THE STUDENT HOTEL

THE STUDENT HOTEL PRIVACY STATEMENT

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 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 it. 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, make a reservation 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 The Student Hotel Group s.a.r.l. and more specifically the relevant subsidiary that determines the particular purpose of the personal data they process. In practice the data controller will be either TSH Management B.V. or TSH Southern Europe S.L. 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 acts as the primary data controller for all Northern European subsidiaries.

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 subsidiaries.

3. Changes

We may change this Privacy Statement to reflect changes at any time. The most recent version of the Privacy Statement 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 Statement the Website. We encourage you to review this Privacy Statement often to stay informed of changes that may affect you, as your continued use of our services signifies your continuing awareness of this Privacy Statement.

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:

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Browsing TSH websites

If you visit a TSH website, we use cookies, which we store on your computer, phone or tablet. Cookies are small text files, and we use the information contained in these files for the essential functioning of our sites, non- essential functions to improve user experience, performance / analytics and advertising. TSH use various analytic services, such as:

- Google Analytics
- Google AdWords
- Hotjar
- Optimizely
- VWO
- Hotel Champ

These services use cookies and to a large extend concern anonymized data to help us analyze how you users use the websites so that TSH can improve the functionality and the content.

We may use this information to provide relevant 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.

Subscribing using forms (online and offline)

When you subscribe to a newsletter, event, deal, competition or classroom online or offline you will be requested to provide certain data, which may include but not limited to 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 relevant topic 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 most typically ticking the opt-in tick box when submitting the information on the form. 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 TSH material 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 restaurant

When you make a reservation at the Commons, you will provide us with your name, e-mail address, reservation details and dietary preferences / allergies.

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 TSH material 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 hotel booking 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 hotel booking, billing purposes and to allow us to communicate with you about your booking, 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 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 hotel booking as a semester guest

When you make a reservation as a semester guest, you may be required to provide TSH 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 ensuring that they are aware that such data will be shared. These details will be used to process the booking, billing purposes, communication about the reservation, in the event of an emergency and sending surveys to understand how we can improve the services offered.

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.

Within 3 weeks of check-in you are contractually obligated to provide TSH with evidence of your registration with local municipality (if applicable). The evidence may include your individual identification number.

When making using the TSH LIFE App

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

- we use cookies, which we store on your device. Cookies are small text files, and we use the information contained in these files for essential functions in the App and non-essential functions to improve user experience and perform analytics. Analytic services are provided by third parties including AppSee and involve only the processing of anonymized data, which generates generic data such as how many users have downloaded the app.
- 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 publicly within the TSHF 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).
- laundry transactions when using the App to pay for laundry services.
- when using the TSH bike sharing system TSH will process location data from the user's mobile device temporarily to ensure that the bike can only be initially unlocked within a permitted radius of the hotel and can only be officially returned within a permitted radius of the hotel. The functionality of the location data indirectly informs TSH that a user is at a hotel when the bike is initially unlocked and officially returned. TSH does not collect or process any location data from the user's device when the bike is in use. A record of time is kept confirming the time the bike was unlocked and returned to ensure the terms of use are respected. All data will be automatically overridden once the bike has been returned in accordance with the bike terms of use and a new user unlocks the bike.
- When using the TSH bike sharing system TSH will keep a record of where the bike is locked using the location of the bike lock (not the user's device), which will only be used if needing to retrieve a bike that has not been returned in accordance with the bike terms of use.

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 photobooths 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 TSH news, events and deals but only if you have given us consent to do so by giving consent to receive such information.

After your TSH experience

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

e. To ensure the bike is unlocked in the correct location and returned to the correct location and proceed to apply the relevant charges in accordance with the TSH Bike terms of use.

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.

b. Legally obligated by law to collect and process personal data (e.g. maintain a hotel guest night register)

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 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.

e. To send operational relevant information about the TSH product you have purchased or event you have attended.

Based on your explicit consent

a. Should you so authorize (typically using an opt-in tick box), TSH may send marketing material about goods and services other than those that you have contracted or subscribed. TSH may contact you about relevant good and services after a contractual relationship has ended.

b. Should you so authorize on the cookies banner, TSH may monitor cookies 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

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. Please confirm as a minimum:

- Type of TSH service you signed up for (Hotel, Collab or the Commons)
- Location
- Dates
- Supporting evidence to help identify the correct profile (e.g. booking confirmation)
- A copy of your ID to confirm the request initiator is the data subject concerned

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.

Right to contact the supervisory body

If you believe your data request is not being handled correctly you are entitled to contact the TSH lead 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 other countries outside of the European Economic Area. TSH have implemented internal processes to ensure that your personal data will only be sent to parties and/or countries with an adequate level of personal data protection.

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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. Questions

If you have any questions about this Privacy Statement, please email:

privacy@thestudenthotel.com