

## **PRIVACY NOTICE**

### **GUESTS AND WEBSITE USERS AND BUSINESS PARTNERS**

This Privacy Notice will inform you as to how STAY Management (“us”, “we” or “our”) collect, process, and share your personal data when you choose to purchase and/ or request one of our services, visit our website, and communicate with us.

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#### **1. WHO IS THE DATA CONTROLLER?**

The data controller for the processing described in this Privacy Notice is:

STAY Management A/S  
Fortkaj 5  
2150 Nordhavn, Denmark  
CVR 35851941

If you have any questions regarding this Privacy Notice, please contact us by email at [GDPR@staymanagement.dk](mailto:GDPR@staymanagement.dk).

If you visit our pages, communicate, or otherwise interact with us on social medias such as Facebook and Instagram or other platforms, please make sure to consult any specific privacy notice presented on such social medias or platforms. You should be aware that sometimes we may have a joint controllership with the publisher of the social media or platform in question.

#### **2. INFORMATION WE COLLECT AND HOW WE COLLECT IT**

In the following we will tell you which types of personal data we may collect about you and how we collect it. In section 3 we have in a table explained the purposes for which we process your personal data and the lawful basis we rely on.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- A. **Identification information** includes name, date of birth, nationality, passport or other government-issued identification data.
- B. **Contact information** includes e-mail, telephone number and address.
- C. **Health data** includes situations where a guest provides us with personal information on disabilities, medical conditions, or allergies.
- D. **Transaction data** includes details of products and services you have purchased from us and details about payments to and from you. We will also process your credit and debit card details or other payment data.

- E. **Social security number (CPR-no.)** in situations where it is a part of the provided passport.
- F. **Booking data** includes guest bookings, period of stay, stay preferences that we use to make your current and future stay and experience with us more enjoyable, important dates: birthdays, anniversaries, and other special occasions, employer details for business-related bookings, prior guest stays or interactions. In more limited circumstances we may also collect data about family members and companions.
- G. **CCTV data** includes recordings of your image and behavior (security cameras located in public areas, such as hallways and receptions, in our properties).

In most situations the information is collected directly from you when processing your booking and purchase of our services in our hotels or on our website or otherwise when you communicate with us. Some information may also be collected from third-party channels through which you book your stay with us.

### 3. THE PURPOSES AND THE LAWFUL BASIS

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- i. Where we need to perform a contract, we are about to enter into or have entered into with you cf. GDPR Article 6 (1)(b).
- ii. Where we need to comply with a legal or regulatory obligation cf. GDPR Article 6 (1)(c) or if necessary for the establishment, exercise or defense of a legal claim cf. GDPR Article 9 (2)(f).
- iii. Where it is necessary to protect your (or another person's) vital interests cf. GDPR Article 6 (1)(d) or Article 9 (2)(c).
- iv. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests cf. GDPR Article 6 (1)(f).

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p><b>Booking &amp; Guest Registration</b></p> <p>The activities associated with this purpose include, e.g.: registering you as a guest and facilitate your bookings of hotel accommodation and related services; engaging in prearrival communications (logistics, changes, preferences, etc.) and processing payments and deposits for our services and your bookings.</p>	<p>(A) Identification information</p> <p>(B) Contact information</p> <p>(C) Health data</p> <p>(D) Transaction data</p> <p>(F) Booking data</p>	<p>(i) Performance of a contract with you to facilitate your bookings</p> <p>(ii) Compliance with a legal obligation relating to financial transactions (Bookkeeping, Accounting and Tax)</p> <p>(iv) Legitimate interests for the individual booking, for example, honoring your preferences, as well as for any individual accompanying you</p>

<p><b>On-Site Reception &amp; Stay Service</b></p> <p>The activities associated with this purpose include, e.g.: facilitating check-in and check-out, including copying your passport or other government-issued identification; processing payments; providing and advice about the on-site services; making arrangements with third-party providers on your behalf, (such as arranging taxi); administering and facilitating access to Wi-Fi, TV and other connectivity services; facilitating breakfast, including taking into account any dietary, health restrictions or other personal needs expressed by you; housekeeping service, including preferences for special amenities expressed by you; handling customer requests, inquiries and complaints; and determining eligibility for age restricted goods and services (such as alcohol or in-room adult entertainment).</p>	<p>(A) Identification information</p> <p>(B) Contact information</p> <p>(C) Health data</p> <p>(D) Transaction data</p> <p>(E) Social security number</p> <p>(F) Booking data</p>	<p>(i) Performance of a contract with you to, such as processing your payments</p> <p>(ii) Copy of your passport or other government-issued identification is necessary to comply with the legal obligations under the Danish Aliens Consolidation Act</p> <p>(iv) Legitimate interests for the individual booking, for example, honoring your preferences, as well as for any individual accompanying you</p>
<p><b>Communications &amp; Marketing</b></p> <p>The activities associated with this purpose include, e.g.: enabling you to communicate with us on the website, in e-mail or via social medias.</p>	<p>(A) Identification information</p> <p>(B) Contact information</p>	<p>(iv) Necessary for our legitimate interest to communicate with you.</p>
<p><b>Conference &amp; Events</b></p> <p>The activities associated with this purpose include, e.g.: providing the capability for you to engage in conferences or events that you have signed up for, while also facilitating communication with us in relation to your participation.</p>	<p>(A) Identification information</p> <p>(B) Contact information</p>	<p>(iv) Necessary for our legitimate interest to communicate with you in relation to conferences or events.</p>
<p><b>Emergency &amp; Incident Responses</b></p> <p>The activities associated with this purpose include, e.g.: ensuring the security of on-site services; responding to, handling and documenting on-site accidents and medical and other emergencies, including facilitating inhouse doctor services; monitoring properties to ensure adequate incident prevention, response and</p>	<p>(A) Identification information</p> <p>(B) Contact information</p> <p>(C) Health data</p> <p>(G) CCTV data</p>	<p>(iv) Necessary for our legitimate interests to ensure a safe environment and for crime prevention and detection purposes</p> <p>(iii) Individuals' vital interests, such as contacting medical or emergency services</p> <p>(ii) Documenting on-site accidents is necessary in case we are met with a claim</p>

