



# PRIVACY POLICY

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## 1 DEFINITIONS

*Personal information:* Information about an identifiable person, which can be: work or private email addresses, work or private mobile number, home address, personal credit card data, information on work history, etc. Information that cannot be linked to a specific person or which is public, is not considered to be personal information according to the General Data Protection Regulation (GDPR).

*3<sup>rd</sup> party or third party:* An organisation or person other than Twin Peaks Hospitality B.V., the employees or the client.

*Employee:* A person employed by Twin Peaks Hospitality B.V.

*Permission:* A voluntary agreement for the use, release and collection of personal information for the specific purposes announced in advance and issued by the person in question or his or her authorised representative.

*Disclose:* Making personal information available to a 3<sup>rd</sup> party.

## 2 PROCESSING PERSONAL DATA

Twin Peaks Hospitality B.V. or external processors will process your personal data to show the correct products and offer an optimal service. Messages may also be sent both for substantive purposes relating to the services (if permission has been obtained), and for promotional purposes.

Specifically, the processing of personal data can be applied, among other things:

- to obtain insight into a client's profile and to conclude agreements;
- to process data for marketing purposes;
- to meet statutory obligations;
- to deliver services;
- for communication;
- to improve products and services;
- to deal with clients' queries;
- safety and dispute settlement;
- to perform checks on creditors and debtors;
- for audits;
- to determine the general strategy and policy (through cross-sectoral analysis).

In the case of personnel policy, the following information is stored:

- contact details;
- CV;
- motivation for the vacancy;
- other matters to the extent required by law or with permission;
- special personal data exclusively via unambiguous consent.

This data serves the purpose of bringing together supply and demand in the workforce and possibly sending newsletters, vacancies and meeting legal obligations. Examples of special personal data are data about a person's health, race, political opinion, religious beliefs or criminal history. A passport photo is also a special personal detail. If you choose to include your passport photo or other special personal data in your CV, you give permission for saving it in the Twin Peaks Hospitality B.V. database.



Personal data will also be recorded in an internal app for staff. This data is accessible to other employees and aims to stimulate mutual involvement. The following information is recorded:

- name
- position
- department
- date of birth
- anniversary date

In order to process personal data, we also receive data from third parties.

### **3 MARKETING**

Twin Peaks Hospitality B.V. may use personal data for marketing purposes and to provide information on facilities and promotions. If such information is not, or no longer, appreciated, this can be adjusted by following the instructions in that message, sending an email to [info@tphcompany.com](mailto:info@tphcompany.com) or in writing (Wycker Brugstraat 2, 6221 EC Maastricht). This choice however doesn't apply to the obligatory communication relating to booking information.

Twin Peaks Hospitality B.V. does not send any personal data to third parties for commercial or idealistic purposes of these third parties.

### **4 NEWSLETTERS**

We send a maximum of 1 newsletter per month. You can unsubscribe at any time by clicking on 'unsubscribe' in the end of the e-mail. The newsletters contain information about Maastricht and actions from the company.

### **5 COOKIES**

Twin Peaks Hospitality B.V. makes use of cookies and scripts of Google to analyse the use of our website in anonymous form, so that the functionality and effectiveness can be adjusted.

A cookie is a text file stored by the browser on the hard disk of a computer, tablet or telephone such as the date and time of website visits, the type of browser, browser language, which pages and sub-pages were previously visited, and the duration of the user session. This information is stored for 38 months and is used for research, analyses and to optimise the website and make it more user-friendly.

Our cookies are only useful for Twin Peaks Hospitality B.V. and can only be used by websites of Twin Peaks Hospitality B.V. Cookies of third parties are not installed. A processor agreement has been concluded with Google for the processing of data and the use of Google Analytics. Data are encrypted and are not shared with Google or other parties.

- Cookies are anonymous and are not linked to personally identifiable information.
- Data are processed anonymously and are encrypted.
- Cookies have a limited life and are automatically deleted after being removed from the device.
- Data based on cookies are automatically deleted after 38 months.



