# Hostel Uppelink & Kajaks Korenlei Data Privacy and Protection Policy

Kumulus bvba (referred to as 'HU&KK') (version 01/07/2019)

In line with the requirements of the EU's General Data Protection Regulation (GDPR).

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#### 1. Who Are We?

Hostel Uppelink & Kajaks Korenlei are a family owned hostel and kayak rental service located in the historical center of Ghent, Belgium. The name of our company is Kumulus byba (referred to as "HU&KK"). The contact details of our company are:

Kumulus bvba | Sint-Michielsplein 21 | 9000 Ghent | Belgium VAT: BE0844.125.969 | IBAN: BE73 0688 9456 6460 | BIC: GKCC BE BB +32 9 279 44 77 | info@hosteluppelink.com www.hosteluppelink.com | www.kajakskorenlei.be

#### 2. Whose Personal Data Do We Collect?

We collect personal data from:

Individuals making bookings;

Guests;

Visitors;

Anyone calling one of our phone numbers; and Business Contacts.

# 3. When Do We Collect Personal Data?

We collect personal data when you:

- Visit our Websites;
- Use one of our Web Apps;
- Make a booking online;
- Contact our hostel or kayak reception;
- · Provide payment details; or
- Use our wi-fi provided by GratWifi;

#### 4. Why Do We Collect Personal Data?

We collect personal data to:

- Receive & respond to enquiries; make, amend & administer room and kayaks bookings, process & store payment
  details, provide access to other products and services (such as meals) and to gather customer feedback which helps
  us to improve the services that we offer and to improve our customers' experience.
- Enable us to fulfil our contracts with our guests;
- Comply with legal requirements;
- Maintain the security and safety of our premises through CCTV; and
- Understand who we are accommodating at our property for your safety, for the safety or our other guests, visitors to our premises and for the safety of our staff and to protect our business.

#### 5. What Personal Data Do We Collect?

It is necessary, in order for us to confirm and manage a reservation, that we collect personal data. This will include:

- Your name
- Gender
- Date of Birth
- Nationality
- Telephone or mobile number
- Email address
- Identification data i.e. Passport. Driving License details
- Credit or debit card details
- Date of arrival and departure date

### 6. Direct Marketing

HU&KK wil not use your data for marketing or advertising purposes.

#### 7. Sharing Of Your Personal Data

Your personal data shall not be shared or provided without your consent to any third party except in the following situations: (a) data is necessary for provision of services – for example credit card details will be exchanged with your bank for your booking to be confirmed (b) HU&KK is obliged to provide the personal data on the basis of law or upon order by a public authority, or (c) it is specifically allowed by applicable legal regulations.

If we share your personal data according to (a), (b) or (c), we will use appropriate and proportionate safeguards and require that these greater or equal safeguards are implemented by the recipients (processor) who will be obliged to preserve your data privacy and protection rights.

# 8. How Long Do We Keep Personal Data?

Customer Data: For no more than 5 years or until such time as the purpose for which the data was collected is no longer valid whichever is the shorter;

Contact Data: We retain contact data for the period where it is in our legitimate interest to retain it to help us grow and improve our organisation. This includes HU&KK's suppliers, partners, contractors and contingent workers and prospective clients.

# 9. Your Rights

By submitting your information to us, you consent to the use of that information as set out in our full Privacy Policy. At any point while we are in possession of your personal data you have the following rights:

- You have the right to object to certain types of processing;
- You have the right to object to automated processing, including profiling;
- You have the right to request a copy of the information that we hold about you:
- You have the right to ask us to correct the data that we hold about you that is inaccurate or incomplete;
- In certain circumstances you can ask for the data we hold about you to be erased from our record;
- Where certain conditions apply you have the right to ask that we restrict the processing of your personal data;
- You may have the right to have the data we hold about you transferred to another organisation;
- Right to judicial review: if Kumulus byba refuses your request under rights of access. Note: we will always provide you with a reason as to why we have refused your rights request;
- You have the right to complain as outlined on the Belgian Data Protection Authority website (in Dutch, French and German only): <a href="https://www.gegevensbeschermingsautoriteit.be/verzoek-klacht-indienen">https://www.gegevensbeschermingsautoriteit.be/verzoek-klacht-indienen</a>

Note: Rights requests will be forwarded on to a third party if one is involved in the processing of your personal data.

