

1 SCOPE

This document describes how Clink Hostels collects, handles, protects and transfers personal data of data subjects for whom we process data in line with the requirements of the GDPR.

2 PERSONAL DATA DEFINED

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

3 RESPONSIBILITIES

3.1 Data Protection Officer

The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Clink Hostels collecting and processing their personal data.

3.2 Clink Employees/Staff

All Employees/Staff of who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

4 Clink Hostels PRIVACY NOTICE

4.1 Who Are We?

Clink Hostels, (referred to as "Clink") is Europe's fastest growing hostel brand located in the most central locations across Europe including Amsterdam, London and with two new hostels opening in Dublin and Lisbon

Our head office address is: Clink Hostels, Clink Hostels Limited, Clink Head Office, Bed Reservations Jersey, 1 West Centre, Bath Street, St Helier, Jersey, JE2 4ST

The contact details for the companies that locally run our Group's hostels, and who can help with any questions about your stay, are provided in the appendix of this document.

Our Data Protection Officer can be contacted about any matters covered in this notice:

By email: dpo@Clinkhostels.com

4.2 Who Does This Notice Apply To?

This notice applies to following individuals and categories of individuals:

- **Customers:** Individuals making bookings; Individuals making payment transactions; Guests and Visitors to one of our Hostels or other premises; Anyone calling one of our phone numbers; and Anyone visiting or using any one of our Websites; Apps; Reservation or Guest Services Teams ("**Customer Data**");
- **Contacts:** We retain contact data for the period where it is in our Legitimate Interest to help us to grow and improve our organisation. This includes Clink's suppliers, partners, contractors and contingent workers, prospective clients, other business contacts, merchants accepting payments and other individuals whose personal data we collect in the course of our business ("**Contact Data**"); and

- **Employees:** Clink Employees, former employees, dependents and beneficiaries of employees, former employees, and prospective employees in connection with their working relationship or application for employment ("**Employment Data**").

Note: Employees should refer to Clink's Employee Privacy Notice for details.

4.3 When Do We Collect Personal Data?

- In response to a lawful request from a court or government agency or to otherwise comply with applicable law or compulsory process;
- For other purposes required or permitted by law or regulation;
- For protecting Clink's legal rights or assets;
- When fulfilling a transaction initiated by or involving a Data Subject;
- When fulfilling a transaction with or for our clients;
- When you use our wi-fi;
- When transferring certain data where necessary or required to other participants in a transaction processing chain, such as card associations and debit network operators and their members;
- When providing the data to agents and contractors to assist us in our business;
- When enforcing our rights or the rights of other persons in a financial transaction;
- For fraud prevention or investigation, or other risk management purposes;
- For identification and information verification purposes;
- In emergencies where the health or safety of a person is endangered;
- Training;
- When facilitating the acquisition or disposition of Clink businesses, including providing Personal Data to prospective purchasers;
- For Business development;
- When maintaining and building customer relationships;
- During Business planning;
- For Facilities Management;
- When maintaining & supporting technology including infrastructure; Software and Database systems;
- Maintaining the security of data collected and processed; and
- On the written request of the Data Subject, where appropriate; and
- Clink Employees should refer to Clink's Employee Privacy Notice for details.

4.4 Why Do We Collect Personal Data?

We collect and process personal information to:

- Receive & respond to enquiries; make, amend & administer room bookings, process & store payment details, provide access to other products and services (such as meals), provide existing customers with information about our properties, to give them access to special offers and to gather customer feedback to help us to improve the services that we offer and to improve our customers' experience whilst visiting or staying at one of our premises;
- Enable us to fulfil our contracts with our guests;
- Comply with legal requirements;
- Maintain the security and safety of our premises through CCTV; and
- Understand who we are accommodating at our properties for your safety, for the safety of our other guests, visitors to our premises and for the safety of our staff and to protect our business.

In some instances, we also collect and process personal information in Clink's legitimate interests to:

- Seek to prevent and detect crime;

- Promote our business; and
- Undertake market research and direct marketing, including analysis to create profiles.

We sometimes use Web Sites and Social Media on the legal basis of our legitimate interest to protect and expand our business as follows:

- When you post on social media about our business, we may use your contact details to respond to any complaints or comments;
- Website user and guest data are collected for statistical purposes;
- To support this and our other legitimate interests our websites use third-party marketing and analytical cookies. Similar technologies are included in our marketing emails, as explained in our Cookie Notice;
- It is possible to reject or block cookies in your browser settings and to remove yourself from our marketing emails by unsubscribing from them.

