



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 all the ways in which Roompot processes the information we know about you.

The information listed in this Privacy Statement pertains to our (potential) accommodation owners.

This Privacy Statement applies to the whole Roompot Group, comprising the following entities: Roompot Recreatie Beheer B.V., Roompot Service B.V., Roompot Projects B.V. en Roompot Living B.V.

Should you have any further queries or wish to know the precise personal data we hold about you, please get in touch with 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 briefly listed the reasons for processing your personal data, as well as the kind of personal data involved. Also listed are the third parties that (may potentially) process your personal data too.

Signing up to Sales Day

Purpose: Signing up to a Sales Day at a holiday park.

If you are interested in attending a Sales Day, you can sign up to it. For this we process the following 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
Contact (Email address, Telephone number)	Legitimate interest	5 years After signing up to a Sales Day	Salesforce, Emakina, Estate agent
Address (Full address)	Legitimate interest	5 years After signing up to a Sales Day	Salesforce, Emakina, Estate agent
Name (Full name)	Legitimate interest	5 years After signing up to a Sales Day	Salesforce, Emakina, Estate agent

Online reservation of a plot



Purpose: Interested parties reserving a plot on a new build project.

Our online system provides interested parties with the means to reserve a plot. Some of your personal data is required to effectively process this.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Contact (Email address, Telephone number)	Contract fulfilment	2 years	Salesforce, Estate agent, Recranet, Microsoft
Gender (Preferred gender pronouns)	Contract fulfilment	2 years	Salesforce, Estate agent, Recranet, Microsoft
Property/accommodation (Plot number)	Contract fulfilment	2 years	Salesforce, Estate agent, Recranet, Microsoft
Address (Full address)	Contract fulfilment	2 years	Salesforce, Estate agent, Recranet, Microsoft
Name (Full name)	Contract fulfilment	2 years	Salesforce, Estate agent, Recranet, Microsoft

Personal consultation

Purpose: Contacting interested parties to make an appointment to discuss investment in a holiday home.

We aim to help you as best we can in your accommodation purchase. For instance, we do so by holding a personal consultation. For this we process the following 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
Name (Surname)	Legitimate interest	5 years	Salesforce, Emakina
Contact (Email address, Telephone number)	Legitimate interest	5 years	Salesforce, Emakina

Drawing up the purchase contract



Purpose: Drawing up and signing the purchase contract for an accommodation on a holiday park.

We draw up a purchase contract for accommodation transactions. On the whole, these purchase contracts are digitally signed.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Contract/agreement (Contractual parties, contractual arrangements, Type of contract)	Contract fulfilment	7 years	Adobe, Salesforce
Signing (Digital signature, IP address, Initial, Time of Signature, Time zone)	Contract fulfilment	7 years	Adobe, Salesforce
Contact (Email address, Telephone number)	Contract fulfilment	7 years	Adobe, Salesforce
Gender (Preferred gender pronouns)	Contract fulfilment	7 years	Adobe, Salesforce
ID numbers (Client number)	Contract fulfilment	7 years	Adobe, Salesforce
Address (Full address)	Contract fulfilment	7 years	Adobe, Salesforce
Name (Full name)	Contract fulfilment	7 years	Adobe, Salesforce
Gender (Preferred gender pronouns)	Contract fulfilment	7 years	Adform, Salesforce
Signing (Initial)	Contract fulfilment	7 years	Adform, Salesforce

Anti-Money Laundering & Anti-Terrorism Financing Act

Purpose: Complying with the Anti-Money Laundering & Anti-Terrorism Financing Act to counteract money laundering and the financing of terrorism.

We need to process the following personal data for the purpose of carrying out client investigations. We process this data pursuant to the statutory obligation arising from the Anti-Money Laundering & Anti-Terrorism Financing Act.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
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Property/accommodation (Purchase date, Purchase price, Accommodation, Financing yes/no, Rental yes/no, Sale price, Asking price)	Statutory obligation	5 years At the end of the business relationship	Microsoft
Proof of ID (Restricted copy)	Statutory obligation	5 years At the end of the business relationship	Microsoft, DocuSign
Commercial (Company name/employer, Occupation/specialism, Decision-making authority, Board member/shareholder, Position/role, Chamber of Commerce number, Chamber of Commerce certificate, Organisation chart, PEP yes/no, UBO (nature of interest), UBO yes/no)	Statutory obligation	5 years At the end of the business relationship	Microsoft
Financial (Assets (incl. source), Other relevant information)	Statutory obligation	5 years At the end of the business relationship	Microsoft
Address (Full address)	Statutory obligation	5 years At the end of the business relationship	Microsoft
Name (Full name)	Statutory obligation	5 years At the end of the business relationship	Microsoft

Roompot Living Web Shop

Purpose: Processing owner orders via the Roompot Living website.