#### 10. Data Security

HU&KK will make every effort to ensure that your personal data is stored securely.

The aim is to eliminate unauthorized or unlawful processing of your personal data, or accidental, unauthorized or unlawful access, use, transferring, processing, copying, transmitting, alteration, loss or damage of your personal data. Despite all efforts and meeting all rules set out by applicable legal regulations, it is not possible to guarantee the security of your data, if it is transferred or transmitted in an unsecured way.

For this reason, we have introduced adequate physical, technical and organizational measures and plans to protect and secure

all information collected by our services using

- Using Cryptography, where necessary;
- Using password protection, where necessary; and
- Restricting access to your personal data (i.e. access to your personal data is granted only to those employees or
  personnel for whom the access is indispensable for the purposes described in this document and in our full privacy
  policy).

We require that our partners, who provide supporting services that help us to store and otherwise process your personal data, apply the same high level of protection to your data.

Note: These measures do not remove your duty to secure your own personal data. You should regularly change your passwords and should never use predictable usernames and/or passwords, share your password with other persons, or grant access to your User account and/or disclose your personal data to other persons.

# 11. Changes Of Privacy Policy

HU&KK shall, from time to time, change and update the terms of this Privacy policy. These changes will be posted in a link at the url's: <a href="https://www.hosteluppelink.com">www.hosteluppelink.com</a> and <a href="https://www.hosteluppelink.com">www.kajakskorenlei.be</a>.

#### 12. Contact Details

Should you wish to know more about HU&KK, its protection of your privacy, or about this Privacy policy, you can contact HU&KK at office@hosteluppelink.com.

Please help HU&KK ensure that your data is up-to-date. If you believe that some of the data processed is incorrect, please contact us at <a href="https://original.org/nct/bull/nct/4/">office@hosteluppelink.com</a>.

# 13. Complaints

In the event that you wish to make a complaint about how your personal data is being processed by HU&KK (or third parties as described in above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority.

In the first instance please raise that complaint with us directly at office@hosteluppelink.com.

If you remain unhappy with the handling of your case, then you have the right to complain as outlined on the Belgian Data Protection Authority website (in Dutch, French and German only): https://www.gegevensbeschermingsautoriteit.be/verzoek-klacht-indienen.

# Hostel Uppelink & Kajaks Korenlei Cookie Policy

Kumulus bvba (referred to as 'HU&KK') (version 17/06/2019)

When you use our websites, we aim to make your experience engaging. In order to do this, we use cookies. Cookies are small text files which are sometimes downloaded on your computer or mobile device when you first visit our website so that we can remember who you are.

Usually, cookies contain two pieces of information: a site name and unique user ID. Cookies cannot be used alone to identify you, although they may be used to identify your IP address. Cookies help us and/or third party websites recognise your device the next time you visit and may remember details such as your username and preferences, analyse how the website is performing, or allow us to recommend content we believe is relevant to you.

Generally, cookies used on our websites may perform the following functions:

Essential: These temporary cookies only remain in the cookies folder of your browser until you leave our website.

**Performance**: These cookies are stored on your computer – they contain no personal information and are used to improve performance and assist in navigation. They remain in the cookies folder of your browser for longer than "Essential" cookies (dependent on your browser settings).

We use or allow third parties to serve cookies that fall into the categories above. We use Google Analytics to help us monitor our website traffic, and cookies may also be served via any of our subsidiary domains, online surveys, and online publications. We may also use third party cookies to help us with market research, revenue tracking and improving site functionality.

By using our websites, you agree that we can place these types of cookies on your device. We may change our 'Cookie Policy' from time to time. It is your responsibility to check the policy regularly. You will be deemed to have accepted any amendments to the policy if you continue to make use of the website after a change to 'Cookie Policy' has been made.

We have links to social networking websites (for example but not limited to: Facebook, Instagram) from Hostel Uppelink & Kajaks Korenlei. These websites may place cookies on your computer. We do not control how they use their cookies. We suggest you check their website to see how they are using cookies.

Our websites contains links to third party websites promoting their business and needs to our guests. HU&KK indemnifies itself against all data use on and reservations made via third party websites/agents. Please refer to their relevant privacy policy and terms and conditions.

For more information about cookies, visit www.aboutcookies.org which includes useful information on cookies and how to block cookies using different types of browser. Please note that by blocking or deleting cookies, you may not be able to take full advantage of our websites.