

# 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 wellness facilities.

This Privacy Statement applies to Roompot. This includes the following entities: This includes the following entities: Roompot Services B.V., Roompot Recreatie Beheer B.V. and the wellness facility you use.

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		Microsoft
		For as long as	
		is necessary	
		for the	
		communication	
		in question	



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

# Wellness online reservation

Purpose: Making an online reservation for a facility at one of the parks.

It is very easy to make an online reservation for all our facilities. 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
Reservation (Reservation date, Reservation number)	Contract fulfilment	6 months After visit	Dimmbizz
Contact (Email address)	Contract fulfilment	6 months After visit	Dimmbizz
Name (Full name)	Contract fulfilment	6 months After visit	Dimmbizz

# Wellness visit

Purpose: Visiting a wellness facility at various Roompot parks.

When you visit a wellness facility, 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
Wellness (Treatments/deal)	Contract fulfilment	7 years After visit	Dimmbizz
Hospitality	Contract fulfilment	Erased the same day	Upta
Date & time (Date)	Contract fulfilment	7 years After visit	Upta , Dimmbizz
Financial (IBAN)	Contract fulfilment	7 years After transaction	Ingenico , Upta
Identification numbers (Reservation number)	Contract fulfilment	7 years After visit	Dimmbizz
Name (Full name)	Contract fulfilment	7 years After visit	Dimmbizz

# Wellness subscription

Purpose: Taking out a wellness facility subscription.

You can take out a subscription for a wellness facility. We will then register your subscription and the number of visits you have left. Have you run out of credit? If so, you can renew the subscription, or we will stop it.

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	Dimmbizz
Wellness (Credit)	Contract fulfilment	7 years	Dimmbizz
Address (Full address)	Contract fulfilment	7 years	Dimmbizz
Name (Full name)	Contract fulfilment	7 years	Dimmbizz



Financial (IBAN)	Contract fulfilment	7 years	Upta , Ingenico

### Treatments, sunbed, etc.

Purpose: Providing safe treatment or providing use of a facility, such as the tanning bed.

Before treatment or use, it is important to consider what is appropriate and whether there are any particulars that should be taken into account. To avoid unexpected surprises. Any forms we ask you to complete are held on file for a short time only.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Age (Date of birth)	Legitimate interest	1 month	
Name (Full name)	Legitimate interest	1 month	
Signing (Signature)	Legitimate interest	1 month	
Wellness (Tanning advice ,Determination of sun exposure background,Skin type, Sun habits)	Legitimate interest	1 month	

# Guest contact over the phone

Purpose: Having telephonic contact with (potential) guests, e.g., answering queries and completing bookings.

When you call Roompot we process various data in order to provide you with the best possible service. For example, if you have a booking query, we will retrieve your booking details.

All phone calls are recorded, so we can evaluate and improve the quality of our service provision.

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	Maxxton, Salesforce, Gen25,



			Frontline, Genesys
Identification numbers (Reservation number)	Legitimate interest	5 years	Maxxton, Salesforce, Gen25, Frontline, Genesys
Communication (Phone call)	Legitimate interest	3 months	Frontline, Genesys
Name (Full name)	Legitimate interest	5 years	Maxxton, Salesforce, Gen25, Frontline, Genesys

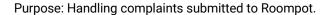
# Guest contact by email

Purpose: To maintain contact with (potential) guests via email.

You can always email us your query. We will respond as promptly and efficiently as possible. If your query concerns a booking we will pull up your booking details, in order to help you as best we can.

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	5 years	Maxxton, Microsoft, SBeffect, Salesforce, Gen25
Contact (Email address)	Legitimate interest	5 years	Maxxton, Microsoft, SBeffect, Salesforce, Gen25
Name (Full name)	Legitimate interest	5 years	Maxxton, Microsoft, SBeffect, Salesforce, Gen25

# **Complaints handling**





We do our utmost to ensure your stay at Roompot is the best it can be. Unfortunately, we sometimes fall short of the mark. You can always submit a complaint if you feel the need to do so. We will then put our heads together to try and find an appropriate solution.

Still feel the issue is unresolved? Please feel free to take further steps. For instance, you could approach the Disputes Committee. In such an instance we will usually provide your details to our lawyer, to help us further.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Complaints (Compensation)	Contract fulfilment	7 years	Microsoft, Salesforce, Gen25
Communication (Correspondence)	Legitimate interest	7 years	Microsoft, Salesforce, Gen25
Complaints (Complaint)	Legitimate interest	7 years	Maxxton, Salesforce, Gen25, Microsoft
Address (Full address)	Legitimate interest	7 years	Salesforce, Gen25
Name (Full name)	Legitimate interest	7 years	Microsoft, Salesforce, Gen25
Booking (Arrival date, Number of nights, Accommodation, Additional bookings, Booking date, Booking medium, Deposit, Reservation number, Resort, Departure date)	Legitimate interest	7 years	Microsoft, Salesforce, Gen25
Complaints (Compensation)	Contract fulfilment	7 years	Maxxton, Salesforce, Gen25, Microsoft
Communication (Correspondence)	Legitimate interest	7 years	Maxxton, Salesforce, Gen25, Microsoft
Financial (IBAN)	Contract fulfilment	7 years	Microsoft, Salesforce, Gen25

#### **Newsletters**



Purpose: Sending newsletter to guests and people subscribed to it.

