

# Privacy Statement

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## Introduction



We rate your privacy extremely highly. Accordingly, we adhere to all relevant legislation and regulation, such as the General Data Protection Act (hereafter referred to as the GDPR).

Your personal data is in safe, professional hands with us. This Privacy Statement outlines everything Roompot does with the information we learn about you.

The information in this Privacy Statement relates to guests visiting our Head Office in Goes.

This Privacy Statement applies to Roompot. This includes the following entities: Roompot Services B.V., Roompot Recreatie Beheer B.V..

If you have any further questions or would like to know exactly what data we hold about you, please contact Roompot. Our contact details are listed at the bottom of this Privacy Statement.

### Processes

Below you will find the processes that occur within our organisation. For each one we have listed the reasons for processing your personal data. The table below that shows the personal data we process. Occasionally, we forward your personal data on or third parties help us process your personal data. These third parties are also listed in the table.

## **Generic communication**

Purpose: Communication by Roompot with third parties and internal workforce communication

In this Privacy Statement we endeavour to specify as accurately as possible why, when and how Roompot communicates. However, certain (exceptional) cases may arise that are hard to readily categorise under one of the outlined processes. In such an instance, we apply the following personal data processing principles.

We process personal data based on our legitimate interest in conducting standard business operations.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Communication (Correspondence)	Legitimate interest	For as long as is necessary for the communication in question	Microsoft



Contact (Email address, Telephone number)	Legitimate interest	For as long as is necessary for the communication in question	Microsoft
Name (Full name)	Legitimate interest	For as long as is necessary for the communication in question	Microsoft

## Lobbipad

Purpose: To register visitors to the Head Office.

When visiting our Head Office, we ask you to register some details. We will then make sure your contact person knows you have arrived. It also allows us to know which persons are present, for example in the event of an emergency.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Corporate (Company name/employer)	Legitimate interest	Until your	Offix,
		departure	Microsoft ,
			SBeffect
Date & time (Date, Time)	Legitimate interest	Until your	Offix,
		departure	Microsoft ,
			SBeffect
Contact (Email address, Telephone	Legitimate interest	Until your	Offix,
number)		departure	Microsoft ,
			SBeffect
Mode of transport incl. use	Legitimate interest	Until your	Offix,
(Registration number)		departure	Microsoft ,
			SBeffect
Name (Full name)	Legitimate interest	Until your	Offix,
		departure	Microsoft ,
			SBeffect

## CCTV



Purpose: CCTV at Head Office and the parks.

To ensure the safety of guests, personal property and our employees, CCTV is in operation in various locations. In highly exceptional cases temporarily concealed CCTV is also deployed. We only do so if no other option is available to us.

The exact retention period of security footage varies per location, yet is always less than 14 days.

Roompot is acutely aware that the filming of guests and employees comprises a significant infringement of privacy. That is why we handle the footage with extreme care and only film where necessary.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Photo & video (Security footage)	Legitimate interest	7 days	SBeffect, HS Security

## Management info

Purpose: Gaining insight into various Roompot activities for the improvement of the organisation and its service provision.

When formulating management information we always strive to only process required information. At no time will generated reports contain personal data.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Miscellaneous	Legitimate interest	7 years	Microsoft

## Recipients

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Above we listed the third parties that may potentially process your personal data too. We call these third parties 'recipients'. The table below lists all of these recipients. We have also stated what they do, plus their contact details. This way, you always know where your personal data is processed.

Sometimes a recipient processes your data outside of the EU. Rest assured, caveats are attached. The GDPR mandates us to take specific pre-determined steps in such an instance. Which, of course, we do. Below we have outlined the steps we take.