You can place orders via the Roompot Living website. Some of your personal data is required to effectively process this. For more information, please see below.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Order (Order date, Order number, Products)	Contract fulfilment	7 years	Exact Holding B.V., Magento/Storefront

Financial (IBAN)	Contract fulfilment	7 years	Exact Holding B.V., Magento/Storefront
Address (Full address)	Contract fulfilment	7 years	Exact Holding B.V., Magento/Storefront
Name (Full name)	Contract fulfilment	7 years	Exact Holding B.V., Magento/Storefront

Owner administration

Purpose: managing accommodation owned by external parties, whereby Roompot also takes care of the rental optionally (and sometimes mandatory).

Once you become the owner of an accommodation you are included in our owner database. This ensures effective administration on our part, such as maintenance and periodic invoicing. More information is listed further on in this Privacy Statement.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Home/accommodation (Accommodation, Unit number)	Contract fulfilment	7 years At the end of the business relationship	Maxxton, Adobe, Microsoft , Belastingdienst
Identification numbers (BSN, CoC number)	Statutory obligation	7 years At the end of the business relationship	Maxxton, Microsoft , Belastingdienst
Tax information (VAT number)	Statutory obligation	7 years At the end of the business relationship	Maxxton, Adobe, Microsoft , Belastingdienst
Signing (Digital signature)	Contract fulfilment	7 years At the end of the business relationship	Maxxton, Adobe, Microsoft
Contact (Email address, Telephone number)	Contract fulfilment	7 years At the end of the business relationship	Maxxton, Adobe, Microsoft
Tax information (Tax identification number)	Statutory obligation	7 years At the end of the	Maxxton, Microsoft , Tax Office

		business relationship	
Age (Date of birth)	Statutory obligation	7 years At the end of the business relationship	Maxxton, Microsoft , Tax Office
Background (Place of birth)	Statutory obligation	7 years At the end of the business relationship	Maxxton, Microsoft , Tax Office
Signing (Signature)	Contract fulfilment	7 years At the end of the business relationship	Maxxton, Microsoft
Financial (IBAN)	Contract fulfilment	7 years At the end of the business relationship	Maxxton, Adobe, Microsoft , Tax Office
Contract/agreement (Agreement type)	Contract fulfilment	7 years At the end of the business relationship	Maxxton, Adobe, Microsoft
Home/accommodation (Letting yes/no, Letting period)	Contract fulfilment	7 years At the end of the business relationship	Maxxton, Adobe, Microsoft
Address (Full address)	Contract fulfilment	7 years At the end of the business relationship	Maxxton, Adobe, Microsoft , Tax Office
Name (Full name)	Contract fulfilment	7 years At the end of the business relationship	Maxxton, Adobe, Microsoft , Tax Office

Owner newsletter

Purpose: Sending newsletters to owners that include practical information and service messages.

Vital is that we keep owners up to speed of certain developments happening within Roompot or matters occurring on the park where your accommodation is located. As such, Roompot enjoys a legitimate interest in sending you these newsletters.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Property/accommodation (Accommodation)	Legitimate interest	Having unsubscribed	Salesforce, Maxxton
Owner (Active yes/no)	Legitimate interest	Having unsubscribed	Salesforce, Maxxton
Contact (Email address)	Legitimate interest	Having unsubscribed	Salesforce, Maxxton
Reading & browsing behaviour (Reading behaviour)	Legitimate interest	Having unsubscribed	Salesforce
Booking (Resort)	Legitimate interest	Having unsubscribed	Salesforce, Maxxton
Name (Full name)	Legitimate interest	Having unsubscribed	Salesforce, Maxxton

Maintenance

Purpose: Inventorying the condition of the accommodations and providing required maintenance.

