



Privacy policy Dune Hotel Nieuwpoort

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1. Introduction

When you use the services of Dune Hotel Nieuwpoort, we must register some of your data. It is our policy to be extremely careful and to handle your data transparently. Through this privacy statement, we would like to let you know for what purposes and how we process your data process. This privacy statement applies to all personal data that we process when you make a booking with us, use our services, visit our website or when we contact you. This privacy statement was last modified on the 10th of October 2022 and supersedes all previous versions of our privacy statement.

The Controller in the sense of the General Data Protection Regulation and of other data protection provisions of legal character is:

Dune Hotel Nieuwpoort
Nieuwlandplein
8620 Nieuwpoort
Belgium

Tel: +32 (0)58 68 04 27
E-mail: info@oasisresorts.com
Website: www.dunehotel.com

2. Definitions

The privacy policy of Dune Hotel Nieuwpoort is based on the terminology used by the European body issuing directives and legislation upon adoption of the General Data Protection Regulation (GDPR). Our privacy policy is designed to be easily readable and understandable for the public, as well as for our customers and business partners. To ensure this, we would like to explain the terminology used hereinafter.

In this privacy statement, we use the following terms, amongst others:

Personal Data: “Personal Data” means any information relating to an identified or identifiable natural person. A natural person is identifiable, directly, or indirectly, using assignment to and identifiers, such as a name, an identification number, location data, online ID or one or more specific characteristics.

Data Subject: the “Data Subject” is any identified or identifiable natural person whose Personal Data is processed by the Data Controller.

Processing: “Processing” means any operation or set of operations performed with or without the help of automated procedures, in connection with Personal Data, such as collection, obtention, storage, changing, use, distribution or any other form of provision, deletion or destruction.

Controller, or Data Controller: the “Controller”, or the “Data Controller” is the natural or legal person, public authority, agency, or other body which decides on the purposes and means of Processing Personal Data.

Processors: a “Processor” is a natural or legal person, public authority, agency, or other body which processes Personal Data on behalf of the Controller.

Recipient: a “Recipient” is a natural or legal person, public authority, agency, or other body to whom the Personal Data is disclosed, regardless of whether it is a third party or not.

Third-party: a “Third Party” is a natural or legal person, public authority, agency, or other body apart from the Data Subject, the Controller, the Processor, and persons who are under the direct responsibility of the Controller or the Processor and are authorized to process the Personal Data.

3. What data do we collect and why?

Your data is mainly processed by us to provide you with the perfect holiday. We would like to build a lasting relationship with you, so that we can continue to serve you in the future and make offers based on your interests or booking history.

a. Booking a holiday accommodation

When you make a booking for one of the accommodations offered by us, we register as standard the information from you that is necessary to make the accommodation available to you. We offer the accommodations for rent ourselves but are also offered by our partners. We need your name and address details to be able to register your booking in our reservation system and for registration in the mandatory night register, but also, for example, to be able to comply with the obligation to file a tourist tax return. For the booking, we also need information such as your date of birth and bank account number.

We also create a profile based on your booking history, so we can service you even better with your upcoming holiday!

b. Booking details

Booking data is data about the holiday you have booked with us, for example, the type of accommodation, arrival date, departure date, travel group and preferences. To be able to arrange your booking, we register this information in our reservation system. You will receive confirmation of your booking at the e-mail address you have provided, as well as interesting information about the resort of your stay and the surrounding area.

Please note: When traveling with children under the age of 16, we will only register the information given by you and/or strictly necessary information. This information is mostly restricted to how many children you are traveling with and an indication (for example; 0 – 4 years) of their age.

c. Contact

If you contact us via the contact form on the website, your salutation, name, contact details and question or comment will be registered. When you ask a question via social media or the online chat, your name, e-mail address and the content of the conversation will be registered. The same applies if you send us an e-mail message. Registering the data is necessary to communicate with you. Moreover, this enables us to answer your question quickly and efficiently and to search for your data.

