

GoodResto Portal - Privacy Policy

Effective on April 13, 2026

INTRODUCTION

This Privacy Policy, hereinafter referred to as the "Privacy Policy", sets forth the rules for using the Portal.

All capitalized terms used in this Privacy Policy shall have the same meanings ascribed to them in the GoodResto Portal - Terms of Service, unless expressly stated otherwise.

DATA CONTROLLER AND CONTACT INFORMATION

The controller of your personal data is:

Goodresto sp. z o.o., Aleje Jerozolimskie 89/43, 02-001 Warszawa, Poland

KRS: 0001124926

NIP: 7011221145

You can contact us via:

- Postal mail: Goodresto sp. z o.o., Aleje Jerozolimskie 89/43, 02-001 Warszawa, Poland, lub
- E-mail: contact@goodresto.app

SCOPE OF APPLICATION

This Privacy Policy applies to processing of Personal Data of:

- Venue Representatives and Venue Workers who use the GoodResto Portal.
- Clients, whose Personal Data may be processed within the Portal for the purpose of managing Reservations, Tips, Vouchers, Deposits and whose Personal Data GoodResto enables to a Venue for specific purposes.

This policy applies only to the Portal.

Separate Privacy Policies apply to GoodResto App & Website.

TYPES OF PERSONAL DATA PROCESSED

Data of Venue Representatives and Venue Workers.

We process Personal Data provided during account registration and use of the Portal, including but not limited to:

- First name and last name
- Business role
- Telephone number

- E-mail address
- Account login credentials (encrypted password)

For invoicing purposes, we process

- Venue legal name
- Venue address
- Tax Identification Number (or equivalent)

Data collected automatically:

When you use the Portal, we may collect:

- IP address
- Device and browser information
- Login activity and technical logs
- Usage logs for security and fraud prevention

Referral or incentive programs:

If Venue Representatives or Venue Workers that are participating in incentive or referral programs offered by the Service Provider, GoodResto may collect and process Personal Data such as bank account details for the purpose of administering payments in accordance with applicable data protection laws – enrolment to a program requires additional acceptance of terms and privacy policy for the initiative.

Clients Personal Data:

The Portal contains Personal Data of Clients and Venue Clients.

Depending on the origin of data:

- For Clients: GoodResto and the Venue are each **independent data controllers**.
- For Venue Clients: the Venue is the **data controller**, and GoodResto processes such data solely as a **data processor** providing the reservation management system.

If a Client voluntarily provides dietary or allergy-related information during reservation, this information is only transmitted to the Venue. GoodResto does not verify, interpret, or act upon such information.

PURPOSES AND LEGAL BASES FOR PROCESSING

We process Personal Data to:

- create and maintain Portal accounts,
- provide Reservation and Client's record management features,
- provide Additional Features
- provide technical support,

- secure and monitor the system,
- meet legal obligations (e.g., tax and accounting),
- carry out GoodResto's direct marketing only where consent was given.

Legal bases for processing include:

- performance of a contract – GDPR art. 6(1)(b),
- legal obligation – art. 6(1)(c),
- legitimate interest in securing the Portal – art. 6(1)(f),
- consent for marketing communications – art. 6(1)(a).

OPERATIONAL MESSAGES

The Portal may send transactional communications to Client or Venue Client on behalf of the Venue, including reservation confirmations, reminders, updates, cancellation messages, post-visit review requests, payment confirmations, bought Vouchers. These communications are not marketing and do not require Marketing Consent. They are necessary to perform the Reservation and Additional Features and are sent based on Art. 6(1)(b) GDPR (performance of a contract) or Art. 6(1)(f) GDPR (legitimate interest in preventing no-shows, ensuring reservation management, confirming transactions).

