



PRIVACY STATEMENT

by FLAT HOTEL MIDI 33

At Flat Hotel Midi 33, we take the protection of the confidentiality of your data very seriously. This Privacy Statement (the "Statement") describes what data we collect about our hosts, visitors, website users and mobile apps, gift voucher buyers, subscribers, callers, business contacts and any other person on the site where appropriate, (each hereinafter referred to as "host", "user", "you", "your").

Flat Hotel Midi 33 offers tourist accommodation under the regional category for long- and or short-term guests as a apart-hotel including a breakfast area, a lounge, a laundry room, a private car park, front desk and numerous hotel services.

Upon your consent and for marketing purposes, we sporadically send you messages concerning news, offers, products, and services we and our partners recommend, which may interest you, as further described in detail, through email and or other marketing channels. You can change your preferred marketing channels by following the link in the subscription confirmation email which is sent to you as a result of your subscription request.

We will be delighted to welcome your family, including your children, at Flat Hotel Midi 33. However, our services, including our website, apps and other service related offers, are not directly intended for your children and should not be used by them without supervision. For more information, please read the Information section on children below.

Please read this statement carefully; By visiting our website, and using our services or otherwise interacting with us, you agree to the data processing activities described in this privacy statement. Please note that all associated websites are subject to their own terms and conditions, and privacy statement. If we modify this statement, your continued use of our website and services will constitute your acceptance of the modified statement.

If you have any questions regarding this statement, please contact us at flat@midi33.be, or write to us at Flat Hotel Midi 33, Boulevard du Midi 33, 1000 Brussels, Belgium. Please note that your enquiries will be processed during office hours in Belgium, and we will try our best to respond as quickly as possible.

This version of our privacy statement was published in September 2018.

Table of Contents

1. What information can we collect about you?
2. Cookie statement
3. How do we use your data?
4. Your right to refuse
5. Disclosure of your data
6. Is my data transferred abroad?
7. Security of your data
8. How long do we keep your data?
9. Information about children
10. Your rights



1. What information can we collect about you?

We may collect and process the following data about you:

Information that you communicate to us. You can provide us with even partial information by completing forms, setting up an account or user profile, subscribing to newsletters and other services, making or cancelling a reservation or ordering a product, by applying for job offers, uploading data to our website, making an "enquiry" about Flat Hotel Midi 33, using our contact form, participating in one of our online surveys, random draws or promotions, or by contacting us for personal or professional purposes via email, phone, or otherwise. This information may include your name, email address, billing address, room preferences or special requirements, phone number, guarantee and deposit data to secure your reservation, content of any email you send us, and any other data of the same nature. You have no obligation to provide us with this information, but without it we may not be able to respond to you and provide you with access to the content, services, or information you request from us.

Information collected during your stay. We record the details of your expenses and other charges made to your room. Specific information about your stay may also be stored, such as requests for services, creditworthiness, special preferences or requests relating to health issues. Information specific to your stay will be recorded in our real estate software and associated with those from your previous stays in this property. Images of your person may be recorded if you are in the areas monitored by our CCTV system.

Data collected about you. With reference to your visits to our website or your use of our applications, we may collect:

Data that does not reveal your identity, for example, the type of destination that you are looking up the information for. We use this data primarily to ensure the relevance of the messages, and we may link them to your name or email address;

Technical data, including the Internet Protocol (IP) address used to connect your computer to the Internet, your connection details, the type and version of the browser, the time zone set, the date and time of the access to our website, types and versions of browser modules, operating system, and other related information.

and

Information about your visit, including the complete flow of URL clicks to, via and from our website, pages viewed or searched, page response times, download errors, length of visits to certain pages, the page's interaction information (scrolling, clicks, and cursor pointers), and the methods used to navigate the page.

Information about children under 16 years old. We will collect certain information about your children as described in the Information about Children section below.

Information obtained from a person making a reservation for your account. If you are acting on behalf of another person, you must confirm that you are authorised by that person to provide their personal data and that the information you provide to us is accurate. You may be liable for any loss or damage we suffer as a result of a breach of this commitment by you.

Information about you obtained from third parties. We may obtain information from credit reference agencies, online travel agents that you have used to make a reservation or request, our broadband providers and other service providers who will inform us, for billing purposes, whether our guests have used certain services and other third parties. In addition, in anticipation of your stay, we may collect your photo from publicly available sources so that we can recognise you upon your arrival and provide you with exceptional customer service.



