

Privacy Policy

Last updated: 21 July 2026

Sommi, a trade name of De Koele Eenmanszaak ("Sommi", "we", "us", "our") — Spaarndammerplantsoen 67, 1013 XR Amsterdam, KVK number 42002656, VAT number NL005426322B56, Netherlands

1. Who We Are

This Privacy Policy explains how Sommi, operated by De Koele Eenmanszaak, collects, uses, and protects personal data when you use the Sommi website and app (the "Service"). Sommi is used by two types of people:

- **Restaurant Guests** — individual diners using the Sommi app to get food and drink pairing recommendations; and
- **Restaurant Customers** — restaurants, staff, and business contacts who license Sommi as a business tool.

Sommi is the data controller for the personal data described in this Policy, unless stated otherwise.

2. What Data We Collect

2.1 From Restaurant Guests

Category	Examples
Account data	Name, email address, password, language preference
Demographic data	Age (or age range) and gender, provided voluntarily during profile setup
Preference data	Taste preferences, dietary restrictions, favorite drinks, allergens
Usage data	Pairing history, saved favorites, ratings, reviews, feedback submitted to restaurants
Order data	Drinks ordered through the in-app marketplace, order history
Device & technical data	IP address, device type, browser, app interaction data, cookies

2.2 From Restaurant Customers

Category	Examples
Business data	Restaurant name, address, branding assets, menu and pricing data
Staff account data	Names, email addresses, roles of staff using the dashboard
Billing data	Invoicing details, payment information (processed via our payment provider)
Supplier data	Drink assortment details provided by integrated beverage suppliers

3. How We Use Your Data

3.1 Internal use

We process personal data internally to:

- Generate personalized food and drink pairing recommendations;
- Operate, maintain, and secure the Service;
- Improve and train our recommendation engine and platform features;
- Provide customer and technical support;
- Conduct internal analytics, product research, and reporting, including aggregated demographic insights (e.g. age range and gender breakdowns of visitors) shared with restaurants and drink suppliers;
- Detect, prevent, and investigate fraud, abuse, or security incidents;
- Send service-related communications and, where you've opted in, marketing communications.

3.2 External use / sharing

We may share data externally as follows:

- **Restaurants** receive aggregated and/or anonymized insights about guest preferences, and any individual feedback a Guest chooses to send directly to that Restaurant;
- **Drink Suppliers** may receive aggregated data on pairing performance and product popularity across venues using their assortment;
- **Service providers** (hosting, analytics, payment processing, customer support tooling) process data on our behalf under data processing agreements, and only for the purposes we instruct;
- **Marketplace partners** receive order details when a Guest orders a drink through an integrated marketplace;
- **Authorities** where required by law, regulation, or legal process.

Individual (non-aggregated) Guest data is only shared externally with your consent, or where otherwise legally permitted. You can withdraw consent for optional sharing (e.g. feedback to a specific restaurant) at any time in your account settings.

We do not sell personal data to third parties.

3.3 Marketing offers from Restaurants & Drink Platforms

With your separate, explicit consent, we may share your contact details and relevant preferences with:

- **Restaurants you have visited** through the Service, so they can send you personalized offers or promotions; and/or
- **Drink platforms and beverage suppliers** partnered with Sommi, so they can send you offers related to drinks you've rated, favorited, or ordered.

This consent is optional, separate from your core account and service communications, and can be managed at a granular level (e.g. restaurant offers on/off, drink platform offers on/off) in your account settings. You can withdraw this consent at any time, and doing so will not affect your ability to use the core Service. We do not send third-party marketing offers to guests who have not explicitly opted in.

4. Legal Basis for Processing

We rely on the following legal bases under the GDPR for each processing purpose:

Purpose	Legal basis (GDPR)
Providing pairing recommendations & core Service	Performance of a contract
Product improvement & analytics	Legitimate interest
Aggregated demographic insights for restaurants/suppliers	Legitimate interest (data is aggregated/anonymized)
Marketing offers from restaurants & drink platforms	Consent (explicit opt-in, revocable at any time)
Marketing communications	Consent
Sharing individual feedback with restaurants	Consent
Fraud prevention & security	Legitimate interest / legal obligation
Invoicing & tax records	Legal obligation

5. Cookies & Tracking

We use cookies and similar technologies to keep you logged in, remember preferences, and understand how the Service is used. You can manage cookie preferences through your browser settings or our cookie banner. Full details of the cookies we use are set out in this section.

6. Data Retention

We retain personal data only as long as necessary for the purposes described in this Policy:

- Guest account and preference data — for as long as your account is active, plus 12 months after deletion for backup and legal purposes;
- Restaurant business and billing data — for the duration of the contract plus the statutory retention period required for financial records (typically 7 years in the Netherlands);
- Support communications — up to 24 months.

7. International Transfers

Where data is transferred outside the European Economic Area (e.g. via a cloud service provider), we ensure appropriate safeguards are in place, such as Standard Contractual Clauses approved by the European Commission.

8. Data Security

We use appropriate technical and organizational measures — including encryption in transit, access controls, and regular security reviews — to protect personal data against unauthorized access, loss, or misuse.

9. Your Rights

Under the GDPR, you have the right to:

- Access the personal data we hold about you;
- Correct inaccurate or incomplete data;
- Request deletion of your data ("right to be forgotten");
- Restrict or object to certain processing;
- Request a portable copy of your data;
- Withdraw consent at any time, without affecting past lawful processing — including turning off restaurant or drink platform marketing offers independently from your account communications;

- Lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) or your local supervisory authority.

To exercise these rights, contact us at contact@sommi.info.

10. Children's Privacy

The Service is not directed at individuals under 18, given its association with alcoholic beverage recommendations. We do not knowingly collect personal data from minors. If you believe a minor has provided us with personal data, please contact us so we can delete it.

11. Third-Party Links

The Service may contain links to third-party websites (e.g. marketplace or supplier pages). We are not responsible for the privacy practices of those third parties, and encourage you to review their policies separately.

12. Changes to This Policy

We may update this Privacy Policy from time to time. Material changes will be communicated via the Service or by email, and the "Last updated" date above will be revised accordingly.

13. Contact Us

For any questions about this Privacy Policy or how we handle your data, contact:

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