We deem it paramount that your accommodation is and stays in optimal condition. To achieve this we periodically check the state of repair of your accommodation. We then, in consultation, decide upon any action needed.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Contact (Email address)	Contract fulfilment	7 years	Maxxton
Name (Full name)	Contract fulfilment	7 years	Maxxton
Jobs (Jobs undertaken, Job timing)	Contract fulfilment	7 years	Maxxton

Property/accommodation (State of repair, Rental yes/no, Inspection report)	Contract fulfilment	7 years	Maxxton
Owner (Property, Maintenance job costings)	Contract fulfilment	7 years	Maxxton

Owner credit control

Purpose: Sending invoices to and recovering sums from owners.

We will send you various invoices, pursuant to your owner contract signed with Roompot. These invoices, e.g., cover utility payments, municipal taxes etc.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Financial (Owner taxes, Credit control phase, Outstanding balance)	Contract fulfilment	7 years Having closed the file	Maxxton, Microsoft, Debt collectors
Contact (Email address)	Contract fulfilment	7 years Having closed the file	Maxxton, Microsoft, Debt collectors
Communication (Minutes)	Contract fulfilment	7 years Having closed the file	Maxxton, Microsoft, Debt collectors
Owner (Property)	Contract fulfilment	7 years Having closed the file	Maxxton, Microsoft, Debt collectors

Owner invoicing

Purpose: Drawing up invoices for owners, resellers and caretakers.

To formulate, send and pay periodic invoices relating to, e.g., the rental of your accommodation, we process the following 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
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Booking	Contract fulfilment	7 years	Maxxton
Financial (BIC/SWIFT, IBAN)	Contract fulfilment	7 years	Maxxton, Rabobank, ABN Amro
Financial (VAT number)	Contract fulfilment	7 years	Maxxton
Contact (Email address)	Contract fulfilment	7 years	Maxxton
Address (Full address)	Contract fulfilment	7 years	Maxxton
Name (Full name)	Contract fulfilment	7 years	Maxxton

Own accommodation booking

Purpose: Helping owners book their own accommodation.

The contract we have signed with you also covers agreements about booking your own accommodation. To facilitate this, we process various personal data about you and your travel group.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Booking (Arrival date, Number of nights, Travel group (number/age), Departure date)	Contract fulfilment	7 years	Maxxton
Contract/agreement (Contractual arrangements)	Contract fulfilment	7 years	Maxxton
Owner (Owner yes/no, Property)	Contract fulfilment	7 years	Maxxton
Contact (Email address)	Contract fulfilment	7 years	Maxxton
Address (Full address)	Contract fulfilment	7 years	Maxxton
Name (Full name)	Contract fulfilment	7 years	Maxxton

Website contact form



Purpose: Enabling interested parties to initiate contact via the contact form on the Roompot Real Estate website.

Have a question for us? If so, just give us a call or send an email. You can also use the contact form on our website. Below we have listed the personal data we process in that regard.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Contact (Email address, Telephone number)	Legitimate interest	5 years Having contacted us	Salesforce, Emakina
Property/accommodation (Interest)	Legitimate interest	5 years Having contacted us	Salesforce, Emakina
Address (Full address)	Legitimate interest	5 years Having contacted us	Salesforce, Emakina
Name (Full name)	Legitimate interest	5 years Having contacted us	Salesforce, Emakina

Roompot Real Estate newsletters and emails

Purpose: E-mailing holiday home owners and people who have subscribed to the newsletter.

We like to inform existing owners and other interested parties about new projects coming up for sale. Below we have listed the personal data we process in that regard. Within this context, Roompot's 'legitimate interest' comes into play with existing owners. Other interested parties have provided their consent for this.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Owner (Owner yes/no)	Legitimate interest	2 years At the end of the business relationship	Emakina, Salesforce
Contact (Email address)	Legitimate interest	2 years At the end of the business relationship	Emakina, Salesforce
Reading & browsing behaviour (Reading behaviour)	Legitimate interest	2 years At the end of the business relationship	Emakina, Salesforce

Address (Full address)	Legitimate interest	2 years At the end of the business relationship	Emakina, Salesforce
Name (Full name)	Legitimate interest	2 years At the end of the business relationship	Emakina, Salesforce
Owner (Owner yes/no)	Consent	Up to moment of revoking consent	Emakina
Contact (Email address)	Consent	Up to moment of revoking consent	Emakina
Reading & browsing behaviour (Reading behaviour)	Consent	Up to moment of revoking consent	Emakina
Address (Full address)	Consent	Up to moment of revoking consent	Emakina
Name (Full name)	Consent	Up to moment of revoking consent	Emakina

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 adhere to the following guiding principles when processing personal data.