Where European data protection laws apply to our processing of your information, for example, if you do business with Flat Hotel Midi 33, then some of the information collected about you by this company may constitute what is called the 'personal data'. In this case, you will be considered as a "data subject". Personal data will include any information from which you may be directly or indirectly identified, including by reference to an identifier such as a name, an identification number, location data, an online identifier, or by one or more factors specific to your physical, physiological, genetic, mental, economic, cultural, or social identity. When necessary, we will treat your personal data in accordance with these laws.

2. Cookie statement

What are Cookies?

In order to collect some of the information described in this statement, we may use cookies and Web beacons, and other similar technologies on our site and our apps. A cookie is a small piece of information sent to your browser and stored on your device. First-party cookies are issued by the site you visit. Third-party cookies are set by third parties such as Google. For more information about cookies, please visit www.allaboutcookies.org.

Cookies set by our website

We use the following cookies:

Strictly necessary cookies.

These first-party cookies are essential for you to navigate our website and use its features. Without them, the services requested cannot be provided. They are deleted when you close the browser.

Performance cookies

These first-party cookies collect information about how our website and applications are used by our visitors. They allow us to recognise and count the number of visitors, to see how visitors are navigating on the site, and to identify the regions from which they are connecting.

Functionality cookies.

These first-party cookies allow our website and applications to recognise your choices, such as your username, language, or region, and to provide enhanced and personalised features.

Analytical data. We may use third-party analytics services such as Google Analytics and others. Your IP address and other information will be collected in an automated manner to evaluate your use of the website, compile summary reports on website activity, identify usage patterns, and provide related services. These providers may maintain and use aggregate data collected from our users as part of their own business, including to improve their products and services. For more information on how Google Analytics uses your information, please click here. In addition, authentication and tracking logs will be used to compile user statistics.

Targeting or advertising cookies.

These cookies allow us and our advertisers to offer you more relevant ads based on your interests and demographic profile, and to measure the effectiveness of advertising campaigns. They remember that you visited our website, the length of your visit, the advertisements you viewed, and information about your "usage profile". These are permanent cookies which will be kept on your device until they expire, or are manually deleted. As a result, you may see our ads on other websites that participate in ad networks managed by third-party vendors, such as Google AdWords, Bing Ads, Facebook, and others.

Social media cookies.



These cookies improve the way you use your social networks such as Facebook, Twitter, Instagram, and others. These are permanent cookies which will be kept on your device until they expire, or are manually deleted. If you use these features, the plug-in and its content will be loaded directly from the servers of the social network providers, and included in the website by your browser. If you sign in to your social network account when you interact with the plug-ins on our website, the social networking provider will link this information to your social media user profile. We have no influence on the personal data that the social network provider will collect about you. For more information, please see the privacy statements of Facebook, Twitter, Instagram, and others.

We may associate this information from cookies and other technologies with other information about you.

Consent for cookies

We presume that you are satisfied by the addition of our cookies on your device. Upon arriving on our website, you will sometimes see a pop-up message prompting you to accept the placement of advertising cookies on your device. To give your consent, please click on "I understand". Once your consent is registered, this message will not be displayed on your next visit.

3. How do we use your data?

We may process your data, in accordance with the legislation, for:

- (a) responding to your questions, complaints and requests, and dealing with them;
- (b) processing your reservations or cancellations, providing the services, products or content you requested, managing and administering your user account, providing service communications and enabling you to use interactive features of our applications and websites, when you wish to do so;
- (c) providing you with personalised and high-end customer service before, during and after your stay, whether you are a new customer or not. To do this, we may create a profile about you including information from our real estate software, which will also allow us to improve the relevance of our communication;
- (d) posting content on our websites and applications, such as news stories, product reviews, comments, and photos that you have provided;
- (e) allowing our suppliers and service providers to perform certain activities on our behalf, including the hosting of our websites, applications and booking platforms, as well as audit, technical, logistical or other functions;
- (f) sending you marketing communications, alerts and newsletters through our marketing channels, and sending personalised advertisements to your devices, subject to your consent, or as otherwise permitted by law;
- (g) communicating with you and administering your participation in special events, programmes, surveys, contests, sweepstakes, and other offers or promotions;
- (h) administering our business, including financial transactions, credit control, and recoveries;
- (i) ensuring the security of your user account, our premises and facilities, and our activities, for example, by monitoring account activity and deploying a video surveillance system; verifying your identity, when required, preventing or detecting fraud or abuse on our sites, in connection with our products and services, for example, by requesting verification data in order to reset the password of your account; implementing and enforcing the terms and conditions of our business, or any other contract with you; administering the technical component of our website, including problem solving, diagnosis of technical and service issues, testing, encryption, and other similar operations;



(j) performing data analysis, statistical research, and trend analysis in relation to user activity, demographic information, host profiles, user comments, or other contributions, with a view to developing and improving our websites, products and services, and ensuring the effectiveness of our business efforts;

(k) complying with applicable laws, for example, in response to a demand from a court or regulatory body, where the demand is made in accordance with the law. We also record data to comply with financial reporting requirements, including those imposed by auditors and regulators. We may also collect certain data in accordance with local laws (for example, the passport number, the names of all guests spending nights, including those of children and spouses).

