised restaurants via the website/mobile application/kiosks, your personal data may be jointly controlled by Sushi Shop Management and the Franchisee. The legal basis for processing your personal data in the field of joint controllership is the legitimate interest of the joint controllers (Article 6(1)(f) GDPR or applicable local legislation), consisting in the effective management of the franchise network through consistent order-execution rules.

In this context, the joint Controllers of your personal data are Sushi Shop Management (both based in Paris: 9/11 Allée de l'Arche, Tour Égée, 92400 Courbevoie, La Défense) and a Franchisee operating a franchised restaurant where your order was placed. Joint controllership may also be established only between us and the Franchisor, insofar as we process your personal data collected in the context of the execution of an order placed in a franchised restaurant, in order to carry out the analytical, statistical and marketing activities described in the "MARKETING" section. The legal basis is our legitimate interest and that of the Franchisor (Article 6(1)(f) GDPR or applicable local legislation), consisting in the effective management of the franchise network, including ensuring coherent marketing communication.

The joint controllers have concluded joint-controllership agreements, in which they have jointly agreed their respective roles and responsibilities to fulfil specific obligations regarding the protection and processing of personal data. The joint controllers have agreed that the point of contact, pursuant to Article 26(1) GDPR, will be provided by Sushi Shop Management, whose registered office is at 9/11 Allée de l'Arche, Tour Égée, 92400 Courbevoie, La Défense, which can be contacted by email: [dpo.fr@amrest.eu](mailto:dpo.fr@amrest.eu). The provisions of this Policy apply to joint controllers only where clearly indicated.

## XIV. CONTACT DETAILS

We have appointed a Data Protection Officer whom you can contact for any questions relating to our processing of your personal data and to exercise your rights in relation to our processing of your personal data.

The Data Protection Officer can be contacted by:

- a) sending us an email at [dpo.fr@amrest.eu](mailto:dpo.fr@amrest.eu) ;
- b) sending a letter (preferably to the attention of "Data Protection Officer") to: AmRest France, 9/11 Allée de l'Arche, Tour Égée 92400 Courbevoie.

## XV. CHANGES TO THE PRIVACY POLICY

The Policy is continuously reviewed and updated as necessary. The current version of the Policy has been adopted and is effective since 11/08/2025.