Most web browsers accept cookies automatically, but normally the settings of the browser can be changed to prevent this. If cookies are undesired, look at the Help function of the internet browser to see how (all) cookies can be blocked. It is also possible to receive a signal before a cookie is stored. If the settings indicate that no more cookies are to be received, cookies received before this point in time can still be used; new cookies can no longer be used.

#### *Types of cookies*

The various cookies on websites of Twin Peaks Hospitality B.V. can be subdivided into the following categories:

- Functional cookies: like session and login cookies to collect session and login information.
- Anonymised Analytic cookies: to obtain information regarding the visits to our website, like numbers of visitors, popular pages and topics. In this way we can adjust our communication and information to the needs of our visitors. We cannot see who visits our sites or from which personal device the visit has taken place.
- Tracking Cookies: like advertising cookies that are intended to show relevant advertisements for remarketing. By using these cookies we may deduce your personal interests. Thus (other) organisations may show you targeted advertisements when you visit their website. Tracking cookies make profiling possible and treat categories of people differently when targeting advertisements. Tracking cookies usually process personal data.
- Specifically, we use the following cookies on our website:
  - Anonymised Google Analytics (analytical cookie)
  - Facebook (tracking cookie)
  - Google Adwords (tracking cookie)

The website can make use of content that is hosted on other sites and accessed on the site by means of certain codes (embedded content). Think of YouTube videos / These codes often use cookies. However, we have no control over what these third parties do with their cookies.

It is also possible that cookies are placed via our websites by others, of which we ourselves are not always aware. Do you encounter unforeseen cookies on our website that you cannot find in our overview? Let us know via [info@tphcompany.com](mailto:info@tphcompany.com). You can also contact the third party directly and ask which cookies they place, what the reason is, what the lifespan of the cookie is and how they have guaranteed your privacy.

## **6 TRACKING PIXELS**

A tracking pixel, also referred to as a 1 x 1 pixel, is a minuscule image that can be placed in an email, for example. This tracking pixel allows us to see whether an email has been opened. This information can be used to make recommendations and to optimise campaigns.

## **7 NOTIFICATION TO 3<sup>RD</sup> PARTIES**

We only share personal data with third parties after having obtained permission or if this is necessary to deliver an authorised service.

We share personal data after permission to complete a transaction, deliver a requested or authorised product or if we are required to do so by law. When data are requested based on



a statutory obligation, only the specifically requested information is disclosed. Twin Peaks Hospitality B.V. will take every precautionary measure to share data only when authorities have legitimate reasons to request this.

In addition, we share personal data with external parties to help protect and secure our systems and services and if these data are required for that purpose.

In such cases these companies are required to observe the privacy policy of Twin Peaks Hospitality B.V. and all security requirements related to these data. This also applies when Twin Peaks Hospitality B.V. transfers personal data across the national borders.

All these parties are not permitted to archive or use personal data for other purposes. In most cases, Twin Peaks Hospitality B.V. relies on the explicit permission given once an agreement has been concluded.

When payment data are provided, these are only shared with banks and other entities that process these payment data or extend other financial services.

The websites of Twin Peaks Hospitality B.V. may contain links to sites of third parties that do not fall under this privacy policy and therefore it is recommended to examine the privacy policy of the websites of these third parties. Twin Peaks Hospitality B.V. is fully committed to only place links to sites with strict privacy standards but is not responsible for privacy procedures of third parties.

## **8 WHAT ARE MY RIGHTS?**

Twin Peaks Hospitality B.V. adheres to the rules related to the General Data Protection Regulation and has the following rights:

- The right to view and amend collected personal data
- The right to withdraw permission to process data for future processing
- The right to have data removed
- The right to object against the collection of data
- The right to lodge a complaint with the data protection authority

When we process personal data we do this with permission and/or because it is necessary to deliver the products and services used, to meet the contractual and statutory obligations or for other legitimate reasons.

