

THE STUDENT HOTEL PRIVACY POLICY

1. Introduction

The Student Hotel (TSH) operates activities in the business of hospitality, which includes offering hotel rooms, food and beverage facilities and co-working spaces. TSH is committed to protecting the privacy of all guests who interact with us at any moment during their TSH experience. We treat all the personal data of our guests with great care and we always act in accordance with, and in many cases exceed, the applicable national and international data protection legislation including the General Data Protection Regulation (GDPR).

This privacy statement is designed to fully inform you about our privacy practices including the collection of personal data, how we use it and the rights that exist for you to fully be in control of your data. We love to interact with our guests so that we can learn and continue to improve the services we offer to the TSH community, which means data is exchanged and used on many occasions including: when you use our mobile applications, visit our websites that are (co)owned or licensed by TSH, (together: the 'Websites'), make a reservation at TSH or visit one of our hotels, food & beverage locations ('The Commons/Pool'), co-working spaces ('TSH Collab'), the gym or any other property that belongs to TSH.

2. Who we are

This Privacy Statement applies to the processing of personal data by TSH Management B.V. and TSH Southern Europe S.L., including all members of its corporate family tree (affiliate companies) known collectively as The Student Hotel (TSH).

TSH Management B.V. is a limited liability company registered under the laws of the Netherlands with its statutory seat in Amsterdam, the Netherlands, and its office at Wibautstraat 129 (1091 GL), registered with the Dutch Chamber of Commerce under number 55241247. TSH Management B.V. is the legal entity that operates the Websites and acts as the primary data controller for all Northern European hotels..

TSH Southern Europe S.L. is a limited liability company registered under the laws of Spain with its statutory seat in Barcelona, Spain, and its office at Calle de Sanchi de Avila 22, 08018, registered under the number B 62647631. TSH Southern Europe Management

S.L. is the legal entity that manages and acts as the primary data controller for all Southern European hotels.

3. Changes

We may change this Privacy Policy to reflect changes at any time. The most recent version of the Privacy Policy is reflected by the version date located in the top left of this document. All updates and amendments are effective immediately upon notice, which we may give by posting a revised version of this Privacy Policy the Website. We encourage you to review this Privacy Policy often to stay informed of changes that may affect you, as your continued use of our services signifies your continuing awareness of this Privacy Policy.

4. What categories of personal data do we collect and why?

The type of data that TSH collects and what we do with it depends on how it was collected and the type of service you have signed up to enjoy. For example:

Browsing TSH websites

When you visit the a TSH website, we collect information anonymously about browsing activity when using the Websites. TSH uses various analytics services, such as:

- Google Analytics
- Google AdWords
- Hotjar
- Optimizely
- WVO

These services use cookies to help us analyze how you use the Websites.

We use this information to provide attractive offers, both on the website and on other websites you visit via online and third-party advertisements. We may also use this information for remarketing purposes to remind and assist you with potential bookings that were left incomplete.

Before you start using the website you will always have an opportunity to either accept or reject cookies. Your response to this question determines how much information you have consented to be tracked. By accepting our cookies policy, you increase our ability to advertise offers that are relevant and of genuine interest.

Subscribing using forms (online and offline)

When you subscribe to a newsletter, event, deal or classroom online or offline you will be requested to provide certain data including: name, e-mail, event you're interested in, profession, residence, city, gender, phone and date of birth.

We use this information to contact you about the newsletter, event or deal you have indicated you are interested in. We will only contact you when we believe there is a legitimate interest to do so based on the interest and information you have declared.

We may also use this information to perform other marketing activities regarding TSH more generally. We will only use the information submitted for marketing if you have provided consent for us to do so by ticking the opt-in tick box when submitting the information on the website. You can unsubscribe from marketing e-mails at any time by clicking the unsubscribe link contained in the e-mail.

When you join as a TSH Collab member

When you apply to join as a member of TSH Collab, you will provide us with your name, your (e-mail) address, your home address, and your payment details.

This information will be used for processing the membership application, billing purposes and to allow us to communicate with you about your membership, including sending surveys to understand how we can improve the service offered.

We will also use this information to send general marketing e-mails about other cool TSH news, events and deals but only if you have given us consent to do so by clicking the opt-in tick-box when joining as a member.

When you make a reservation at the Commons/Pool

When you make a reservation at the Commons or Pool, you will provide us with your name, e-mail address, reservation details and personal preferences.

This information will be used for processing the reservation and to communicate with you about the reservation.

We will also use this information to send general marketing e-mails about other cool TSH news, events and deals but only if you have given us consent to do so by clicking the opt-in tick-box when making the reservation.