We also periodically send service e-mails, regarding, for example, online check-in, booking data and payment reminders.

d. My Account

After you have booked a holiday with us, you can activate a personal 'My Account'. With 'My Account' you can view and change your details. For this, we register the data you provided when making the booking. You can also see your booking history in 'My Account'.

e. Newsletters

After you have made a booking with Dune Hotel Nieuwpoort or you have registered for our newsletter via the website, we will use your e-mail address to send our (personalized) newsletters. Personalized newsletters mean newsletters that relate to holidays that show similarities with

holidays previously booked by you or that match the interests you have stated regarding holidays. In this way, you will not receive an unnecessarily large number of e-mail messages. You can unsubscribe from the newsletter via a link in the newsletter.

f. Advertisements on other platforms

We also use your e-mail address to show you advertisements on social media that match your interests. We can never see which advertisements are shown to which person, nor can we see whether a Social Media account is linked to your e-mail address. Let us know if you do not wish to see personalized advertisements on social media.

g. Surveys

We are very curious about how you experienced making your booking and the subsequent stay. After making a booking, we will therefore ask you to complete a survey, based on which we can improve the booking process. After your stay, you will receive a second request to complete a survey. We use your review about your stay internally to improve our services.

h. Cookies, placed via <https://www.dunehotel.com> (Read our cookie statement for detailed information)

To use the website and to make the website function properly, several data are stored. Think of IP address, location data, statistical data about surfing behaviour and website visits (scroll and click behaviour).

More information about cookies can be found in our separate cookie statements.

4. Grounds for data processing

In accordance with the GDPR we process your data on specific legal grounds. These are needed to be able to process your data. Below you will find an overview of the legal grounds we base our data processing on.

a. Necessary for the execution of an agreement

When processing your data, we adhere to the rules of the GDPR. There is therefore always a basis for processing your data. Your data is mainly processed when booking your holiday. We need this information for the execution of the agreement between you and Dune Hotel Nieuwpoort. If you do not provide us with the required personal data, you will not be able to use our services.

b. Legitimate interests

Dune Hotel Nieuwpoort has a legitimate interest in processing your data for sending surveys and conducting research. In this way, we can continuously improve our services. Processing

of your data to send our newsletters or show targeted advertisements is done by us to direct marketing.

We process your data at contact moments with one of our employees, so that we can process your questions, complaints or comments and provide you with an answer quickly. In addition, this enables us to build a lasting relationship with you.

c. Legal requirements

Processing of some of your data is also necessary to comply with a legal obligation. For example, we are legally obliged to register your name, place of residence, and arrival and departure dates in the night register.

d. Permission

If we want to know more information about you, we will always ask for your permission.

5. With which parties do we share data?

Dune Hotel Nieuwpoort shares personal data with third parties: this only happens when this is strictly necessary. In all cases, Dune Hotel Nieuwpoort will comply with the GDPR legislation as controller, specifically Article 28 of the GDPR.

We work together with certain third parties to guarantee the best service from Dune Hotel Nieuwpoort. Think of parties that arrange our financial affairs. Below we offer you an overview of external parties that receive personal data from you.

Overview of third parties receiving personal data from you:

- **Booking agency**
When you are booking with Dune Hotel Nieuwpoort, you will leave your information with the appropriate booking agency. Dune Hotel Nieuwpoort will receive this data to process the booking.
- **E-mail tooling**
We use e-mail tools to deliver you your information regarding your stay at Dune Hotel Nieuwpoort, but also regarding new offers and newsletter (when permission has been given).
- **Municipalities**
We do the mandatory tourist tax return based on the information provided by your data. The municipality of the holiday resort where you have stayed may want to have a check carried out on the declaration. At that time, we must provide the municipality with access to some of your data. Which data this depends on the requirements of the relevant municipality.
- **Insurance**
For insurance purposes we will need to know who is using our accommodations at what time. If any situation arises that may involve insurance, we need to share your information with the appropriate insurance agency.
- **Employees/external staff**
Our employees or external staff may need your information to deliver our services.
- **Accountant**
For proper accounting, personal data may be processed by an accountant. These are strictly necessary data, which are also stated on invoices.
- **Tax authorities/public authorities**

To comply with our tax liability and/or any other legal requirement, we share the necessary personal data with the Tax Authorities and other public authorities, if we are legally obliged to do so. The government can still apply separate rules, this responsibility lies with the other party.