4.5 What Personal Data Do We Collect?

Clink processes and transfers Personal Data including, in some instances, Special Category Personal Data relating to the following types of Natural Persons as follows:

4.5.1 Customers' Personal Data

Booking-Related:

We need some information in order for us to confirm bookings; complete reservation or welcome guests and visitors to one of our Hostels or other premises. This will usually consist of:

- Guest name
- Telephone number
- Date of birth – asked for at check-in.
- Gender
- Nationality
- ID (passport, driving licence) -required only at check-in.
- Email
- Date of arrival and departure
- Credit card details - when a booking is made over the phone or via our secure online platform: Mews.

Upon arrival we will require the same information from your fellow travellers, please ensure they are all aware of this to ensure a quick and efficient check-in.

Credit Card Data

In order to guarantee reservations via all channels including but not restricted to telephone, website or smartphone application we require a full 16-digit debit/credit card number, name on the card, card type (we accept VISA, Mastercard or Maestro) and the expiry date.

Your debit/credit card details are only used to secure your booking and Clink Hostels will only debit the account if you do not follow our cancellation procedure. Reservations that are cancelled at least 24 hours prior to arrival are not charged for, whereas no shows or failing to cancel in excess of 24 hours will incur a charge for the first night.

Clink Hostels indemnifies itself against all data use on and reservations made via third party websites/agents. Please refer to their relevant privacy policy and terms and conditions.

4.5.2 Contacts Personal Data

Clink's collects Suppliers, partners, contractors and contingent workers, prospective clients, other business contacts, merchants accepting payments and other business contacts personal data in

the course of our business. Clink are committed to protecting these individuals' rights and freedoms as they relate to data privacy and protection through the measures explained throughout this privacy notice.

4.5.3 Employee's Personal Data

Clink Hostels respects employee privacy. Employees should refer to Clink's Employee Privacy Notice for details;

4.5.4 Clink's Handling of Special Categories of Data

Sensitive data, referred to as Special Category Data, include: Racial or Ethnic origin; Political opinions; Religious or philosophical beliefs; Trade Union membership; Genetic or biometric data used for the purpose of uniquely identifying an individual; Data concerning health; or Data concerning a natural person's sex life or sexual orientation.

Clink does not routinely collect sensitive or Special Category Data. Where exceptions occur Special Category Data is only collected when:

- You, or someone to whom you've given explicit consent to act on your behalf, provides this type of information to us it may be possible for us to store that data where it is in your vital interests that we do so. An example of this would be where you have specific needs that could impact your safety whilst you stay with us.
- Explicit Consent has been provided, in the case of a child (a person below the age 16 years), by an authorised holder of parental responsibility for that child;
- It is in the person's vital interests that we do so - for example where there are specific needs that could impact the individual's safety whilst staying at one of our properties; and
- In all other situations, however, we will need to ask for your explicit consent to store or otherwise process health-related or other special categories of personal information.

4.6 Disclosing Information to Third Parties

- Clink respects individuals' privacy. This means that, other than the for the purposes referred to in this policy, we will not sell or disclose any personal information to any other person, business or third-party without your consent except in the case of an emergency or where we are legally obliged to do so (for example, if required to do so by court order or for the purposes of prevention of fraud) or where we see it as part of our duty of care;
- On occasion Clink may feel that it is in a person's vital interest or within our duty of care for that individual to provide personal information to a third-party. For example, there might be a risk that you have been exposed to a health threat and that your vital interest is best-served if we provide your contact details to a health authority representative or doctor;
In cases where the matter is not urgent, we will always seek your express consent to do so. However, if a situation arises where we feel that the matter is more urgent then we will write to you to inform you that we have provided your private information to a third-party; who that third party is, their contact details and a justification for our urgent action;
- We disclose your personal data to payment providers, technology providers, insurers, and other specialist professional and technical service providers and advisers, to manage your bookings, arrange payments, and provide services; and
- In some cases, we may transfer your personal data outside the European Economic Area. Where we do this, we will use appropriate and proportionate safeguards and require contractually that these greater or equal safeguards are implemented by the recipients (processor) who will be obliged to preserve your data privacy and protection rights. The processor will be restricted from passing your data to a third party or third country without our explicit consent which will only be granted where security is greater than or equal to the measures that we employ and where your rights are contractually preserved.