ROLES IN PERSONAL DATA PROCESSING

GoodResto processes Personal Data in different roles depending on how the data is obtained:

- When GoodResto Client makes a Reservation through the App or Website, GoodResto is an independent Data Controller for the operation of the account and communication. Once Reservation details are shared with the Venue, the Venue becomes an independent Data Controller for fulfilling the Reservation.
- When a Client makes a Reservation through the Website, GoodResto is a Data Controller for processing required data to transmit and confirm the Reservation. After the Reservation details are transferred to the Venue, the Venue acts as an independent Data Controller for fulfilling the Reservation.
- When the Venue manually enters Venue Client's data (e.g. walk-in, email, or phone reservations), the Venue is the Data Controller of such Personal Data. In such cases, GoodResto acts solely as a Data Processor, providing technical storage, communication functionalities, and system infrastructure on behalf of the Venue.

Marketing consents apply only to the party to whom they were granted.

GoodResto and the Venue do not act as joint controllers.

VENUE CLIENT - MANUAL ENTRY

The Venue may manually Venue Clients into the Portal. By doing so, the Venue represents and warrants that:

1. The data was collected lawfully, and the Venue Client was informed about processing.
2. The data will be used solely for managing reservations and customer relations.
If the Venue requests GoodResto to send SMS or email notifications to the Venue Client, the Venue has obtained the Venue Client's authorization to receive such communications.

For manually entered data:

- the Venue acts as the sole Data Controller for manually entered Venue Client's data. GoodResto acts only as a Data Processor in this context,
- GoodResto processes such data only on the Venue's behalf,
- the Venue is solely responsible for the accuracy, lawful basis, retention, and consent management.

Any segmentation, notes, tags, or internal labels applied to Clients and Venue Clients are performed by the Venue and are not reviewed or validated by GoodResto.

If a manually entered Venue Client later submits a reservation independently through GoodResto Services, GoodResto becomes an independent Data Controller for Personal Data related to that independent interaction.

OBLIGATION TO PROVIDE DATA

Providing personal data is voluntary but necessary to use the Services. Without this data, we will not be able to create or manage your account or provide functionalities.

DATA SHARING

We may share your Personal Data with:

- Trusted service providers such as IT companies, accounting firms, marketing agencies, analytics providers, or payment processors, but only to the extent necessary for the delivery of our services;
- Advisors such as legal, accounting or tax;
- Entities affiliated with Goodresto, if necessary for internal administrative purposes;
- Public authorities or regulatory bodies when required by applicable laws or legitimate legal requests
- Communication providers (SMS / email sending),

Data is hosted in the European Union.

In principle, we do not transfer your personal data outside the European Economic Area (EEA). If such transfer becomes necessary, it will only be done in accordance with applicable legal requirements and with the use of appropriate safeguards, such as standard contractual clauses approved by the European Commission.

DATA SECURITY

We apply organizational and technical safeguards, including:

- access control and internal authorization procedures,
- security monitoring and logging.

DATA RETENTION

Personal Data is retained only as long as necessary to fulfill the purposes described above, unless longer retention is required by law.

Account data is kept while the account is active and for a period of up to 3 years after account deletion or termination, for the purpose of managing legal claims, resolving disputes, and ensuring compliance with applicable law. Financial and invoicing data may be retained for longer periods where required by tax or accounting regulations (typically up to 5 years under Polish law).

VENUE WORKER – ACCESS TO THIS POLICY

The registration link sent by GoodResto to a Venue Worker contains, or includes a reference to, this Privacy Policy. By completing registration and accessing the Portal, the Venue Worker confirms that they have been informed about the processing of their Personal Data as described in this Privacy Policy. The Venue Representative is responsible for ensuring that Venue Workers are made aware of this Privacy Policy prior to being invited to the Portal.

RIGHTS OF DATA SUBJECT

You may request:

- access to your Personal Data,
- rectification or update,
- erasure (where legally permitted),
- restriction of processing,
- objection to processing,
- withdrawal of marketing consent (if provided).

To exercise your rights, contact us at: contact@goodresto.app

CHANGE TO THIS PRIVACY POLICY

If we make material changes to this Privacy Policy, and you are not accepting changes, then you should cease using the Services.