

Privacy Policy BV Kumulus

This Privacy Policy is written in accordance with the provisions of Regulation 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC, known under the General Data Protection Regulation and subsequent national laws.

1. Who is BV Kumulus?

BV Kumulus (acting under its trademarks 'Hostel Uppelink' and 'Kajaks Korenlei'), is a limited liability company, incorporated under Belgian law, with offices at 9000 Ghent, Sint Michielsplein 21, and registered in the Crossroad Bank of Enterprises under number BE0844.125.969, hereinafter referred to as 'Kumulus'.

Kumulus is a family owned hostel and kayak rental service located in the historical center of Ghent, Belgium.

The contact details are:

Julie Franckaert and Rikkert Derre

BV Kumulus | Sint-Michielsplein 21 | 9000 Ghent | Belgium

VAT: BE0844.125.969 | IBAN: BE73 0688 9456 6460 | BIC: GKCC BE BB +32 9 279 44 77

www.hosteluppelink.com | www.kajakskorenlei.be | +32 9 279 44 77 | info@hosteluppelink.com

2. Whose Personal Data Do We Collect?

Kumulus collects personal data from: individuals making bookings, customers, guests, visitors, anyone calling one of our phone numbers and business contacts (e.g. suppliers).

3. When Do We Collect Personal Data?

Kumulus collects personal data when:

- visiting the websites www.hosteluppelink.com or www.kajakskorenlei.be
- making an online booking (Mews and Rentware Betterware Software)
- contacting the Hostel Uppelink or Kajaks Korenlei reception in person, by phone or by email
- providing payment details
- using our online key software
- using our wi-fi

4. Why Do We Collect Personal Data?

Kumulus collects personal data to execute the agreement and to comply with all legal requirements imposed on Kumulus.

Therefore Kumulus processes personal data to (i) respond to questions; (ii) to make, amend and administer room- and kayaks bookings, (iii) to process & store payment details, (iv) to provide access to other products and services (such as meals), (v) to gather customer feedback which helps to improve the services and the customers' experience, (vi) to maintain the security and safety of the Kumulus premises through CCTV, (vii) to comply with financial and fiscal requirements.

5. What Personal Data Do We Collect?

In order to confirm and manage a reservation, the following personal data might be collected by the online booking system and transferred to Kumulus: name, gender, date of birth, nationality, mobile number, e-mail address, identification number, identification data i.e. passport, driving license details, credit or debit card details, date of arrival and departure date.

Kumulus will only process the personal data that is necessary to execute the agreement and to comply with the legal requirements. Personal data which Kumulus receives from the online booking system, that Kumulus does not need to execute the agreement, will only be kept and archived by Kumulus, but not actively processed.

6. Direct Marketing and automated individual decision-making

Kumulus will not use personal data for marketing or advertising purposes, unless explicitly agreed to otherwise, nor will it process personal data with regard to automated individual decision making.

7. Sharing Of Personal Data

Kumulus will not share or provide your personal data without your consent with/to any third party (hereinafter the 'Processor') except if: (a) sharing personal data is necessary for the provision of services (e.g. credit card details will be exchanged with a bank in order to confirm bookings) or (b) Kumulus is obliged to provide the personal data prescribed by law or upon order made by a public authority.

If personal data is shared with third parties, Kumulus will apply appropriate and proportionate safeguards. Furthermore it will require that at least the same or equal safeguards are implemented by the Processor, whenever possible.

In order to execute the agreement, for online booking, for property management reasons, and execute online payments, personal data will be shared between Kumulus and MEWS and RENTWARE BETTERWARE SOFTWARE.

This Privacy Policy only applies to the websites owned by Kumulus (www.hosteluppelink.com and www.kajakskorenlei.be). If these websites contain links to other third party websites, the use of these third party websites are subject to their own privacy policies. Kumulus is not liable for the privacy policies and/or content of these websites. Kumulus therefore recommends to consult the privacy policies of these other third party websites.

8. How Long does Kumulus keep Personal Data?

Personal data of a customer will be kept for seven (7) years or until such time as the purpose for which the data was collected is no longer valid whichever is the shorter.

Emails will be collected for a period of five (5) years.

CCTV footage will be retained for a period of six (6) weeks.

Kumulus retains contact data for the period where it is in our legitimate interest to retain it to help Kumulus grow and improve. This includes Kumulus' suppliers, partners, contractors, contingent workers and prospective clients.

9. Rights of the data subject

By submitting personal data to Kumulus, the data subject (= you) consents to the processing of personal data according to the terms of this Privacy Policy.

At any point while Kumulus processes personal data the data subject has the following rights with regard to its personal data:

- The right to object to certain types of processing;
- The right to request a copy of the information that is held by Kumulus;
- The right to ask Kumulus to correct inaccurate, false or incomplete personal data;
- The right to ask for the personal data to be erased from Kumulus' records (where applicable);
- The right to ask restriction of the processing of personal data;
- The right to have the data transferred to another organisation;
- The right to withdraw consent at any time with regard to the processing of personal data.

