

## Privacy policy -GuestXP

### 1. Introduction to this policy

Guest XP AB, reg. no. 559545-9016 (referred to as “**GuestXP**”, “**we**”, “**our**”, “**us**”), is responsible for the processing of personal data that takes place when we process personal data on behalf of ourselves in order to provide our Service to our Customer, which is regulated herein. By accepting this privacy policy, you consent to the processing described herein. If you have any questions or comments regarding our processing of personal data, you are always welcome to contact us directly through the contact details below;

Postal address: Kungstorget 7, 411 17 Göteborg

E-mail address: support@guestxp.io

It is in our best interest to handle your information as safely as possible. We care about your privacy and want to explain here how we process your personal data. Below is our privacy policy, which describes how we handle information about you as a Guest after you have consented to such processing.

We provide a service that will enable our customers within the hospitality industry to adjust, tailor and offer great experiences to you. By letting us use your personal data in accordance with this policy, we will be able to create a profile of you – which then will be shared with our customers for the purpose of providing you with a stay and experience that is as good as possible.

### 2. Personal data and data controller

In order to make this policy easier to understand, we have defined some important terms that are being used in the policy.

**“Personal data”** means any information that can directly or indirectly identify a natural living person. Personal data can be, for example, name, telephone number, e-mail address and address, but also other information that can be linked to a physical living person. Processing personal data includes any action taken, such as storage, collection, processing and destruction.

**“Processing”** (and similar words such as “process”) means any action taken, such as use or handling, by us in relation to personal data. The processing may either be automatic or manual.

**“Data controller”** means the person who is responsible for certain processing of personal data and thus determines the purposes of the processing. We, Guest XP AB, are the data controller for the personal data that we process on our own account, and the purpose of this Privacy Policy is to describe such processing.

**“Guest”** means you, when you visit or purchase services or goods from our Customer.

**“Profile”** means the profile of you that is created by us using your personal data (gathered in accordance with what is described below), and which we may share with our Customers. When sharing your Profile (and thereby your personal data) with our Customers, we may share only parts of such Profile or the full Profile.

**“Customer”** means a hotel or other service provider within the hospitality industry which you visit or from which you buy other services, and to whom we provide our Service.

**“Service”** means the service provided by us to our Customers, being a “guest experience and loyalty platform” provided with the aim to enhance our Customer’s possibility to adjust and improve your stay and interaction with them. For you as a Guest, this means that we will be able to present as accurate data as possible to our Customers, but also to give them suggestions on what to offer and provide you to make your stay as good as possible.

### 3. Processed data, why it is being processed and on which legal basis

Below we describe what personal data we process, the purpose of our personal data processing and on which legal basis it is processed. We may also process your personal data if you contact us for the purpose of managing such contact. The personal data we then process are those you provide to us, and we will process the personal data in accordance with applicable laws and regulations.

The data below is processed by us as the controller (should we or our Customer have received your consent for our own such processing). Where we process personal data as a processor on behalf of our Customer, we refer to our Customer for details of how such processing is carried out, for what purpose and on what legal basis.

Personal data	Purposes of processing	Legal basis
<u>Booking information</u>  When you book a stay with or check in with our Customers, we receive certain information about you that you share with our Customer upon your booking, such as job information, name, home address, country, phone number, date of birth, gender, date(s) of your visit with the Customer, services purchased from the Customer, reasons why you made the booking and passport number.	Creation and administration of your Profile  Communication regarding the Service via the Service and email  Marketing messages  Sharing with our Customers that you are visiting  Gathering of open information from social media and third parties  Storage and analysis of Guests  Conclude whether you are visiting our Customer privately or in work  Identify you in relation to a booking with our Customer	<i>Consent.</i> Consent gathered through our Customer. The processing is necessary to be able to provide our service to our Customer and facilitate the opportunity to make your stay with them as good as possible.
<u>Information from Customer</u>  When you interact with our Customers, we receive certain information about you that our Customer gather and creates, such as notes about your stay and preferences, details about your purchases before, during or after your stay, NPS-score, room name, your requests, whether you used online check-in and when you checked in.	Creation and administration of your Profile  Communication regarding the Service via the Service and email  Marketing messages  Sharing with our Customers that you are visiting  Storage and analysis of Guests	<i>Consent.</i> Consent gathered through our Customer. The processing is necessary to be able to provide our service to our Customer and facilitate the opportunity to make your stay with them as good as possible.
<u>Information from other third parties</u>  When your Profile is created, we gather personal data about you from other third parties (e.g. social media and third	Creation and administration of your Profile  Communication regarding the Service via the Service and email  Marketing messages	<i>Consent.</i> Consent gathered through our Customer. The processing is necessary to be able to provide our service to our Customer and facilitate the opportunity to make your stay with them as good as