- **F&B Partners**

We may use F&B Partners at our locations. These partners service the restaurants and, for example, may need your personal data to book reservations.

6. How long do we keep your data?

We do not store your data longer than necessary to achieve the objectives set out in this privacy statement unless we must keep the data for longer based on a legal obligation. According to Article 13 paragraph 2 sub an of the GDPR, we must then indicate the storage period of personal data.

a. Information relating to the agreement concluded with you

We anonymize your data that we process in our reservation system no later than **7 years** after our relationship has ended. We assume that our relationship has ended when you no longer make a new booking with us for the following **7 years** or when an agreement between you and Dune Hotel Nieuwpoort has been cancelled by either party.

b. Financial details

We keep our financial administration for **10 years**. This means that all your data and documents relating to financial transactions between you and Dune Hotel Nieuwpoort will be kept for another **10 years** after your stay. This also includes the information regarding an insurance policy taken out by you.

c. E-mail marketing

If you do not want to receive anymore newsletters or offers from us, you can simply opt-out using the button in the e-mail message. Your contact information will then immediately be deleted from our mailing list.

d. Information that we register during contact moments

Contact moments with our guest service via chat will be deleted within fourteen days after the contact moment unless the content of the messages can be important for your booking or any future bookings. We keep e-mail messages sent to or received by us and complaints submitted by you for a maximum of **10 years**.

7. Security measures

It is important that your information is secure with Dune Hotel Nieuwpoort. For that reason, Dune Hotel Nieuwpoort takes the necessary precautions to, as best as possible, ensure the safety of your personal data. Dune Hotel Nieuwpoort conforms itself at all times to Article 32 of the GDPR, regarding information security.

Measures are taken to ensure that all digital information is secure in our online system.

Personal data is only accessible to the authorized employees of Dune Hotel Nieuwpoort. These personal data are protected with a password. The devices on which your data is stored are locked with a password and/or fingerprint scan and/or face recognition. This naturally includes the necessary devices, such as computers, laptops, and mobile phones. Your visit to the Dune Hotel Nieuwpoort website is also secured using HTTPS security. This means that your

connection to Dune Hotel Nieuwpoort is private. With this, we ensure that your data remains safe during a website visit.

For the sake of completeness, more information about online security:

- Security software, such as a virus scanner and firewall.
- We send your data via a secure internet connection. You can see this in the address bar 'HTTPS' and the padlock in the address bar.

8. Transfer of Personal Data abroad

The data collected by the entities of Dune Hotel Nieuwpoort, in the context of a booking, are in principle not processed outside the European Union (EU) or the European Economic Area (EEA).

Nevertheless, a transfer may take place to countries that have not acceded to the EU or the Agreement on the EEA and which do not have an equivalent level of data protection to that established in the EU:

- In case of a legal obligation
- About a booking, an offered by Dune Hotel Nieuwpoort destination outside the EU or the EEA, the transfer of Personal Data may take place. To ensure that the stay and the booked activities take place as they should, and strictly within the framework of the reservation agreement to which you are a party, your Personal Data - subject to applicable data communication agreements - will be transmitted or made available to the local entity of Dune Hotel Nieuwpoort which manages the site of the destination.

If a service provider is used, necessary for the performance of an agreement to which you are a party, Dune Hotel Nieuwpoort undertakes to provide appropriate guarantees as required by EU law to provide an adequate level of data protection.