Roompot periodically sends newsletters to guests and other interested parties. If you have made a booking with Roompot, we will send this newsletter based on our legitimate interest in informing our guests.

Otherwise, we will only send newsletters to people who have signed up for them.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Gender (Preferred gender pronouns)	Legitimate interest	5 years	Salesforce, Gen25
Reading & browsing behaviour (Click behaviour, Reading behaviour, Opening page/newsletter)	Legitimate interest	5 years	Salesforce, Gen25
Name (Full name)	Legitimate interest	5 years	Salesforce, Gen25

# Reviews and surveys

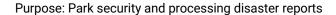
Purpose: Processing submitted guest reviews. Plus, sending and processing surveys that have been sent to guests.

We continuously strive to improve upon our guest satisfaction. As such, your input is crucial. That's why we send surveys and keep a close eye on reviews posted on other websites.

Sometimes we ask you if we can post a review on our own website. We will always seek your consent first though.

What kind of data do we process?	Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Survey/review	Legitimate interest	5 years	Customer Alliance, InSocial
Booking (Resort, Departure date)	Legitimate interest	5 years	Customer Alliance, InSocial
Name (Full name)	Legitimate interest	5 years	Customer Alliance, InSocial

## Security and on-park disasters





Our parks are monitored for your security, and ours. Reports and incidents are responded to rapidly and effectively. Formal warnings can also be issued. In exceptional cases we will ask a guest or travel group to leave the park. Is your stay at the park booked via your company? If so, we will also notify your employer of any formal warnings or expulsions.

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 (Accommodation, Resort)	Legitimate interest	Depends on the report/incident	Maxxton, Microsoft, HS Security
Corporate (Company name/employer)	Legitimate interest	Depends on the report/incident	Maxxton, HS Security
Incidents	Legitimate interest	Depends on the report/incident	HS Security, Microsoft
Booking (Reservation number)	Legitimate interest	Depends on the report/incident	Maxxton, HS Security
Name (Full name)	Legitimate interest	Depends on the report/incident	Maxxton, HS Security

#### **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 process this data?  we process this data?  for?	Stakeholders
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Photo & video (Security	Legitimate interest	7 days	SBeffect, HS
footage)			Security

#### Wellness blacklists

Purpose: To record guests who have displayed undesirable behaviour and have been denied access to the wellness facilities.

Roompot is committed to guest safety. Access to a facility may be denied as soon as a guest becomes a nuisance. A record is kept, to maintain denied access in the future. This may be temporary or permanent, depending on the nature of the incident.

Upon what grounds do we process this data?	How long do we retain this data for?	Stakeholders
Legitimate interest		Microsoft
	Depends on the	
	incident	
Legitimate interest		Microsoft
	Depends on the	
	incident	
Legitimate interest		Microsoft
	Depends on the	
	incident	
	Legitimate interest  Legitimate interest	Legitimate interest  Depends on the incident  Legitimate interest  Depends on the incident  Legitimate interest  Depends on the incident

# **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



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
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
Upta	Point of sale system	Korte Eeweg 11 4424 NA, Wemeldinge 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)
HS Security	Security	Mariapolderseweg 1
		4493 PH, Kamperland The Netherlands
SBeffect	ICT support	Amundsenweg 51-53
		4462 GP, Goes
		The Netherlands
Gen25	Salesforce implementation and	Gustav Mahlerlaan 350-B
	support	1082 ME, Amsterdam



Dimmbizz	Wellness reservation system	Dr A.F. Philipsstraat 13G
		4462 EW, Goes
		The Netherlands
Frontline	Telephony	Lange Dreef 15
		4131 NJ, Vlanen
		The Netherlands
InSocial	Feedback software	Phoenixstraat 58
		2611 AM, Delft
		The Netherlands
Ingenico	Payment Service Provider and	Neptunusstraat 41-63
	terminals	2132 JA, Hoofddorp
		The Netherlands
Customer	Feedback tools	CA Customer Alliance GmbH Ullsteinstr.
Alliance		130 Tower B
		12109, Berlin
		Germany
Genesys	Telephony	Prins Bernhardplein 200
		1097 JB, Amsterdam
		The Netherlands
		Outside the E.E.A.
		Warranties: Standard Contractual
		Clauses (United States of America)

# **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 be able 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

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.

# Roompot.

# **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