

Data Privacy Policy of the VAPIANO PEOPLE Programme

Effective on: 30 August 2013

We hold the protection of your personal in very high esteem. Therefore, we would like to inform you on the processing of your data in connection with the VAPIANO PEOPLE Programme.

1. Data Controller

Personal data in connection with participants of the VAPIANO PEOPLE Programme will be collected, processed and used by the Vapiano International Marketing GmbH, Kurt-Schumacher-Str. 22, 53113 Bonn, Germany (hereinafter: „Vapiano“ or "We").

2. Purpose of the Collection, Processing and Use of Personal Data

Vapiano collects, processes or uses your personal data which you have provided via the VAPIANO website, via VAPIANO App or in handwritten form - unless otherwise indicated - for the following purposes:

- to process your registration for the VAPIANO PEOPLE Programme and to generate a respective customer account,
- to enable you the participation in the VAPIANO PEOPLE Programme in all participating restaurants worldwide,
- to give you access to your customer profile on the website *www.vapiano-people.com* and to the offers which you may find there,
- to send you an e-mail for your birthday with a birthday present,
- for anonymous, internal, statistic market research purposes in order to help us improving our response to your individual needs,
- to contact you in case of questions in connection with your VAPIANO PEOPLE customer account,
- to inform you on changes with regard to this Data Privacy Policy,
- for identification purposes at the cash desk,
- to provide you with further information, in the event that you have expressively asked Vapiano for respective information,
- for the usage of the Vapiano Finder of the Vapiano App, in order to find the closest Vapiano restaurant,
- for the provision of the payment function, which we cannot offer in every participating countries,
- to send you our newsletter, in case you ordered it,

- to notify you on the organization of competitions in connection with VAPIANO PEOPLE and winnings,
- for any other lawful purpose.

3. Category of Data collected, processed and used by Vapiano

3.1 Provision of your Customer Account

Vapiano may collect, process and use the following personal information in order to provide you with your customer account after your application:

- name,
- address,
- date of birth,
- e-mail address,
- your VAPIANO PEOPLE Card's number,
- password.

3.2 Identification at the Cash Desk

When using the VAPIANO PEOPLE Card or the Vapiano App we may collect, process or use the following data in order to identify you at the cash desk as the card owner respective the entitled participant:

- name,
- date of birth.

3.3 Collecting of PEOPLE Points or Status Points

When you collect PEOPLE Points or Status Points we collect, process or use via the participating Vapiano restaurants the following data for internal, statistic information purposes:

- date and time of your visit,
- place of restaurant,
- total turnover (sold products and foods),
- total number of visits,
- redeemed PEOPLE scores,
- redeemed birthday presents.

3.4 Use of card in participating restaurants

To enable you to use your VAPIANO PEOPLE Card or App in any participating restaurant, Vapiano transfers the following information to these restaurants:

- name,
- date of birth,
- score of points,
- PEOPLE status: RED, OLIVE, BLACK.



3.5 Vapiano Newsletter

In the event that you ordered the Vapiano newsletter, the following data will be collected, processed and used by us:

- name,
- e-mail address.

3.6 Vapiano Finder

For the usage of the Vapiano Finder of the Vapiano App to find the next Vapiano restaurant, we collect, process and use:

- your GPS location data, in case you have activated this function.

4. VAPIANO PEOPLE Card

A pseudonymized participant number will be stored in the QR code ("Quick Response") on your VAPIANO PEOPLE Card. In case you report the loss of the VAPIANO PEOPLE Card, the card will be blocked immediately. PEOPLE Points or Status Points and personal data provided by you, will be stored in the system only. This way, in case of loss of the VAPIANO PEOPLE Card none of your personal data will be lost or be made available to third parties.

5. VAPIANO App

A mobile app is provided by Vapiano. You can identify yourself as a participant of the VAPIANO PEOPLE Programme by your personal QR code at the cash desk and use all functions of the VAPIANO PEOPLE Programme without a VAPIANO PEOPLE Card. You can find the next Vapiano restaurant by this app via the Vapiano Finder. For this purpose we need either your GPS location data or you insert your actual location data into the app yourself.

6. Newsletter

Vapiano provides you with a newsletter in order to inform you on our current offers, own products and services, as well as promotional activities. You receive the Vapiano Newsletter via e-mail in the event, that you have expressively given your consent by clicking on "JA, ICH MÖCHTE DEN VAPIANO NEWSLETTER BESTELLEN" ("YES, I WANT TO ORDER THE VAPIANO NEWSLETTER").

You may revoke your consent at any time either on the website at "Mein Vapiano"/"Einstellungen"/"Neuigkeiten" ("My Vapiano"/"Settings"/"News") by clicking on "ABBESTELLT" ("UNSUBSCRIBED") in the row "NEWSLETTER", or by sending a notification or e-mail (people@vapiano-people.com) to Vapiano. The revocation has no impact as to the participation in the VAPIANO PEOPLE Programme.

7. Disclosure of Data to Third Parties

7.1 Usage of service providers

Vapiano uses service providers in order to realize the VAPIANO PEOPLE Programme in Germany. The service providers will process the data exclusively according to the instructions of Vapiano and have been obliged to comply with the valid data protection provisions. Vapiano and its assigned service providers will take reasonable technical and organizational precautions in order to protect the data of the participants.

7.2 Disclosure to participating Vapiano restaurants in Germany and abroad

In general, the VAPIANO PEOPLE Programme is designed to enable its participants the usage of the VAPIANO PEOPLE Card in all participating Vapiano restaurants worldwide. Therefore and for the purposes as listed under Section 2, Vapiano has to transmit the personal data as listed under Section 3.4 to the participating Vapiano restaurants.

7.3 Disclosure to further third parties

Apart from that, Vapiano will not transmit your personal data to any third parties, unless we should be obliged to do so because of legal regulations (e.g. disclosure to courts or law enforcement authorities), you should have given us your explicit consent, or the disclosure should be permitted by law. Vapiano will not transfer a participant's data to address sellers or to other companies for advertising purposes.

8. Termination of VAPIANO PEOPLE Membership

You may terminate your membership with the VAPIANO PEOPLE Programme at any time. With the termination of your membership, all your personal data will be completely anonymized with the exception of those data, for which a statutory permission exists.

9. Right to Information

You have the right to be informed with regard to your personal data stored within the VAPIANO PEOPLE Programme free of charge. You can find the corresponding contact details in Section 11 of this Data Privacy Policy

10. Modification of VAPIANO PEOPLE Data Privacy Policy

We may modify this Policy from time to time and adjust it according to the underlying data processing. When we make changes to this Policy we will inform via our website, via app or via e-mail.



11. Questions, Suggestions, and Comments

We are happy to answer your questions and receive your suggestions and comments regarding this Data Privacy Policy for the VAPIANO PEOPLE Programme.

If you have any queries concerning the processing of your personal data, you may use our contact form at <http://www.vapiano-people.com> or you may address your query via email to people@vapiano-people.com, via phone (+49 (0)800 3838382) or via e-mail to:

**Vapiano International Marketing GmbH,
Kurt-Schumacher-Str. 22,
53113 Bonn, Germany.**

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