9. Your rights concerning your data

Below we give you an overview of the rights you have regarding your data and our use thereof. Although we collect and minimally process personal data at Dune Hotel Nieuwpoort, we think it is important to point out the rights you have under the GDPR.

a. Right of Access (Article 15 GDPR)

At any time, you have the right to request your data, which are recorded and stored at Dune Hotel Nieuwpoort. This can be done by sending an e-mail. You will then get a clear overview of your data.

b. Right to rectification (Article 16 GDPR)

Are your data (which we hold) no longer corrected or has it changed? Then you have the right to have this corrected by Dune Hotel Nieuwpoort.

c. Right to transfer data (Article 20 GDPR)

According to the GDPR, you have the right, if reasonable and possible, to request Dune Hotel Nieuwpoort transfer data to another party.

d. Right to erasure of data (Article 17 GDPR)

In certain cases, you have the right to ask Dune Hotel Nieuwpoort to destroy data. You can do this by invoking the right to be forgotten. In the following situations, Dune Hotel Nieuwpoort must destroy your data:

- Dune Hotel Nieuwpoort no longer needs your data for purposes for which Dune Hotel Nieuwpoort collected the data.
- You have explicitly permitted Dune Hotel Nieuwpoort to use data but are now withdrawing it.
- You object to the processing of data. **You have an absolute right to object to direct marketing.**

Are your interests greater than Dune Hotel Nieuwpoort' interests in the processing of your data? Then you have a relative right of objection. This means that erasure does not have to take place immediately, but only when it has been established that your interest outweighs it.

- If Dune Hotel Nieuwpoort would process your data unlawfully, you immediately have the option to ask for the data to be deleted. This can be done, for example, when there is no legal basis for the processing of your data.
- If Dune Hotel Nieuwpoort has exceeded a legal retention period, Dune Hotel Nieuwpoort is obliged to delete your data.
- If you as a data subject are under 16 years of age and Dune Hotel Nieuwpoort has collected your data via the website, you can ask Dune Hotel Nieuwpoort to delete the data immediately.

There are exceptions to the right to be forgotten from the GDPR. For more information, see the following page.

e. Right to complain with the Data Protection Authority

You always have the right to complain to the appropriate Data Protection Authority if you feel that Dune Hotel Nieuwpoort has not handled your data correctly. The applicable Data Protection Authority differs from country to country and is not EU-wide regulated. When making use of this right, make sure you are contacting the right Data Protection Authority, as the request else may be inadmissible.

f. Right to stop data consumption, objection (Article 21 GDPR)

You have the right to object to data use at any time. Especially in the case of direct marketing.

g. Use the rights mentioned above?

In most cases, an e-mail to info@oasisresorts.com is enough to exercise your rights. Do we doubt that you are whom you say you are? Then we can request you to provide a copy of your ID. We always ask you for a copy of the identity document, as prescribed by the central government. However, in most cases, a less invasive way of finding identity will be sufficient.

10. Duties

Dune Hotel Nieuwpoort processes your data, as indicated, based on legitimate interest. Your data will never be sold to a third party. The data that is mandatory to provide are the minimum necessary personal data that are necessary for the provision of services. If you do not provide this mandatory data to us, Dune Hotel Nieuwpoort cannot (properly) offer the services. If it is necessary to share your data with parties other than the parties, your consent will of course first be requested by amending our Privacy Statement. We always make changes known via the Dune Hotel Nieuwpoort website.



Dune Hotel Nieuwpoort reserves the right to disclose data when required by law, or when Dune Hotel Nieuwpoort deems this justified to comply with a legal request or process. Also, when it comes to ownership or protecting Dune Hotel Nieuwpoort. We hereby try to respect your right to privacy as much as possible.

Do you have any questions about our privacy policy? Please feel free to contact us via the contact information below.

Tel: +32 (0)58 68 04 27

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