The legal basis for processing your personal data for the purposes described above generally includes:

the processing required to fulfil a contract, such as our terms and conditions, or the terms of the reservation agreement between us, including processing for the purposes set out in paragraphs (a), (b), (c), and (d);

the processing needed to ensure our legitimate interests or those of third parties, including processing for the purposes set out in the paragraphs (e), (f), (h), (i), (j), and (k), which is carried out on the basis of our legitimate interest to ensure that our website, our content, and our services are competitive and provided efficiently, without delay, and in a friendly and personalised manner, taking account of the comments, data and profiles of users, to ensure the safety of our operations and information of our users, and to ensure the proper and effective administration of our activities, unless consent to this processing is required under the applicable law;

your consent, such as for processing for the purposes set out in paragraph (g) and 2 where such consent is required by applicable law;

the processing necessary to fulfil a legal obligation to which we are subject, such as processing for the purposes set out in paragraph (l); and

other legal grounds applicable to the processing, if any.

4. Your right to refuse

If you wish us to stop sending you marketing communications, you can use the opt-out link here, the unsubscribe link in our marketing communications, or change the settings of your apps. Although we encourage you to use the refusal link and the parameters of your applications as they are automatic, you can also send us a request at flat@midi33.be, or by phone at +32 (0) 2 511 2838. Please note that your enquiries will be processed during office hours in Belgium, and we will try our best to respond as quickly as possible.

If you or another user of your device wishes to revoke your cookie consent at any given time, you may accept or decline cookies by changing the setting of your browser. If you opt out of cookies, you will not be able to discover the interactive features of our website, our content, or our services in their entirety. In some cases, when you reject cookies, a new cookie (refusal cookie) is placed on your web browser. This tells the third-party provider to stop collecting data from your browser and prevents advertisements from appearing.

5. Disclosure of your data

We may legally disclose your data to third parties for the purposes listed above, including:

our subsidiaries, affiliates, branches, or associated offices through their access to our systems, such as real estate software or otherwise;

our partners that we manage on behalf of third party owners. We may share your booking data with these third party owners when necessary, to process your booking or other requests. In addition, health, security, or your preferences data may be shared to improve your experience as guest. Please note that if we stop managing a



particular establishment, all your personal data remains in our possession. However, the data of the guests needed to process the current bookings and that historically shared with the owner are retained by the latter;

the public, when you have given information about our blogs, forums, and discussion groups;

outsourced vendors, service providers, consultants, database vendors, incident response or business continuity providers; our partners who manage the customer relationship; our marketing and advertising communications partners;

online travel agents that you use to make a reservation or request;

the payer, such as your employer who pays on your behalf and receives your billing information;

third party residential property developers, subject to your consent;

legal entities, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, financing, sale, merger, reorganisation, a change of status, dissolution, or similar event. In the event of a merger or sale, your personal data will be permanently transferred to the "successor" company or the new owner;

the authorities when we are required to do so by law; and

any other third party to whom you have given your consent.

6. Is my data transferred abroad?

We may transmit your data outside the country in which it was collected for the purposes and to the parties indicated above.

It is possible that such data transfers are made to a country that cannot provide the same level of confidentiality as that guaranteed by the country in which the data was collected. However, we will take reasonable measures (including, where appropriate, the conclusion of data transfer agreements in accordance with the standard clauses of the European Commission) to ensure that your personal data is adequately protected by using appropriate technical, organisational, contractual, and legal means.

7. Security of your data

We strive to protect your information through the measures listed below. Unfortunately, we cannot always guarantee absolute security. Unauthorised seizure or use, hardware or software failures, and other factors beyond our control may compromise the security of your data. Nevertheless, we will respect our obligation to implement appropriate technical and organisational measures to ensure an adequate level of security of your personal data in order to protect you against the risks of infringement of your privacy.

In addition, we take steps to ensure that only authorised persons have access to this data. When you sign in to fill out or edit a reservation or service, your online interaction is protected from illegal eavesdropping by state-of-the-art encryption technology depending on the browser you use. Credit card information is transmitted and stored in encrypted form, and is only decrypted when needed to receive payments or guarantee future stays. Access to unencrypted credit card data is limited to authorised individuals in accordance with the best practices of the payment card industry's security standards. We work to protect the security of your data when transmitting using SSL (Internet Exchange Security Protocol), which encrypts the data you have entered, and is certified by the Secure Server Certification Authority. We only disclose the last four digits of your credit card number when confirming a booking, or when processing online purchase transactions.

