



# DATA PROTECTION AND PRIVACY NOTICE

(26-07-2018 version)

## 1. INTRODUCTION

The processing of personal data is submitted to compliance with the law, currently the Belgian law of 8 December 1992 and the European regulation n°2016/679 of 27 April 2016 on data protection, known as "GDPR" or any other legislative act modifying them.

Data protection and privacy is of very important for LPM Sporthotel. We are committed to protect and process your personal data in accordance with the law and in a fair and transparent manner.

This statement helps you understand our data protection practices. We invite you to read it carefully.

The purpose of this statement is to explain to you how LPM Sporthotel collects, uses and retains personal data relating its customers and to any person in contact with LPM Sporthotel.

This declaration is also intended to inform you about the purposes of the processing of your personal data, the duration of their retention and the rights you can exercise against this data.

By "data", LPM Sporthotel aims to all personal data concerning the customer, namely any information relating to a person that allows to identify him/her directly or indirectly.

## 2. PROCESSING MANAGER

The processing manager is LPM Sporthotel, its registered office is in Rue d'Andenne, 2 - 6940 Durbuy. LPM Sporthotel thus responds to the supervisory authorities, namely the Commission for the Protection of Privacy (soon to be called the Data Protection Authority), in compliance with the regulations regarding your data. It is LPM Sporthotel that determines the purposes for which your data is processed, the means implemented and all the characteristics of the treatment, explained in this statement.

"Data processing" means any operation on your personal data, whether it is collection, registration, organization, storage, adaptation or modification, retrieval, consultation, use, communication by broadcast or any other form of provision, reconciliation or interconnection and archiving, erasure or destruction.

For certain services, LPM Sporthotel may use specialized companies that will process your data on behalf of LPM Sporthotel and according to the instructions of LPM Sporthotel, in accordance with this statement. Only the strictly necessary data are transmitted to these companies.

If you have any questions, you can contact our Data Protection Officer ("DPO") by writing to the following address: Rue d'Andenne, 2 - 6940 Durbuy or by sending an e-mail to [dpo@lpm.be](mailto:dpo@lpm.be).

## 3. CATEGORIES OF DATA PROCESSED

LPM Sporthotel may be required to process information, data and information of any kind, provided by you or by third parties, to the extent that the processing of such information is necessary or useful for the performance of LPM Sporthotel's activities.

The personal data relating to the customer are, especially, those relating to his identity or his home. These data are communicated to LPM Sporthotel when the customers deliver or send to LPM Sporthotel a form or printed document or a request, whatever the manner ; or in any other way (for example: by mail, phone, email ...).

#### Data categories:

- Customer identification data : this data is provided by you and processed when you request information or become a customer. This includes, for example, your name, address, date of birth, phone number, e-mail address.
- Data about your habits and preferences : these data come from choices you made during the reservation (for example a specific diet).
- Video recordings : data from video surveillance systems collected for the purposes of proof or control. Our surveillance cameras are located in and around our hotel.

LPM Sporthotel does not deal with so-called sensitive data, that is, information about your racial or ethnic origin, political opinions, philosophical or religious orientation, or data about health, life, or sexual orientation.

#### **4. FINALITIES OF DATA PROCESSING**

LPM Sporthotel collects and processes personal data for the purposes described below. These goals are determined by LPM Sporthotel, for the purpose of its activities. Only the necessary data and relevant for a given purpose will be processed.

#### Finalities :

- To respond to a request sent via an online form, whether for any inquiry, reservation or complaint ;
- To send a booking confirmation ;
- To send an invoice ;
- For customer management and the production of statistics ;
- To ensure compliance with security obligations ;
- To be able to notify any change of the privacy policy ;
- To allow prosecution in case of damage to the equipment or accommodation.

When processing your personal contact information, namely your telephone number and your e-mail address, LPM Sporthotel will ask you, in advance, your consent to send you information, advertisements or personalized proposals through direct marketing actions or newsletters.

#### **5. RIGHTS IN PROCESSING YOUR DATA**

##### 5.1. Right of access, modification and erasure

You have the right to access the data concerning you from LPM Sporthotel. You can therefore ask us whether LPM Sporthotel deals with your personal data, for what purposes it is processed, what categories of data are processed, to which recipients they are communicated and the origin of these data.

If you find that your data is inaccurate or incomplete, you can ask us to correct it.

You also have an erasure right in certain specific cases and for certain data. At the conclusion of the LPM Sporthotel contract, you may request that LPM Sporthotel stops using your personal information, even though it may retain your past data, when necessary for evidentiary purposes.

### 5.2. Right of opposition

You have the right to object to certain treatments of your personal data, such as the use of your data for marketing purposes. However, you may not be able to object to any processing that may be necessary to fulfill a contract with LPM Sporthotel to comply with a legal or regulatory provision to which LPM Sporthotel remains subject.

### 5.3. Exercising your rights

You may exercise your rights by a written, dated, signed and co-signed application with a copy of your ID to our Data Protection Officer ("DPO") by writing to the following address: Rue d'Andenne, 2 - 6940 Durbuy or by sending an e-mail to [dpo@lpm.be](mailto:dpo@lpm.be).

## **6. DURATION OF DATA CONSERVATION**

LPM Sporthotel makes sure not to store your personal data beyond the time required for the processing for which it was collected and for a maximum of 5 years to meet legal and tax obligations. At the end of this period, your data are deleted or anonymized.

## **7. SECURITY OF YOUR PERSONAL DATA**

Personal data are stored exclusively on servers located within the European Economic Area (EEA) or with a subcontractor guaranteeing a sufficient level of data protection.

LPM Sporthotel protects the personal data collected under its control by technical and organizational protection measures such as encryption, anti-virus, firewalls, access controls.

Access to your personal data is in any case only accessible to authorized persons, for whom this access is necessary for the accomplishment of their mission. These persons are held at a professional discretion and must respect all the technical prescriptions provided to ensure the confidentiality of personal data.

If, however, there is a violation of the security of your data, LPM Sporthotel will take all necessary steps to quickly identify the cause of the violation to remedy it. If necessary, in accordance with applicable law, LPM Sporthotel will inform you of this incident.

## **8. SUBMIT A COMPLAINT**

In the event of any dispute regarding the processing of your personal data, you may address a complaint to our Data Protection Officer ("DPO") by writing to the following address: Rue d'Andenne, 2 - 6940 Durbuy or by sending an e-mail to [dpo@lpm.be](mailto:dpo@lpm.be).

You can also submit a complaint to the Commission for the Protection of Privacy by post at Rue de la Presse, 35, 1000 Brussels, by e-mail at [commission@privacycommission.be](mailto:commission@privacycommission.be) or by phone at 02 / 274.48. 00.