Recipient	Explanation	Recipient details



Microsoft	Microsoft 365	One Microsoft Place, South County Business Park,
		Leopardstown P521
		D18, Dublin
		Ireland
Offix	Head Office check-in	Lange Rekstraat 9
		9100, Sint-Niklaas
		Belgium
HS Security	Security	Mariapolderseweg 1
		4493 PH, Kamperland
		The Netherlands
SBeffect	ICT support	Amundsenweg 51-53
		4462 GP, Goes
		The Netherlands

## Amendments to this Privacy Statement

Roompot is a dynamic organisation. This may impact your personal data. For instance, we may start processing more of your personal data. Or for different purposes. However, we will always provide advance notice. We do so by making amendments to this Privacy Statement. Would you like to know when this Privacy Statement comes into effect? If you go right to the top of this statement, you'll see the start date listed.

## Your rights

If we process your personal data, you in turn are entitled to certain rights. Would you like to exercise these rights? If so, please get in touch with us, stating the right(s) you wish to exercise. Our contact details are listed at the bottom of this Privacy Statement.

Please clearly state your name. This will ensure we don't mistakenly adjust or delete data for another person. It may be the case that we aren't able or authorised to carry out your request. This depends on a number of issues. Which we will of course always notify you of. Would you like more information about your rights? If so, please visit the Dutch Data Protection Authority's website.

As a rule, we will carry out your request within 1 month. Occasionally this may unfortunately take longer. In this instance we will notify you and explain why we need more time.

You are entitled to the following rights:

#### Right of access



Would you like to know what kind of personal data Roompot processes about you? If so, you can submit a request to inspect this data. It's more than likely that we process different categories of your personal data. Or for several purposes. You may only wish to inspect some of the data that has been processed. Please therefore clearly state exactly what it is you wish to inspect.

#### **Right to rectification**

Has it transpired that your personal data held by Roompot is inaccurate, incomplete or irrelevant? If so, you can submit a request to have your data changed or supplemented. You can request rectification if your personal data is inaccurate, incomplete, irrelevant to the purpose for which it was collated or if we use your personal data in such a way that you believe contravenes legislation.

#### **Right to erasure**

You can ask us to erase your personal data. However, we would like to stress that we most likely won't be able or authorised to erase all your personal data. We will however always keep you notified in this instance.

#### Right to data portability

If Roompot processes your personal data you can exercise your right to data portability (transmission of personal data), as you have provided your consent to do so. Or to fulfil a contract with you. Please note: this only applies to data that we process digitally. So, not to hard copies.

#### Right to restrict processing

In certain circumstances an organisation may no longer use your personal data. Nor can it (yet) erase the data either. In such an instance the organisation must temporarily cease using your personal data. This is known as the right to restrict processing. You can ask us to limit the processing of your personal data.

#### **Right to object**

There are two situations in which you can ask Roompot to cease using your personal data. This is known as the right to object. Firstly, if we use your personal data for direct marketing purposes. Secondly, you can object against the use of your personal data based on your specific individual situation.

#### Right to revoke consent

Does Roompot process your personal data based on your consent? If so, you can revoke your consent at any given time. We will no longer process your personal data from that moment on. Unless (other) reasons for processing your personal data prevail.

## Technical and organisational provisions

Roompot.

We deem personal data security to be paramount. We take the following steps to safeguard your privacy:

#### **Technical provisions:**

- Access to your personal data is protected by a username (where feasible) and password, which is subject to a
  password policy.
- Access to personal data is protected by a username and a login token (where feasible).
- Upon receipt, personal data is saved in separate, encrypted folders.

#### Organisational provisions:

- Access to files is restricted via roles & rights.
- We take physical steps, such as access protection locks for the systems storing personal data.
- Periodic review of the effectiveness of our provisions.

## Submitting a complaint

If you wish to submit a complaint about the use of your personal data please email: privacy@roompot.nl. We address any complaint internally and communicate this further with you.

In addition, you have the right to file a complaint with the regulator at any time. In The Netherlands that would be the Dutch Data Protection Authority.

## **Contact details**

Should you have any questions or wish to know what personal data we hold about you, please get in touch with us. The contact details are listed below.

Roompot Schuverweg 2 4462 HK, Goes The Netherlands E-mail address: privacy@roompot.nl Telephone: +31 (0)88 0444 999