4.7 How Long Do We Keep Personal Data?

Details of the periods that Clink Hostels retains, and processes personal data can be found in Clink's Data Retention Policy. In summary, for the purposes of this document, we operate the following broad guidelines for the retention and processing of personal data:

Employment Data: Employees should refer to Clink's Employee Privacy Notice for details;

Customer Data: For 3 years or until such time as the purpose for which the data was collected is no longer valid whichever is the shorter;

Contact Data: We retain contact data for the period where it is in our Legitimate Interest to retain it to help us grow and improve our organisation. This includes Clink's suppliers, partners, contractors and contingent workers and prospective clients.

Where we process personal data on the basis of your consent, we will retain it for as long as required for the specified purpose. We also keep your data

- For a period that allows us to fulfil our contract with you, provide services to you and respond to your questions or complaints;
- For the period required by local law concerning keeping records;
- To allow us to uphold or protect contractual or legal rights; or
- Where it is in your or another party's vital interests or our legitimate interests.

We may also be required to keep personal data in line with any statutory limitation periods and for tax, legal or regulatory purposes.

4.8 Keeping Our Data Up-to-Date

As an accommodation and leisure provider, we have guests returning to our properties on a regular basis. It is your duty to inform us if any of your personal information which we hold about you needs to be updated. We may contact you at any time if you have booked accommodation with us and we suspect we hold false information about you.

4.9 Web Sites

4.9.1 How We Use Cookies

When you use our websites, we aim to make your experience engaging. In order to do this, we use cookies. Cookies are small text files which are sometimes downloaded on your computer or mobile device when you first visit our website so that we can remember who you are.

Usually, cookies contain two pieces of information: a site name and unique user ID. Cookies cannot be used alone to identify you, although they may be used to identify your IP address. Cookies help us and/or third-party websites recognise your device the next time you visit and may remember details such as your username and preferences, analyse how the website is performing, or allow us to recommend content we believe is relevant to you.

Generally, cookies used on this website may perform the following functions:

4.9.2 Essential Cookies:

These temporary cookies only remain in the cookies folder of your browser until you leave our website.

4.9.3 Performance Cookies:

These cookies are stored on your computer – they contain no personal information and are used to improve performance and assist in navigation. They remain in the cookies folder of your browser for longer than "Essential" cookies (dependent on your browser settings).

We use or allow third parties to serve cookies that fall into the categories above. We use Google Analytics to help us monitor our website traffic, and cookies may also be served via Clinkhostels.com or any of our subsidiary domains, online surveys, and online publications.

We may also use third party cookies to help us with market research, revenue tracking, improving site functionality and monitoring compliance with our Terms and Conditions and Copyright Policy as stated in our Terms and Conditions.

By using our website, you agree that we can place these types of cookies on your device. We may change 'HOW WE USE COOKIES' from time to time. It is your responsibility to check the policy regularly. You will be deemed to have accepted any amendments to the policy if you continue to make use of the website after a change to 'HOW WE USE COOKIES' has been made.

We have links to social networking websites (for example but not limited to: Facebook, Twitter, LinkedIn) from Clink Hostels. These websites may place cookies on your computer. We do not control how they use their cookies. We suggest you check their website to see how they are using cookies.

For more information about cookies, visit www.aboutcookies.org which includes useful information on cookies and how to block cookies using different types of browser. Please note that by blocking or deleting cookies, you may not be able to take full advantage of our websites.

4.9.4 Third Party Websites

Our website contains links to many other websites promoting their business and needs to our guests. Clink Hostels indemnifies itself against all data use on and reservations made via third party websites/agents. Please refer to their relevant privacy policy and terms and conditions.

4.9.5 Google Analytics & Demographic Data

We use Google Analytics to collect information about visitor behaviour on our website. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. This Analytics data is collected via a JavaScript tag in the pages of our site and is not tied to personally identifiable information. We therefore do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

You can find out more about Google's position on privacy as regards its analytics service at <http://www.google.co.uk/intl/en/analytics/privacyoverview.html>

The tracking cookie also allows us to access aggregates demographic and audience data from online behavioural advertising services. This information is only available to us at a group level, with no personal or identifiable information contained within it. It is used only for us to evaluate the effectiveness of the website and see how different groups of users use and respond to the site, and in no way allow us to track people individually. You may opt out of this tracking by disabling cookies within your browser.

4.9.6 Website Security

The Internet is not a secure medium. However, we have put in place various security procedures, including firewalls that are used to block unauthorised traffic to our website.