In case the data subject withdraws his or her consent, this shall not affect the lawfulness of the processing based on the consent before its withdrawal or the processing of the personal data not subject to such consent (e.g. to execute the agreement).

Kumulus may refuse a request from a data subject if such request is manifestly unfounded or excessive or if it violates legal provisions. In such an event, Kumulus shall inform the data subject of its decision as soon as possible and in any event within one month, upon receipt of the request thereto.

Complaints with regard to the processing of personal data by Kumulus may be addressed to Belgian Data Protection Authority (in Dutch, French and German only)(consultable at <https://www.gegevensbeschermingsautoriteit.be/verzoek-klacht-indienen>).

If the request concerns personal data that is being processed by a third party appointed by Kumulus, such request will be forwarded to the third party concerned.

10. Data Security

Kumulus will make every effort to ensure that personal data is stored and processed securely.

The aim is to eliminate unauthorized or unlawful processing of personal data, or accidental, unauthorized or unlawful access, use, transferring, copying, transmitting, alteration, loss or damage, or any other type of processing of personal data.

For this reason, Kumulus has introduced adequate physical, technical and organizational measures and plans to protect and secure all personal data collected by Kumulus.

Kumulus uses password protection and restricts access to personal data (i.e. access to personal data is only shared on a need-to-know basis to those employees or personnel for whom the access is indispensable to deliver the services and to execute the agreement).

The websites owned by Kumulus are SSL secured.

Kumulus requires that third parties, who provide supporting services to store and process personal data, apply at least the same high level of protection with regard to the processing of personal data.

These measures applied by Kumulus do not relieve the data subject to secure its own personal data by regularly changing passwords, using secure passwords, keep passwords confidential, and not granting access to personal user accounts.

11. Changes to the Privacy Policy

Kumulus shall, from time to time, amend and update the terms of this Privacy Policy.

These changes will be posted in a link at the url's: www.hosteluppelink.com and www.kajaskorenlei.be. Therefore it is recommended to check the Privacy Policy before every visit.

12. Contact Details

You can contact Kumulus by email (office@hosteluppelink.com) or by telephone (+32 9 279 44 77) to:

- Receive more information with regard to this Privacy Policy;
- report remarks with regard to personal data (a.o. incorrect or incomplete data);
- exercise rights as described in article 9 of this Privacy Policy.

13. Complaints

Complaints with regard to how personal data is being processed by Kumulus (or third parties appointed by Kumulus as described above), or how a request or complaint has been handled, can be directly addressed to the Belgian Data Protection Authority. website (in Dutch, French and German only):

<https://www.gegevensbeschermingsautoriteit.be/verzoek-klacht-indienen>.

However, please raise that complaint first with Kumulus at office@hosteluppelink.com in order to find an amicable solution.

Cookie Policy BV Kumulus

1. General

This Cookie Policy is created by BV Kumulus (acting under its trademarks 'Hostel Uppelink' and 'Kajaks Korenlei'). It is a limited liability company, incorporated under Belgian law, with offices at 9000 Gent, Sint-Michielsplein 21, and registered in the Crossroad Bank of Enterprises under number BE0844.125.969, hereinafter referred to as 'Kumulus'.

Our websites, www.hosteluppelink.com and www.kajaskorenlei.be use cookies and other related techniques (for convenience all technologies are referred to as 'cookies'). Cookies are also placed by third parties we have engaged. In the document below we inform you about the use of cookies on our website.

2. Cookies on our Website

A cookie is a small simple file that is sent along with pages of this website and stored by your browser temporarily or permanently on the hard drive of your computer or another device. The information stored therein may be returned to our servers or to the servers of the relevant third parties during a subsequent visit. A cookie allows the server to recognize the User's computer. Some cookies are necessary for the proper functioning of the website, others help to improve the user experience.

Cookies can also be installed by third parties with whom Kumulus collaborates, or if the websites owned by Kumulus contain links to third party websites. Therefore, please consult the cookie policies of these third parties as well to be aware of how they handle the setting of cookies.

3. Consent

When you visit our website for the first time, we will show you a pop-up with an explanation about cookies. As soon as you click on "Save preferences", you consent to us using the categories of cookies and plug-ins you selected in the pop-up, as described in this Cookie Policy.

4. Enabling/ disabling and deleting cookies

Your Internet browser allows you to delete cookies automatically or manually. You can also specify that certain cookies may not be placed. Alternatively, you can set your internet browser to notify you when a cookie is set. More information about these options can be found in the instructions of the Help function of your browser. We would like to point out that our website may not work optimally when all cookies are disabled. If you delete the cookies in your browser, they will be reinserted with your consent the next time you visit our website.

5. Privacy

We refer to the Privacy Policy above for further information with regard to the processing of personal data.

6. Contact

For questions and/or comments about our Cookie Policy, please contact us by email at office@hosteluppelink.com.