

GDPR - DATA PRIVACY & SECURITY POLICY

Hotel Euro Capital Brussels takes seriously the protection of data provided us by our guests and partners. In light of data protection laws – in particular, the European Union’s General Data Protection Regulation (“GDPR”) effective 25 May 2018 – we wanted to take this opportunity to provide our guests and partners with information about how we process the personal data you provide to our Hotel in the course of staying or working with us. This Data Privacy and Security Policy (**Privacy Policy**) sets out how we collect, store and handle your personal data.

Please note that the websites are not intended for children and minors and we do not knowingly solicit or collect Personal Data from children and minors. As a parent or legal guardian, please do not allow your children to submit Personal Data without your permission.

By submitting your personal data to us, you agree to the processing set out in this Privacy Policy. If there are any additional uses of your Personal Data, we will provide you with the ability to opt-in or out of those additional uses. This Privacy Policy contains general and technical details about the steps we take to respect your privacy concerns.

1. Personal Data we collect

Which data are we collection and from whom are we receiving it?

We collect the following data:

- **Personal data:** forename, surname, data of birth. We may also need to collect information as required by local laws such as passport or ID numbers, social security number.
- **Contact information:** place of residence (full address), phone number, e-mail address.
- **Visitor’s card data:** Personal data of the people travelling with you (name, date of birth, nationality).
- **Credit card info:** card number, name of the card holder, expiry date.
- **Security camera recordings** – in case you visit our hotels or other rooms which have security cameras and other systems for security reasons.
- **Data about personal preferences:** such as preferred room type.
- **Our correspondence:** if you contact us such as when you make enquiries or reservations, we may keep a record of that correspondence.
- **Your use of our website:** details of your visits to our website, mobile application and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

Usually we get all the data from you if you make your booking or enquiry through our website, via phone or e-mail. Your data might be forwarded to us by travel agencies, booking companies and other parties which are dealing with travel intermediation from whom you have been ordering our services from. In case we have not received your data directly from you, please read our Data Privacy Statement on our website.

If you provide us with Personal Data about other individuals (e.g. family members or travel companions, enterprise employees), regardless of whether you are travelling together, you must

inform such individuals that you have provided us with their details and let them know where they can find a copy of this Privacy Policy.

2. How we use Personal Data

We use your data to provide hospitality services ordered by you. In addition to accord the laws regulating our field of business and for other business objectives such as:

- **Personal data** – we need this information to identify you to ensure that we provide the service only for the person ordered the service and paid for the service.
- **Contact information** – we need this information to contact you. Above all we contact our guests via phone or e-mail, but in some cases the place of residence (full address) is needed. For example, when other contact methods do not work.
- **Credit card data**– we need this information in case we have the right to deduct a certain amount of money from your credit card. This usually happens when you have ordered extra services or we need to ask for compensation for the damages etc done.
- **Data about personal preferences** – If we ask this information or if you free willingly provide us with this info, we will use it to ensure the best hospitality service we can provide.
- **To customize our services and products to you:** to assure your future comfort and attention to your individual needs, we collect and store specific information about you, such as special requests during your stay. For example, if you are a regular guest at our hotel, we may store your Personal Data in our system to serve you better upon your return.
- **To comply with our legal obligations:** to comply with our legal obligations such as financial reporting requirements imposed by our auditors and government authorities, and to cooperate with law enforcement agencies, government authorities, regulators and/or the court in connection with proceedings or investigations anywhere in the world where we are compelled to do so.
- **To improve our services and products:** to assist in developing new services and products and to improve our existing services and products.
- **To ensure our website and mobile application function correctly:** to ensure that content from our website and mobile applications is presented in the most effective manner for you and for your computer.

3. We may share your Personal Data in the following ways.

- **Third party service providers who process Personal Data on our behalf to help us undertake the activities described in section 2 :** We may permit selected third parties such as service providers, agents, contractors to use your Personal Data for the purposes set out in section 2, including mail houses and e-mail service providers that we engage to send and disseminate promotional materials, data centre providers that host our servers and third party agents that process mailing, online bookings on our behalf. These parties are contractually prohibited from using Personal Data for any purpose other than for the purpose specified in their respective contracts, and will be subject to obligations to process Personal Data in compliance with the same safeguards that we deploy. We do not permit the sale of Personal Data to entities for any use unrelated to our Hotel operations or use of Personal Data by third parties for their own purposes.
- **Law enforcement agencies, government authorities, regulators and the court in order to comply with our legal obligations or to handle incidents/ claims:** We may disclose your Personal Data when required by relevant law or court order, or as requested by other government or law enforcement authorities to assist with proceedings or investigations. Where permitted, we will direct any such request to you or notify you before responding

unless to do so would prejudice the prevention or detection of a crime. This also applies when we have reason to believe that disclosing the Personal Data is necessary to obtain legal advice, to identify, investigate, protect, contact, or bring legal action against someone who may be causing interference with our guests, visitors, associates, rights or properties, or to others, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

4. How we transmit, protect and store Personal Data

- **Security of communications:** It is important to note that no security system or system of transmitting information over the Internet is guaranteed to be 100% secure by cyber crime. Please be aware of this when requesting information or sending forms to us online or by e-mail or from the "Contact Us" section. We recommend that you do not include any sensitive information including credit card details when submitting information online, using e-mail, facsimile or when using any public computers/public WIFI.
- **Security controls:** We maintain administrative, technical and physical safeguards designed to protect the personal data we maintain against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Despite such efforts, however, please note that no company can fully eliminate risks or guarantee the security of personal information. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of information about you at any time, and we bear no liability for uses or disclosures of personal information or other data arising in connection with theft of the information or other malicious actions.

We store certain customer information and reservation details in our Customer Information System and Reservation System on our subcontractor's secure servers. Our server resides behind firewalls to protect Personal Data collected from you against unauthorised or accidental access. Because laws applicable to personal information vary by country, our hotels or other business operations may put in place additional measures that vary depending on the applicable legal requirements.

5. Data Retention

Our retention periods are based on business needs and your Personal Data that is no longer needed is either irreversibly anonymised (and the anonymised information may be retained) or securely destroyed. We will retain your information for 3 months in our PMS software. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

6. Your rights

- **Opt-out of marketing:** You have the right to ask us not to process your Personal Data for marketing purposes at any time. You can exercise your right by sending us a mail at aj@ec-hotel.com.
- **Access:** you can ask us to provide you with further details on the use we make of your Personal Data and a copy of the Personal Data we hold about you.
- **Correction:** you can ask us to correct any inaccuracies in the Personal Data we hold about you.

- **Erasure:** you can ask us to delete your Personal Data if we no longer have a lawful ground for use.
- **Withdrawal of consent:** where processing is based on consent (e.g. marketing, or certain uses of Special Categories of Personal Data), you can withdraw your consent to processing and we will stop that particular processing;

7. Contacting Us

If you have any questions about this Privacy Policy or our processing of your Personal Data, please send us an email at: tsb@ec-hotel.com or aj@ec-hotel.com