documentation, including CCTV at entrances and other areas to ensure the safety of our employees and guests, and for crime prevention, response and documentation; requesting assistance from emergency.		
<p><b>Legal &amp; Compliance</b></p> <p>The activities associated with this purpose include, e.g.: complying with applicable laws; responding to requests from public and government authorities; enforcing our terms and conditions; protecting our operations; protecting the rights, privacy, safety, or property of Stay Management, guests, visitors and other relevant individuals; and allowing us to pursue available legal remedies and limiting the damages that we may sustain.</p>	<p>(A) Identification information</p> <p>(B) Contact information</p> <p>(G) CCTV data</p>	<p>(ii) Compliance with a legal obligation</p> <p>(iv) Necessary for our legitimate interests to enforcing our terms and conditions</p> <p>(iv) Individuals' vital interests, such as contacting emergency services in case of disturbances and incidents involving guests</p>

To the extent that we have referred to our legitimate interest as the legal basis for the processing of personal data specified above, we have conducted a balancing test for those interests to ensure that our interest is not overridden by your interests or fundamental rights and freedoms.

#### 4. SHARING OF INFORMATION COLLECTED

We may disclose your personal data within the STAY Management group where required for the above specified purposes. We base this processing on our legitimate interest to transmit personal data within the STAY Management group for internal administrative purposes, such as for the purposes of using centralized IT systems and alignment of business operations and strategies.

We may disclose personal data to third parties:

- when it is necessary for the purposes listed in section 3.
- if you pay for a stay through our website, we may share relevant personal data with our payment service provider which acts as an independent data controller.
- we may assign your personal data, to any person or entity that acquires all or substantially all our business, stock or assets, or with whom we merge.
- when we believe in good faith that disclosure is necessary to establish or exercise our legal rights or defend against legal claims, protect your safety or the safety of others, investigate fraud, or respond to a government request.

We share information, including personal information, with our third-party service providers that we use to provide services to us and process your data on our behalf and under our instruction e.g., hosting of data and maintenance of IT-systems, payment processing, etc. These third-party service providers may have access to or process your personal information for the purpose of providing these services for us. We do not permit

our third-party service providers to use the personal information that we share with them for any other purpose than in connection with the services they provide to us.

## **5. TRANSFER TO THIRD COUNTRIES**

We will not transfer your personal data to recipients outside the EU/EEA unless we have ensured compliance with GDPR Chapter V.

Some of our third-party service providers are established outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. However, to ensure that your personal information receive an adequate level of protection we have ascertained that sufficient safety measures have been implemented to allow for the transfer, including where the European Commission have deemed the country to provide an adequate level of protection for personal data; or by use of specific contracts approved by the European Commission (“SCC’s”) which give personal data essentially equivalent protection as it has in Europe.

If you require further information about our current data processors established outside the EU and the safety measures in place to allow for the transfer of personal data, you can request it from us. Please send your request to us by email at [GDPR@staymanagement.dk](mailto:GDPR@staymanagement.dk).

## **6. DATA RETENTION**

We retain the personal information we collect where we have an ongoing legitimate need to do so. When we have no ongoing legitimate need to process your personal information, we will either delete or anonymize it.

When determining the retention period, we take into consideration various criteria, such as the type of services requested by or provided to you, mandatory retention periods provided by law and statute of limitation etc. Some of the personal information is retained to demonstrate the agreement we have/have had and for bookkeeping and tax purposes for 5 full fiscal years after the expiry of the year to which the transaction relates. The personal information may be retained for a longer period if we are legally obliged to do so, or if retention is necessary to establish, exercise or defend legal claims.

## **7. HOW TO EXERCISE YOUR DATA PROTECTION RIGHTS**

You have certain choices available to you when it comes to your personal information. Below is a summary of those choices, how to exercise them and any limitations.

Under certain circumstances, you have the right to:

- Request access to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.

- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party (also known as data portability).
- Where our processing is solely based on your specific consent you have the right to withdraw your consent at any time. Such withdrawal will not affect the lawfulness of processing based on your consent before its withdrawal.

If you wish to exercise any of the data protection rights that are available to you, please send your request to [GDPR@staymanagement.dk](mailto:GDPR@staymanagement.dk). and we will action your request in accordance with applicable data protection laws.

You have the right to complain to your local data protection authority if you are unhappy with our data protection practices. In Denmark you can lodge a complaint with Datatilsynet at <https://www.datatilsynet.dk/borger/klage/saadan-klager-du>.

## **8. CHANGES TO THIS PRIVACY NOTICE**

This Privacy Notice may be updated from time to time to reflect changing legal, regulatory, or operational requirements. We encourage you to periodically consult our website for the latest information on our privacy practices.