The accuracy of the personal information limits the possibility that inappropriate information can be used to take a decision on a person.

In the event of complaints or questions about privacy, our Privacy Officer (responsible for compliance with this policy) can be reached via [info@tphcompany.com](mailto:info@tphcompany.com), in writing (Wycker Brugstraat 2, 6221 EC Maastricht) or by telephone (+31(0)433254433). We will respond to the request or complaint within 30 days at the latest.

No costs are involved for reasonable access to personal data, unless it concerns copies or files, for example. In that event Twin Peaks Hospitality B.V. will inform you of any costs prior to the request. Twin Peaks Hospitality B.V. may need extra personal information to validate the right to the requested information. This extra information will only be used for validation and not for any other purpose.

In the event that access to the personal information is refused, Twin Peaks Hospitality B.V. will explain the reasons for this, except where this is prohibited by law. It is possible to contest this decision.



After the request for access of the personal information, Twin Peaks Hospitality B.V. will document this request.

The authority can be contacted via <https://autoriteitpersoonsgegevens.nl/>.

Each privacy-related complaint will be acknowledged, registered and investigated. The results of the investigation will be provided and if the complaint is found to be well-founded, appropriate measures will be taken, which can lead to, among other things, adjustments to the privacy policy and procedures.

If Twin Peaks Hospitality B.V. provides personal information to third party parties, Twin Peaks Hospitality B.V. will, if necessary, pass on any adjusted information to these third parties. In accordance with the procedures and the adopted policy, Twin Peaks Hospitality B.V. will update personal information on a regular basis when this is necessary for the purposes for which this information is collected.

## **9 SECURITY**

Twin Peaks Hospitality B.V. will make every effort to protect your personal data against unpermitted access, use, destruction, loss, forgery, or publication of these data, in the context of which we use various organisational, technical and physical security measures. In addition, Twin Peaks Hospitality B.V. weighs up the risks, the technical possibilities and the implementation costs.

Despite our safety measures we encourage clients to also put in place measures themselves against undesired use or publication.

## **10 STORAGE PERIOD**

Twin Peaks Hospitality B.V. only stores personal data for the maintenance of the agreement, marketing purposes, compliance with our statutory obligations, and dispute resolution. The need to store these data can vary per situation, as a result of which the actual storage periods may deviate. Twin Peaks Hospitality B.V. applies a number of criteria for these periods:

- Is there a statutory, contractual or other legitimate obligation to store data?
- Are the data provided by the client or which have been adjusted, data which one assumes are to remain stored?
- How long will it be necessary to store specific personal data for the operations?

The storage period is determined on the basis of the above questions. When there is no longer any reason to keep data stored, the data is removed from the systems.

## **11 DATA LEAK**

A data leak is involved when unauthorised persons have exposed personal information of our guests, staff, relations or other stakeholders to unlawful processing, disclosure or loss. This can be for example in the event of loss or theft of a laptop, telephone or USB stick, or a burglary in a database or system, such as for example email or other applications.

If a serious data leak occurs, Twin Peaks Hospitality B.V. is required to report this within 72 hours after it being established to the Dutch Data Protection Authority and possibly also to the people whose personal data have been leaked.



If there is a suspicion of a (possible) data leak or if such a leak has been established, we ask you to report this to us as soon as possible via [info@tphcompany.com](mailto:info@tphcompany.com). Please mention your name and telephone number in this email as well as a brief description of the data leak. When we receive your report, we will contact you for more information so as to take measures to limit the possible consequences. We will also determine the gravity and extent of the data leak and if necessary report it to the Dutch Data Protection Authority and any person(s) concerned.

## 12 AMENDMENTS

Twin Peaks Hospitality B.V. reserves the right to make amendments to the privacy statement. If there are any important changes in the way Twin Peaks Hospitality B.V. uses personal data, we will make this known before these come into effect.

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