

# Privacy Statement

The Swan Hotel Collection, located at Prinsenhof 8 in 8000 Bruges, is of the opinion that it is important to protect your privacy. That is why we make every effort to process your Personal Data lawfully, honestly and transparently.

In collecting and processing your Personal Data, we duly respect the Belgian Personal Data protection legislation, as well as the General Data Protection Regulation (“GDPR”).

In this Privacy Statement, we explain what information we collect about you, what we use that information for and to whom we transfer such information. This Privacy Statement will also tell you what rights you have and how you can exercise them.

In brief, this Privacy Statement means that we will do the following with your Personal Data:

- ✓ use them only for the purposes agreed with you;
- ✓ not sell them;
- ✓ carefully secure them.

If you have any additional questions or if you have any suggestions or remarks regarding the content of this Privacy Statement, you can always contact us by email or by using the contact details stated below.

## 1. Scope

The companies of The Swan Hotel Collection act as the joint Personal Data Controllers as these are stated in this Privacy Statement.

The Swan Hotel Collection consists of the following companies:

- BVBA HOTEL ARAGON, with registered office at Naaldenstraat 22 in 8000 Bruges, registered with the Register for Legal Persons (R.L.P.) under number 0424.021.048;
- NV OUD HUIS DE PEELLAERT, with registered office at Hoogstraat 20 in 8000 Bruges, registered with the R.L.P. under number 0438.006.171;
- BVBA GRAND HOTEL CASSELBERGH, with registered office at Hoogstraat 6 in 8000 Bruges, registered with the R.L.P. under number 0465.532.890;



- **NV ROYAL CENTER**, with registered office at Prinsenhof 8 in 8000 Bruges, registered with the R.L.P. under number 0448.986.868;
- **NV HOTEL PRINSENHOF**, with registered office at Ontvangersstraat 9 in 8000 Bruges, registered with the R.L.P. under number 0428.449.691.

The Swan Hotel Collection provides its services through this group of companies by way of the following **hotels in Bruges**:

- Hotel Aragon;
- Hotel The Peellaert;
- Grand Hotel Casselbergh;
- Hotel Dukes' Palace; en
- Hotel Prinsenhof

This Privacy Statement applies to all services provided by The Swan Hotel Collection and, in general, to all the activities that we perform.

## 2. Definitions in this Privacy Statement

**“Personal Data”**: personal traceable data, which say something directly or indirectly about you as a person (name, address, telephone number, etc.);

**“Controller”**: the “owner” of certain Personal Data. This may be The Swan Hotel Collection as such or a third party;

**“Processor”**: the person who does the actual processing. This can be The Swan Hotel Collection (as service provider) or a third party who processes data of The Swan Hotel Collection.

## 3. What Personal Data do we process?

The Swan Hotel Collection processes your Personal Data pursuant to the fact that you use our services and/or because you personally provide us with such data.

The Swan Hotel Collection processes the Personal Data of natural persons with whom we have or have had a direct or indirect relationship or with whom we want to have such a relationship in the future.

These therefore concern Personal Data of its customers, of the contacts provided by its customers and suppliers, of the contacts at its potential customers, as well as the Personal Data of potential employees.

The Swan Hotel Collection can collect or obtain the following Personal Data from you:

- ✓ Identity details (name, address, email address, mobile phone number and E-ID details);
- ✓ Data regarding your communication with the company (visits and telephone conversations);
- ✓ Data regarding invoicing (VAT and bank account numbers);
- ✓ Data regarding your academic record and qualifications (provided within the framework of a job application);
- ✓ Complaints that you submit or requests that you address to us.
- ✓ Surveillance footage

#### 4. Why do we process your Personal Data?

The Swan Hotel Collection processes Personal Data for various purposes:

✓ To provide customers with our services

We process identity and contact details of our customers, principals, their employees and other valuable contacts so that we can execute the agreement with our customers. We also keep a record of when and how there is any communication with our customers.

We perform such processing for customer management purposes. Such processing is necessary to execute the agreement with our customer and it enables us to make a stay in our hotels most pleasant.

✓ Financial administration

We process identity and invoice data to be able to keep our own accounting and invoicing up to date. On the one hand, this processing falls under legitimate interest, namely the possibility to keep our administrative records up to date, and to obtain payment for the services we have rendered. On the other hand, The Swan Hotel Collection has a legal obligation to conduct accounting.

✓ Maintaining our customer relationship



The Swan Hotel Collection wants to maintain its customer relationships. That is why we use contact details to keep you informed of our activities or to invite you to events.