When you make a reservation as a hotel guest or short stay guest

When you make a reservation as a hotel guest or a short stay guest at TSH, you will provide us with your name, your (e-mail) address, your home address, your stay preferences, the dates you are staying with us and your payment details.

This information will be used for processing the reservation, billing purposes and to allow us to communicate with you about your reservation, including sending surveys to understand how we can improve the service offered.

We will also use this information to send general marketing e-mails about other cool TSH news, events and deals but only if you have given us consent to do so by clicking the opt-in tick-box when making the booking.

When you make a reservation as a semester guest

When you make a reservation as a semester guest, you will provide us with your name, your home address, place of birth, nationality, ID/passport number, and a copy of the registration of your university. Furthermore, you must provide us the personal details of your parents and/or guarantor. These details will be used to process the reservation, billing purposes, communication about the reservation, in the event of an emergency and sending surveys to understand how we can improve.

As soon as you make a reservation as a semester guest you automatically receive a login code to enter the TSH LIFE App and/or our online portal.

When making use of our TSH LIFE App

When you make use of our TSH LIFE App, we collect the following types of personal data:

- your username, password and e-mail address when you register for an account;
- profile information that you provide for your user profile (e.g., first and last name, picture, phone number, interests);
- user content (e.g., photos, comments, and other materials) that you post within the TSH LIFE App;
- your preferred payment method. The payment intermediary will ask you to provide some payment data. We will not process your payment data and/or details;
- communications between you and TSH. For example, you may send us maintenance requests. We may send you service-related e-mails (e.g., account verification, changes/updates to features, technical and security notices). Note that you may not opt out of Service-related e-mails.

By using our application (the 'TSH LIFE App') you get access to our online community.

We use the data to get to know a bit more about you, your guests and what your demands are. This enables us to make your stay even more pleasant, so that you may one day decide to return to one of our hotels.

When attending TSH events and using the hotel facilities

When you attend events and make use of the TSH facilities you may be requested to provide various personal data for example using the photoboosts in the hotel lobbies.

This information will be used for the processing activity specified when giving the personal data. It may also be used to send general marketing emails about other cool TSH news, events and deals but only if you have given us consent to do so by clicking the opt-in tick-box when providing the data.

After your TSH experience:

After what we hope is only your first TSH experience we will continue to store all your personal data collected in a profile. Should you return to TSH in the future, we want to be able to offer the best possible service you can imagine, including the ability to customize

your stay based on your previous personal preferences. We will only do this to the extent that we believe we have a legitimate interest to do so which in every case will be to improve the service we can offer to you in the future.

The data collected will therefore be kept for as long as we believe you may return to TSH, which could be indefinitely or until you communicate your right to be deleted.

We will also continue to send you marketing e-mails to keep you updated if you have previously giving consent for us to do so and will continue to do so for as long as we believe the content is valid and of interest to you. You can of course unsubscribe anytime you like by following the link contained in the bottom of the email.

5. Legal grounds for the processing activities identified

Based on the contractual agreement

- a. To manage your booking through any of the channels provided to this effect and to process your registration as a TSH guest (Hotel, Collab or restaurant), and for the subsequent business relation with you, as well as
- b. Managing, maintaining and effectively controlling the relation resulting from having contracted the TSH goods or services.
- c. To proceed to charge the designated amounts in the event of a booking cancellation outside the established time frame, as appropriate.
- d. To manage guests stay at TSH, in addition to providing the services requested during their visit, which includes, among other aspects, preparation of the visit and dealing with any requests made during their stay. For this purpose, we may request data, such as, hotel room requests, organize directions and to prepare the appropriate food menus. This also includes invoicing and charging for services consumed during their stay.

Based on legal obligations

- a. Notify the public authorities or regulatory or government bodies in those cases where it is necessary to so under law, local by-laws or in compliance with regulatory requirements.

Based on TSH legitimate interests

- a. Carry out commercial actions and/or advertising communications through any medium including electronic or equivalent communications relating to goods or services like those contracted with the TSH.

b. Create profiles based on the personal data available to TSH to ascertain the goods and services most appropriate to your profile, thus maximizing their results and in this way offering you the best of any goods and services of interest to you.

c. To carry out customer satisfaction surveys with the goods and/or services you have contracted to assess your satisfaction so that TSH can improve its processes and services.

d. To manage, process and respond to any possible complaints or claims. To record your voice and/or image and save the telephone conversation and/or video having expressly informed you of this fact. It is in the TSH legitimate interests to maintain the quality of its service and to use the recordings, should it be necessary to protect its legal position in the event of any possible conflict.