It is important to note that email communications are not secure. There is a risk inherent in the use of email. Please be aware of this when requesting information or sending forms via email (for example, from the "Contact Us"



section of our website). We recommend that you do not include confidential information (namely, information related to a credit card) in your emails. For your protection, our e-mail responses will not contain any confidential data.

Finally, to be prudent, please make sure to close your browsers whenever you have finished using a form or the booking site. Although the session ends after a short period of inactivity, it is best to close your browsers immediately when you have finished. Please make sure you choose secure login credentials when setting up your account, and protect yourself from unauthorised access to your password and computer.

8. How long do we keep your data?

Your personal data will be kept for as long as necessary for the purposes set out above, or in accordance with applicable law. If you are resident in the European Economic Area.

We may store your personal information anonymously, which will not link to you, for statistical purposes without time limits, insofar as we have a legitimate and lawful interest in doing so.

9. Information about children

This section is for parents, guardians, and children under 16 years of age.

If you are under the age of 16, please ask your parents or guardian for permission before using any of our services, including our website, apps, and other services, since they are mostly not directly aimed at children.

We will ask parents and guardians for information about their children, such as their name, age, gender and preferred language, so that we can identify all of our customers. This information will also help us prepare for the arrival of the children. When children use our services such as WiFi, we will receive information about this for billing purposes. Images of children may also be recorded by our security cameras. We have a legitimate interest in processing this information as explained in paragraph 3.

We may also ask parents and guardians about the interests of their children. With the consent of the parent or guardian, we can send the children information about fun activities and events that occur during their stay with us. If you are under 16, when you receive information from us, always consult your parents or guardians before making a decision.

We will keep the information about your children so that we can recognise them and know their preferences during their future stays with us. If you are under the age of 16 and have doubts about these things, ask your parents or guardian to let us know. We will remove information about you unless we have a legal reason to keep it.

10. Your rights

Where European data protection laws apply, and you are a data subject whose personal data is processed by us, you have certain rights in connection with your personal data, as described below. In these circumstances, you can exercise your rights by sending us an email to flat@midi33.be for any request for withdrawal of consent / cancellation of subscription, or by calling +32 (0) 2 511 2838.

Compliance with the access requests of the persons concerned is subject to certain restrictions and exceptions, and is subject to the rights of other individuals. The application must clearly indicate that it is a SAR. You may also be required to provide proof of your identity and payment, when necessary. Flat Hotel Midi 33 will endeavour to respond to any request for access within one month, or as otherwise required by law.

Right to rectification. Data subjects may request that we correct any inaccurate or incomplete personal data.



Right of withdrawal of consent. Data subjects may at any time withdraw their consent to the processing of their personal data carried out by us on the basis of their prior consent. Such withdrawal will not affect the legality of the processing based on this prior consent. Please note that if you withdraw your consent, you will no longer be able to benefit from certain service features for which the processing of your personal data is necessary.

Right to oppose processing, including profiling. We comply with valid opposition requests unless we have a legitimate and overriding compelling reason to continue our processing, or we have another legal reason to refuse the request of the person concerned. We will comply promptly with any valid refusal to participate in marketing communications. Flat Hotel Midi 33 will endeavour to respond to your request within 72 hours. However, it may take up to 7 days to remove your profile from our systems.

Rights related to automated decisions about you. When we make a decision based exclusively on automated processing, and it significantly affects the person concerned, the person concerned has the right to challenge the decision, to express his or her point of view and to obtain a human intervention.

Limitation. Data subjects may request that we limit our processing of their personal data under different circumstances. We will comply with their request, unless a legal reason prevents us from doing so, such as a legal obligation to continue processing their personal data in a certain way.

Right to erasure. Data subjects may ask us to erase their personal data and we will comply with it unless there is a legal reason preventing us from doing so. For example, there may be a legitimate and overriding reason for the retention of personal data, such as a legal obligation to respect, or if their retention is necessary to comply with our legal obligations.

Right to data portability. In certain circumstances, data subjects may request the data controller to provide a copy of their personal data in a structured, commonly used, and machine-readable format, and to transfer it to another, identical or similar service provider. To the extent that this applies to our services, we will comply with such transfer request. Please note that the transfer to another provider does not imply the erasure of your personal data.

Right to lodge a complaint with the supervisory authority. We suggest you contact us regarding any question or if you have any complaints about our handling of your personal data. However, each person affected has the right to contact the relevant supervisory authority directly. A list of the relevant supervisory authorities is available here.

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