4.10 Your Data, Your Rights

4.10.1 Your Rights

By submitting your information to us, you consent to the use of that information as set out in this Privacy Policy. At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- You have the right to object to certain types of processing such as direct marketing;
- You have the right to object to automated processing, including profiling;
- You have the right to request a copy of the information that we hold about you;
- You have the right to ask us to correct the data that we hold about you that is inaccurate or incomplete;
- In certain circumstances you can ask for the data we hold about you to be erased from our records;
- Where certain conditions apply you have the right to ask that we restrict the processing of your personal data; and
- You may have the right to have the data we hold about you transferred to another organisation.
- Right to judicial review: if Clink Hostels refuses your request under rights of access;
Note: we will always provide you with a reason as to why we have refused your rights request;
- You have the right to complain as outlined in Section 5 of this document;
Note: Rights requests will be forwarded on to a third party if one is involved in the processing of your personal data.

4.10.2 Sharing of Our Personal Data

Your personal data will not be shared with, or provided to, any third party except in the following situations:

- You consent; or
- Data is necessary:
 - a) For provision of services – for example credit card details will be exchanged (a) with your bank for your booking to be confirmed; or
 - b) Clink Hostel's is obliged to provide the personal data on the basis of law or upon order by a public authority.
- it is specifically allowed by applicable legal regulations.

4.11 Data Security

Clink Hostels will make every effort to ensure that your personal data is stored securely.

The aim is to eliminate unauthorized or unlawful processing of your personal data, or accidental, unauthorized or unlawful access, use, transferring, processing, copying, transmitting, alteration, loss or damage of your personal data. Despite all efforts and meeting all rules set out by applicable legal regulations, it is not possible to guarantee the security of your data, if it is transferred or transmitted in an unsecured way.

For this reason, we have introduced adequate physical, technical and organizational measures and plans to protect and secure all information collected by our services using

- Using Cryptography, where necessary;
- Using password protection, where necessary; and
- Restricting access to your personal data (i.e. access to your personal data is granted only to those employees or personnel for whom the access is indispensable for the purposes described in this document and in our full privacy policy).

We require that our partners, who provide supporting services that help us to store and otherwise process your personal data, apply the same high level of protection to your data.

Note: These measures do not remove your duty to secure your own personal data. You should, inter alia, regularly change your passwords and should never use predictable usernames and/or

passwords, share your password with other persons, or grant access to your User account and/or disclose your personal data to other persons.

5 COMPLAINTS

In the event that you wish to make a complaint about how your personal data is being processed by Clink Hostels or third parties (as described in 4.6 Disclosing Information to Third Parties), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority. In the first instance please raise that complaint with Clink Hostels' Data Protection Officer in the first instance.

Clink Group Data Protection Officer (DPO) can be contacted as follows:

Contact Name:	The Data Protection Officer
Address line 1:	Clink Hostels,
Address line 2:	Bed Reservations Jersey Ltd
Address line 3:	1 West Centre
Address line 4:	Bath Street
Address line 5:	St. Helier. Jersey JE2 4ST
Email:	dpo@Clinkhostels.com

If you remain unhappy with the handling of your case, then you have the right to contact the UK Information Commissioner's Office (ICO) as follows:

By phone (UK)	0303 123 1113
By phone (outside UK)	+44 1625 545 700
ICO Web Page	https://ico.org.uk/make-a-complaint/your-personal-information-concerns/
Email	dataprotectionfee@ico.org.uk

6 CHANGES TO OUR PRIVACY POLICY

We may change our Privacy Policy at any time. Continued use of our websites signify that you agree to any such changes.

Please be aware that the privacy policy is in English. For any support in a foreign language please contact dpo@Clinkhostels.com

7 ADDRESSES AND CONTACT DETAILS FOR PROPERTIES

Clink Hostels:

Budget Accommodation Limited

Address:

Unit 3, Dargan Industrial Park
60-84 Dargan Crescent
Belfast, BT3 9JP

Directors:

Miss Kristine Graudina

Bed Reservations Alpha Limited

Address:

Bed Reservations Jersey Ltd
1 West Centre
Bath Street
St. Helier.
Jersey JE2 4ST

Directors:

Pauline Anne Doyle
Timothy Frank Walker
Agnieszka Smigla

Bed Reservations Jersey Limited

Address:

Bed Reservations Jersey Ltd
1 West Centre
Bath Street
St. Helier.
Jersey JE2 4ST

Directors:

Agnieszka Smigla
Timothy Frank Walker
Pauline Anne Doyle

Accommodation Consultants B.V.

Address:

St Vitusstraat 90, 1211PK Hilversum
The Netherlands

Directors:

Fabio Ferrari

Trugate B.V.

Address:

Badhulksjade 3, 1031 KV
Amsterdam
The Netherlands

Directors:

Adriaan Hendrik Jan Risseeuw