

PROTOCOL CAMERA SUPERVISION easyHotels Benelux

This protocol applies for all easyHotels in the BeNeLux, which are managed by Xcentric Hotels B.V. (hereafter: “**easyHotel**”). Xcentric Hotels B.V. located at Lange Vijverberg 9, (2513AC) The Hague, the Netherlands, is responsible for the processing of the images.

Purpose of this protocol

The purpose of this protocol is to establish the manner in which easyHotel registers, gathers, uses and stores the images recorded by cameras that are or will be placed inside or surrounding its hotels.

Purpose of the camera supervision

EasyHotel applies camera supervision for the benefit of:

- i. Access monitoring of the hotels of easyHotel;
- ii. protecting property on the premises owned by easyHotel, its guests, its employees and visitors against theft;
- iii. Safeguarding the easyHotels, its guests and its employees against unauthorised access and other unwanted activities (e.g. criminal behaviour or behaviour against the house rules and general terms and conditions of easyHotel);
- iv. The registration and identification of unauthorised persons and persons which engage in unwanted activities;
- v. And everything that (in)directly relates to the above.

The use of camera images does not take place in a manner that is incompatible with the purposes set out above, unless this is necessary in the interest of the prevention, detection and prosecution of criminal offenses. The camera images may not be used to assess the performance of employees.

Responsible party

The executive management of easyHotel has appointed the Quality & Project Manager as the Responsible Party. The Responsible Party oversees the correct use of the camera recordings.

Location of the cameras

When placing the cameras, easyHotel takes the following into account:

- The cameras are placed in places where they are visible to those involved and only in places where camera surveillance has been proven necessary.
- EasyHotel does not use hidden cameras.
- The cameras are not aimed at public areas, unless this is unavoidable for the security of the goods and persons supervised by easyHotel.
- Cameras are not placed in places that are private, such as toilets, changing rooms and residences, or in places where mainly easyHotel employees are present, such as offices.
- Only fixed cameras are placed. No use is being made of mobile camera surveillance via, for example, drones.

Information provision

EasyHotel's policy is to inform data subjects in advance of the processing of personal data. The camera surveillance is announced by means of signs at the entrance of the building where the cameras are mounted and by means of this protocol for camera surveillance.

All employees will be informed, prior to the entry into force of the protocol. In addition, the protocol is published on the easyHotel website.

Legal basis for the camera surveillance

The legal basis of the CCTV is based on the fact that it is necessary to safeguard easyHotel's legitimate interest, being the security of visitors, employees and property.

It has been established that easyHotel has no other lesser invasive options available than CCTV to adequately secure its hotels and parking garages and that CCTV is part of a total package of measures.

Access to and security of the images

EasyHotel has taken adequate measures to protect the camera images. EasyHotel is responsible for appropriately securing the camera images against loss or any form of unlawful use. The camera images are protected with log-in codes so that only the Responsible Party and authorized persons acting under the Responsible Party's authority have access to the system and thus prevent abuse or unlawful access to recordings. By means of access control and logging it can be checked who has had access to the camera images and at what time.

Camera images may only be viewed after an incident has taken place or is suspected to have incurred. Incidents include, but are not limited to the following: theft, burglary, vandalism, fraud, damage to property, sabotage, use of violence, sex offenses, (other) crimes, serious violations (of the house rules), and events that put persons and property at risk. whether they have been otherwise harmed.

Access to the camera images in the event of (a suspicion of) an incident is limited to the Responsible Party following persons, acting under the authority of the Responsible Party:

- The Manager Operations of easyHotels in the Benelux;
- the General Counsel of easyHotels in the Benelux;
- The Hotel manager of the hotel where the alleged incident took place;
- The IT department of easyHotels in the Benelux;
- Members of the executive management of easyHotel.

In principle, no copies of recorded camera images are made. The images are stored for a maximum period of 28 days. The retention period or the copying of images can be deviated from if provision of these to third parties is necessary, on the basis of a legal obligation or if a malfunction or maintenance of camera registration equipment makes this necessary. After use by the third party, the Responsible Party must ensure that the copy made is immediately destroyed.

Provision to the police and the judiciary

If there is an (alleged) crime, easyHotel is entitled to provide the camera images to the police and/or the prosecutor's office. Whether it is really necessary to provide the camera images is assessed by the executive management team on the basis of an advice from the General Counsel and the Quality & Project Manager.

Please note that a claim by the competent authorities for the release of images on the basis of a court order is always adhered to up by easyHotel.

Retention period of the images

After recording, the camera images are kept for a maximum of twenty-eight days, unless there has been an incident and the camera images serve as evidence. A longer retention period may also be necessary if further investigation is required. The camera images are then retained for as long as this is necessary in the context of incidents that have occurred or as long as this is necessary for the further investigation.

Rights involved

Data subjects have the right to inspect images in which he can be recognized and to submit a request for the removal of the data, provided that the rights and liberties of others are not violated. A request can be addressed to Xcentric Hotels B.V., Lange Vijverberg 9, (2513 AC) The Hague, Attn: the General Counsel/Executive Management. A request for inspection or retrieval of a copy requires a clear indication of the period during which the person concerned suspects that he was filmed. EasyHotel will respond to the request of the person concerned within four weeks.

Complaints

Any complaints about the way in which easyHotel handles personal data can be reported to Xcentric Hotels B.V., Lange Vijverberg 9, (2513 AC), Attn: General Counsel/Executive Management, The Hague, the Netherlands.

Complaints can also be filed with the Dutch Data Protection Authority or the Belgian Data Protection Authority.