Sending such mailings to our customers falls under legitimate interest and, what is more, is also in our customers' interests. You will always be able to unsubscribe from such mailings.

✓ **Direct Marketing**

The Swan Hotel Collection processes prospective customers' identity and contact details for direct marketing purposes. Processing possible new customers' contact details forms part of our legitimate interest. If The Swan Hotel Collection dispatches/organises newsletters, surveys or competitions, such dispatch or organisation will always be based on the consent of the (possible) customer.

✓ **Recruitment purposes**

The Swan Hotel Collection collects Personal Data with a view to recruiting new employees. The legal grounds for such processing are, firstly, the consent of the candidate employee and, secondly, our legitimate interest to recruit the suitable candidate for a position.

✓ **Camera surveillance**

When you visit our buildings you can be filmed by our surveillance cameras in the context of the general security of The Swan Hotel Collection. This processing is part of our legitimate interest, which is always balanced against your interests.

## 5. Access by and transfer to third parties

The Swan Hotel Collection **does not sell your details** to third parties and transfers them solely and only if this is necessary to execute our agreement with you or to comply with a legal obligation. Such recipients of your Personal Data may only use this information to execute the agreement between you and us. They do not have the right to use the data for any other purposes.

If we engage third parties to process your data, then we ensure that such parties provide adequate guarantees regarding the protection of your Personal Data.

## 6. Duration of the processing

The Swan Hotel Collection **does not keep your Personal Data longer than is reasonably necessary** for the purposes stated in this Privacy Statement.

## 7. Confidentiality and security

The Swan Hotel Collection undertakes to make every possible effort to take all reasonable measures **to guarantee that your Personal Data are protected by way of technical security measures** so that, where possible, misuse, loss, unauthorised access, unwanted disclosure and unlawful alteration are prevented.

The Personal Data provided to The Swan Hotel Collection will continue to be stored at The Swan Hotel Collection or, where appropriate, at the Processor's on servers in Belgium or in the European Union.

## 8. Your rights

You have **various rights** regarding your Personal Data that we process. You can exercise these rights by contacting us by using the contact details stated in point 9.

Within the scope of our **identification obligation**, we can request you to provide us with a copy of your identity card.

We will respond to your request as quickly as possible, in any event, within 4 weeks.

### A. Right to perusal and correction

You can contact us if you want to know **which of your Personal Data** The Swan Hotel Collection processes and for what **purpose** it does so. You can also request that we **correct** any incorrect Personal Data or that we alter your data.

### B. Right to removal and restriction

You have the right to request us to **remove your Personal Data**. The Swan Hotel Collection may keep certain details after your request for removal, for example, because we have a statutory obligation to keep the details for a certain time.

If you have founded reasons to do so, you can request us to **restrict the processing of your Personal Data**. This may be because you dispute the correctness of your data, for example.



**THE SWAN**  
HOTEL COLLECTION

### C. Right to object

You can **object to the processing of your Personal Data** in a reasoned manner if such processing of your Personal Data is based on our legitimate interest or falls within the framework of fulfilling a task of public interest or official authority.

### D. Right to data portability

If we process your Personal Data on the basis of your (explicit) consent or within the framework of the execution of the agreement between you and us, then you can request us to **provide you with the Personal Data** that you gave us in a structured, commonly used and machine-readable format **or to transmit them to another controller**, on condition that the processing is carried out by automated means.

### E. Right to withdraw consent

If the processing of your Personal Data by The Swan Hotel Collection is based on your (explicit) consent, you have the right at all times **to withdraw such consent** again. However, the withdrawal of your consent does not compromise the lawfulness of the processing before you withdrew your consent.

### F. Right to submit complaints

You have the right to submit a complaint to the Belgian supervisory authority if you have a complaint regarding the use of your Personal Data by The Swan Hotel Collection.

#### **Data Protection Authority**

Drukpersstraat 35  
1000 Brussel  
Tel. 02/274.48.00  
Fax. 02/274.48.35  
contact@apd-gba.be

## 9. Contact details

#### **The Swan Hotel Collection**

8000 Brugge  
Prinsenhof 8  
+32 50 44 78 88  
info@theswanhotelcollection.com



## 10. Changes

We reserve the right to change this Privacy Statement from time to time. You will always find the latest version at [https://www.theswanhotelcollection.com/documenten/privacy\\_en.pdf](https://www.theswanhotelcollection.com/documenten/privacy_en.pdf).

*The most recent change to this Privacy Statement was made on 24 April 2019.*