Based on your explicit consent

a. Should you so authorize (typically using an opt-in tick box), TSH may offer you goods and services other than those that you have contracted via e-mail, as well as other TSH products that may interest you, even when this contractual relation has ended.

b. Should you so authorize on the cookies pop up, TSH may monitor browsing history on the website and use that information to advertise products/services that may be of interest to you.

6. Who has access to your personal data?

We handle your personal data discreetly and will process the personal data only for strictly our own purposes. We will never sell or give your personal data to third parties without explicit prior consent. We will only transfer your personal data to third parties if it is necessary for us to fulfill our contractual obligations towards you or when it is necessary to perform functions you have granted consent for us to do. The third parties we work with are bound by the same conditions toward you and your personal data as written in this privacy statement.

We automatically collect generated information for statistical purposes. This information tells us how well our Websites are functioning. This information may be provided to third parties, but only if this information cannot be traced back to you directly or indirectly.

7. Your rights

We want to make sure that you are fully in control of your personal data. You have multiple rights and we want to ensure they are respected. If you wish to exercise any of the rights listed below, please make your request by sending an e-mail to:

- privacy@thestudenthotel.com

30th August 2018

Please state clearly in the subject heading what type of request you are making including as much detail as you can to assist us complete your request as quickly as possible. We will complete your request within 4 weeks.

Right of access

If you want to know what personal data we have collected and/or processed from you, you can request TSH to provide an overview. We will provide you with an overview of your personal data that we collect and/or process.

Rectification

If you believe that the personal data that we process is incorrect, inaccurate or incomplete, you may ask us to change or remove such personal data.

Erasure ('Right to be forgotten')

If you want us to remove the personal data we have collected and/or processed from you, you can request TSH to erase your personal data.

Restriction

Instead of requesting erasure, you may also request us to restrict the way we are processing your personal data. Restriction can be requested i.e. in case the personal data is inaccurate, unlawful, or pending a decision of a complaint lodged by you. If you restrict us from processing, we will only further process your data with your consent.

Portability

If you want to transfer the processed personal data to another controller of your choice, you may request us to provide you with a copy of your personal data in a structured, commonly used, and machine-readable format.

Object

You have always the right to object against the processing of your personal data by TSH. If it concerns a processing activity that requires consent you are always entitled to remove your consent.

Limitations of your rights

When a data subject request is made TSH will as a standard policy provide this service free of charge, however in exceptional cases TSH reserves the right to charge a reasonable fee. Data subject requests will only be implemented after the individual making the request has proved their identity, which confirms that they are indeed the subject that the request concerns. This can be achieved by sending a copy of a passport from the e-mail account that used when signing up to a TSH service.

Finally, in certain situations TSH may be entitled to legally refuse requests. If TSH believe there are legitimate grounds that override the interest of the data subjects request, then TSH may reasonably refuse to fulfill the request. TSH will always justify in writing why that is the case.

30th August 2018

Right to contact the supervisory body

If you believe your data request is not being handled correctly you are entitled to contact the national data supervisory body. The appropriate authority in the Netherlands is:

Autoriteit Persoonsgegevens

Postbus 93374

2509 AJ DEN HAAG

8. How do we protect your personal data?

TSH takes all necessary technical and organizational measures to protect your personal data against loss or any form of unlawful use of any third party. A strictly limited number of people have access to your personal data, and access to your personal data is only granted when explicitly needed to provide our services to you. Additionally, TSH has adopted a "Security First" policy with all 3rd party vendors, software companies, internal staff and contractors, meaning we only select those that share our core beliefs on security and privacy, and take the safety and security of your personal data as seriously as we do.

9. Transfer of personal data to other countries

For many of our business purposes we use cloud-based services. Therefore, for technical and organizational reasons, it may be necessary that your personal data is transferred to servers located in the US, or to servers located in other countries outside of the European Economic Area. Since privacy protection regulations in these countries may not be of a sufficient level, we will ensure that your personal data will only be sent to parties and/or countries with an adequate level of personal data protection.

10. Links to other websites

The Websites may contain links to other websites we do not control. Therefore, we will not be liable for the content of these websites, nor for the processing of personal data that may occur on these websites.

11. Copyright and other rights of Intellectual Property Rights

The (intellectual) property rights relating to the content and design of the platforms and the Websites of TSH, including but not limited to text, data files, photos and (still and / or moving) images, audio material as well are owned by TSH or its licensors.

Reproduction (including processing) and / or disclosure of content and design of the platforms or the Websites of TSH is prohibited without the prior written consent of TSH.

12. Questions

In case you have any questions about this Privacy Policy, you may send an e-mail to privacy@thestudenthotel.com