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## **1. General information**

As part of our activities, Historic Hotels handles personal information.

More specifically, personal information is defined as all information about a identified or identifiable person.

The act of handling this information may be interpreted broadly. It involves processing personal data, occasionally done by automated systems with the purpose of collecting, fixing, ordering, saving, editing, searching, consulting, obtain by means of forwarding, spreading or other means of putting information at the disposal of others, protect, delete or destroy personal data.

Since Historic Hotels respects and values the safekeeping of personal data, this information will solely be processed in accordance with the European legislation 2016/679 of the European parliament and council of April 27<sup>th</sup>, 2016 regarding the protection of individuals and their personal data, as well as the free flow of those data of regulation 95/46/EG, also known as the **General Data Protection Regulation (GDPR)**, in combination with the Belgian federal laws.

The current privacy policy demands you to be clearly informed regarding the following:

- (a) The person responsible for processing your information
- (b) The purposes for which your information is used
- (c) The duration of the storage of your information
- (d) Your rights concerning the processing of your information
- (e) Our obligations concerning the processing of your information

## **2. The person responsible for processing your information**

The entities responsible for the processing of your information mentioned below are registered at the Kruispuntbank der Ondernemingen.

- Hotel Gravensteen BE
- Hotel Ghent River BE
- Hotel de Flandre BE
- Tower Hotel BE
- Monasterium PoortAckere BE 0464 249 720

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Every hotel takes this responsibility as a company with which you have contractual ties, directly or indirectly, as a customer or supplier, or whose website you visited.

### **3. The purposes for which your information is used**

How? The hotel collects information through agreements that are established directly or indirectly, voluntary provision of data by the people involved (possibly through contact forms), commercial actions in which you partake or by using our website or social media.

Wat? The data collected by the hotel are (electronical) identification data, financial data, personal specifications and video footage.

Why? Historic Hotels collects and processes these data which one or multiple fixed purposes, including the following: to fulfil established agreements, to obey the applicable legal obligations, for marketing purposes (to which you can object at any time), to improve the quality of our services, to counteract fraud and for managing your account on our website. The obtainment of personal information is necessary to fulfil these purposes.

### **4. The duration of the storage of your information**

Your personal information will be stored as long as needed to fulfil the purpose for which it was collected in the first place, in line with current legislation, and not longer than absolutely necessary or not longer than legally permitted. Video footage is stored for a maximum of 1 month, staff information for a maximum of 5 years after the employment ends, customer and supplier data can be kept for a maximum of 7 years. The current regulations do not detract from your rights as stated in the following paragraph (5).

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## 5. Your rights concerning the processing of your information

**Your right to revoke authorisation:** You can revoke the authorisation you granted us to store your personal data at any time. Naturally, this does not endanger the legitimacy of the use of your data from before the revocation.

**Your right to insight:** You may request the personal information Historic Hotels keeps about you at any time.

**Your right to correct:** You have the right to have any of your personal information corrected if false.

**Your right to delete:** You can ask Historic Hotels at any given time to erase your personal data from its systems in the following cases: the data are no longer necessary to fulfil the purposes they were collected for in the first place; the provision that was previously granted, got revoked; you object to the processing of your information in the ways that were previously stated; the information was handled incorrectly; the information has to be deleted by law; the information was obtained in relation to an offer of services from the information society to a child.

**Your right to restrict the processing:** In some cases, you also have the right to limit the processing of your information, particularly when the correctness of the information is questioned. The limitation will last for a period of time long enough for the person responsible to check the correctness of the information. It can also be limited when the processing is unauthorised and the person involved opposes the deletion of the information; if the hotel no longer needs the information for its original purposes, but the person involved needs it in relation to a legal claim in which the person involved objects to the processing of the data.

**Your right to transfer your information:** Under certain circumstances, you are allowed to obtain your data in structured, digital form and to transfer this to a different data-processing entity.

**Your right to object the use of your information:** You have the right to object to your personal data being used for marketing purposes.

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## **6. Our obligations concerning the processing of your information**

In terms of processing: Historic Hotels will always handle personal information in the following ways: In such manners that it is correct and transparent towards the person involved and used for fixed, clearly outlined purposes. The information will be correct and, if required, updated and will be guarded in such a way that the person involved will be no more identifiable than necessary for the purposes for which personal data is indispensable. All applicable technical or organisational measures will be taken to guarantee that the information is handled the way it is described above and that it is properly protected against unlawful processing or unintentional loss, destruction or damaging.

Legitimacy of the processing: The hotel is solely entitled to process personal data when one of the following conditions is fulfilled: You have explicitly given your permission to do so; the information is necessary to carry out an agreement where you are one of the parties involved (directly or indirectly); the processing of your data is part of a legal obligation of the hotel; the processing is necessary to protect your interests or those of a different individual; the processing is necessary to fulfil a task of public interest or for the practice of public authority; or the processing is necessary for the representation of the legitimate interests of the person responsible (unless the interests of the person involved are of greater importance).

The sharing of personal data: At every hotel, your personal information is only at the disposal of employees who need access to it in order to fulfil their function within the company. These employees are bound by strict in-house rules when it comes to personal information. In case the hotel would have to rely on third parties for the processing of personal data, it will only work together with those who guarantee to handle the information in a correct and lawful manner and value your rights as our client. Your personal data can be given to the following parties: accountants, banks or insurance companies, social security services, installers or managers of our electrical devices and its software (CCTV, cash desk, server, reservation tools and hotel software,...)

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## **7. In conclusion**

The current privacy policy may be adapted in the future. If any changes occur, you will be notified in time.

We have attempted to correctly inform you about our privacy policy and your rights as well as Historic Hotels' obligations towards you regarding the processing of personal information. If anything should be unclear or you have further questions, we are at your disposal for answers.

To contact us or to exercise one of your rights in relation to data protection, you can send an email to [GDPR@historichotelsbelgium.com](mailto:GDPR@historichotelsbelgium.com) or a letter to Hotel Monasterium PoortAckere, Oude Houtlei 56, 9000 Gent, Belgium Attn. the hotel manager. If you wish to exercise one of your rights, you should add a copy of your ID card or passport to your email/letter, this to verify your identity.

If you have any complaints and/or suggestions as to how we handle your personal information, we would like to hear about it. Historic Hotels values the protection of your rights. We also want you to know that you have the right to file a complaint with the regulatory authority, which is the "gegevensbeschermingsautoriteit" at the (Belgian) Chamber of Representatives at the 35 Drukpersstraat, 1000 Brussels.