

## **Privacy Statement Social Hotspot - End Users**

Social Hotspot takes your privacy very seriously and will process and use information about you (the data subject) in a secure manner. In this Privacy Statement we explain which data we process and for which purpose we do so. In addition, in this Privacy Statement you can read about your rights regarding our processing of your personal data. We encourage you to read this Privacy Statement carefully. For questions you can always contact [info@socialhotspot.nl](mailto:info@socialhotspot.nl).

### *Who is Social Hotspot?*

Social Hotspot is the company under Social Hotspot, having its office at (1216 GK) Hilversum at Zeverijnstraat 6, registered in the trade register of the Chamber of Commerce under number 56411197. When Social Hotspot processes your personal data, Social Hotspot is the controller.

### *How does Social Hotspot use your data?*

Below you will find an overview of the purposes for which Social Hotspot processes personal data about you. In doing so, it is always indicated which data Social Hotspot uses for that specific purpose, which is the legal basis for processing this data and for how long the data is stored by Social Hotspot. To keep things organized, we have grouped everything by type of data stream.

### **Website**

Purpose: Website analytics

Data: Surfing behavior, Location, MAC address

Basis: Justified interest

Relevant interest: Commercial interest

Storage period: 2 months

Purpose: A / B testing

Data: Surfing behavior, MAC address

Basis: Justified interest

Relevant interest: Commercial interest

Storage period: 2 months

### **Service**

Purpose: Handling complaints

Data: Name, E-mail address, Telephone number, Content of the complaint, Company details

Basis: Implementation of the agreement

Retention period: As long as necessary for this purpose

Purpose: Provide internet access via Social Hotspot's WiFi network

Data: E-mail address, Public profile details - Facebook: gender, age, profile picture (URL), e-mail address, place of residence, likes, date of birth, location check-in

Basis: Justified interest

Relevant interest: Commercial interest

Storage period: 2 months

### **How do we obtain your personal data?**

Social Hotspot has data about you because you have provided that information to us.

### **What are your rights?**

Under the European General Data Protection Regulation you have a number of rights with regard to your data and their processing:

*Insight:*

You can always view your own (personal) data and change it in your account if necessary. If you want to see the personal details that have been recorded about you at Social Hotspot, you can request access.

#### *Modify*

If you wish to make changes to the personal data that you have seen as a result of a request for access and that you can not change yourself in your account, you can request this at Social Hotspot. You can request that Social Hotspot modifies, corrects, supplements, deletes or screens your data.

#### *Limiting the processing*

You also have the right, under certain conditions, to request Social Hotspot to limit the processing of your personal data.

#### *Right to object*

If a certain processing takes place on the grounds of the 'legitimate interest' of Social Hotspot or a third party, you have the right to object to that processing.

#### *Data transfer*

You have the right to obtain your personal data from Social Hotspot. Social Hotspot will provide this in a structured and current form, which can easily be opened in other common digital systems. This way you can also transfer your data to another provider.

#### *Right to revoke consent*

In all cases in which the basis for a certain data processing is your consent, you have the right to revoke that permission. This has no consequences for the past, but does mean that we will no longer be allowed to process this data. It may be that Social Hotspot can no longer provide you with certain services.

#### **Reaction by Social Hotspot**

Any request concerning your personal data can be sent to [info@socialhotspot.nl](mailto:info@socialhotspot.nl). Social Hotspot will grant your request as soon as possible and in any case no later than one (1) month after Social Hotspot has received such a request. If Social Hotspot rejects your request, we will indicate in our answer why the request is rejected.

#### **Recipients of personal data**

The data can be passed on to:

- Processors, to implement or support the services of Social Hotspot. A processor agreement has been concluded with these processors.
- Parties that are involved in the execution or fulfillment of an agreement between you and Social Hotspot
- The locations, such as hotels and restaurants, where Social Hotspot offers its services. Transfer to these parties will only take place if you have given permission for this.

It may be that Social Hotspot is obliged to provide your data to a third party on the basis of a legal obligation. Transfer to third countries or international organizations. For (for example) technical and operational reasons, it may be necessary for your (personal) data to be passed on to companies affiliated with Social Hotspot outside the European Economic Area. Because the privacy protection regulations there may not offer the same protection as within the European Economic Area, Social Hotspot will use the Privacy Shield or the EU Model Clauses to protect your privacy as much as possible. If that is not possible, Social Hotspot will ask you for permission to pass on your (personal) data to countries without an adequate level of protection. You can withdraw this permission at any time.

#### **What are cookies and how does Social Hotspot use them?**

Cookies are small pieces of (text) information that are sent to your browser when you visit the Social Hotspot website and then on the hard drive or in the memory of your computer, tablet, mobile phone or other device (hereinafter: "Device"). ) being saved. The cookies placed via the Social Hotspot website cannot damage your Device or the files stored on it. When we talk about 'cookies', we mean not only these small pieces of (text) information, but also comparable techniques with which information is collected, such as device fingerprinting.

**Can this Privacy Statement be changed?**

This Privacy Statement can be changed. We therefore advise you to regularly read the Privacy Statement for any changes.

**Where can you go with complaints and questions?**

If you have any questions about this Privacy Statement and the way in which Social Hotspot uses your data, you can send an e-mail to [info@socialhotspot.nl](mailto:info@socialhotspot.nl). Even if you have a complaint about the way Social Hotspot processes your data, you can send an e-mail to [info@socialhotspot.nl](mailto:info@socialhotspot.nl). You can also contact the competent national supervisor in the field of privacy protection. In the Netherlands this is the Dutch Data Protection Authority.