party booking services), such as photographs, job data, marital status, income level, email addresses and other contact details.	Sharing with our Customers that you are visiting Storage and analysis of Guests	possible.
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In addition to the above, we will use your personal data for analyses with the purpose of developing insights about you and your visit with our Customers in order to create and enrich your Profile. The purpose of this is to gain a better understanding of behaviors, patterns and preferences, in order to share such insights with our Customers, which will help them adjust and tailor the services they provide specifically for you. We may conduct profiling of your data for these purposes. However, we will not conduct any profiling for automated decision-making that has legal consequences or otherwise affects you to a significant degree.

#### **4. Data retention**

We will keep your data until you withdraw your consent or as long as possible to fulfill the purpose of our processing, however for a maximum of five (5) years after your last stay with one of our Customers]. We will however, delete inaccurate personal data as soon as we become aware of such data being inaccurate.

#### **5. Sharing data with Customers**

When you make a booking or otherwise interact with one of our Customers, and we are able to match your Profile with such booking/interaction, we may share your personal data with such Customer. Such Customer will then also be the data controller of such personal data, and you consent to them processing your personal data in accordance with their applicable terms and conditions and policies.

#### **6. Data processors**

From time to time, we may need to share your personal data with persons outside our organization as our data processors, such as our consultants, suppliers, our group companies, counterparties in litigation, public authorities, potential purchasers of the Company and investors, and, if applicable, their respective employees, consultants and advisors. We never share more data than is necessary taking into account the purposes of the processing or what is required for such third parties to fulfill their obligations to us and for the fulfillment of the purposes of our processing as set out above.

We choose our suppliers with great care and enter into data processing agreements with all of them (other than for service agreements), whereby they may only process personal data in accordance with applicable law and our instructions. We may from time to time subcontract or use third party tools for certain purposes, such as server management.

We may also be required to share your personal data with authorities that have the role of independent data controllers. If an authority is an independent controller, this means that we cannot control how the information provided to the authority is processed. Independent controllers with whom we may need to share your personal data in accordance with legislation or on suspicion of crime include the Police Authority and the Tax Authority. When your personal data is shared with an authority that is an independent controller, that authority's privacy policy and personal data processing applies.

#### **7. Your rights and complaints**

You have the following rights as we process your personal data (as detailed in the GDPR):

- (i) You have the right to:
  - (a) access the personal data that we process about you;
  - (b) if any of the data is inaccurate and/or incomplete, have it rectified or completed;
  - (c) object to the processing of your personal data;
  - (d) require us to erase the personal data we process about you; and/or
  - (e) require us to restrict our processing of your personal data.
- (ii) You have the right to exercise your right to data portability.
- (iii) If our processing of your personal data is based on your consent, you have the right to withdraw that consent (in relation to future processing).

If you wish to exercise your rights, please contact us via the contact details listed in point 2 above. Please note that the rights listed above are not unlimited and are applied in accordance with the GDPR. For example, your right to invoke the rights listed above may be limited to the extent that we are required to process your personal data (i) under EU law or the national law of an EU Member State, or (ii) to perform a task carried out in the public interest.

You also have the right to complain about how we process your personal data if you believe it is not done in accordance with applicable law. You can do this by contacting the Data Protection Authority at [imy@imy.se](mailto:imy@imy.se). Other contact information for the Data Protection Authority can be found here: <https://www.imy.se/om-oss/kontakta-oss/>.

## **8. Protection of personal data**

We have implemented a high level of security to protect your personal data. Only authorized employees have access to personal data, and we comply with both legal obligations and our internal data protection guidelines.

## **9. Changes to the privacy policy**

We may make changes to this Privacy Policy. The latest version of the policy is always available [guestxp.io/privacypolicy](https://www.guestxp.io/privacypolicy). You will also receive written information about such updates which will be sent to your e-mail address.