We process such data on the basis of our legitimate interest in carrying out standard business practices.

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	Microsoft

		communication in question	
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

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

For each process mentioned above we have listed the third parties who may be involved in the processing of your personal data. Below is an overview of these parties, including their role and contact details. In this way you always know where your personal data is being processed.

Some third parties may process your personal data outside of the EU. In these cases we always ensure the right (contractual) provisions are complied with, pursuant to the GDPR. One key component thereof is that we have "appropriate warranties" in place. For what these are per recipient, please read on.

Recipient	Explanation	Recipient details
Maxxton	Online reservation system provider	Kousteensedijk 5 4331 JE, Middelburg The Netherlands

		Outside the E.E.A. Warranties: Standard Contractual Clauses (India)
Microsoft	Microsoft 365	One Microsoft Place, South County Business Park, Leopardstown P521 D18, Dublin Ireland
Magento/Storefront	eCommerce software	Hoogoorddreef 54a 1101 BE, Amsterdam The Netherlands
Salesforce	CRM system	Mission Street 415 (Salesforce Tower 3rd Floor) CA94105, San Francisco United States
		Outside the E.E.A. Warranties: Standard Contractual Clauses (United States of America)
Emakina	Website administrator	Danzigerkade 4 1013 AP, Amsterdam The Netherlands
		Outside the E.E.A. Warranties: Binding company regulations
Estate agent	Facilitating real estate transactions	Depends on property location
Adobe	Document signing and Proof of ID verification	Europiazza, Hoogoorddreef 54a 1101 BE, Amsterdam The Netherlands
Recranet	Online reservation system provider	Lange Noordstraat 16 4331 CD, Middelburg The Netherlands
Adform	Online forms	See Adform website
Debt collectors		Depends on the debtor
Rabobank	Payment and Receipt	Croeselaan 18 3521 CB, Utrecht The Netherlands
ABN Amro	Payment and Receipt	Gustav Mahlerlaan 10 1082 PP, Amsterdam The Netherlands



Exact Holding B.V.	Administration software	Molengraaffsingel 23 2629 JD, Delft The Netherlands
DocuSign	Digital signing	See Adobe

Amendments to this Privacy Statement

When changes occur within our organisation or our process, this may impact the processing of your personal data. We will always communicate transparently with you in this regard. Where necessary, we will make amendments to this Privacy Statement. The start date of this Privacy Statement is listed at the top.

Your rights

If we process your personal data, you in turn are entitled to certain rights. You can exercise these by submitting a request, and stating which right(s) you are concerned about. 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. The legal basis underpins all the aforementioned rights, upon which we in turn base the processing of your personal data. For more information about your rights please visit the Dutch Data Protection Authority's website.

Moreover, in certain instances we may not be able to follow up on your request on legal grounds. For instance, when we are not authorised to do so by law or the supervisory body. Where possible, we will inform you of this when you submit your request.

In principle, we shall handle your request within 1 month. However, this timeframe may be extended in relation to specific data subject rights or the complexity of the request. We will always notify you of any extension to this timeframe.

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 right to inspect this data. It's more than likely that we process different categories of your personal data. You may wish to only 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

In some instances you can ask Roompot 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 be able to fulfil a contract with you. Please note: this only applies to data processed digitally by Roompot, 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 restrict 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



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.
- We only use secure connections (Secure Sockets Layer or SSL) that protect all the information between you and our website, when entering your personal data.

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 process submitted complaints in-house and communicate directly with you. Moreover, you are at all times entitled to submit your complaint to the supervisory body. 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
Schuiverweg 2
4462 HK, Goes
The Netherlands
E-mail address: privacy@roompot.nl
Telephone: +31 (0)88 0444 999