

## HOTELLINX CLOUD – PRIVACY AND DATA PROTECTION, GDPR

### General and definitions

Hotellinx Cloud, developed by Hotellinx Systems Ltd, is a cloud-based service (SaaS) for hotel management, which includes technical maintenance and software updates. The Hotellinx Cloud customer databases are located on cloud-based servers, maintained by Hotellinx Systems Ltd. Hotellinx is responsible for technically maintaining the software and keeping it up to date for each customer. Regarding security and data protection, Hotellinx is responsible for protecting its servers, software and databases and access to these appropriately.

Personal data registered and handled in Hotellinx Cloud are data related to reservations. The customer is responsible for this data and for justifying why and how the data is handled and why a register has been created. The customer is also responsible for how the software is used, how personal data is handled and for the ultimate data protection. Personal data related to reservations is based on the relationship between the customer and their guests and the customer decides for how long they store data. Rules for how long different types of data are saved can be set in the program and personal data will automatically be deleted after the time set, unless the person in question still has active reservations. The customer can also delete personal data from the system if a guest so requires. Credit card details are stored in an encrypted format and automatically deleted 30 days after the reservation end date. Accessing credit card details requires a special login.

### Software usage protection

Hotellinx Cloud is installed on the customer's workstation(s). The installation is password protected and once the software has been installed, a special key is required in addition to the installation password in order to get access to the own database. This key is stored in an encrypted format and not shown on screen. Finally, signing in to the system requires a user name and password. User passwords are stored in an encrypted format and not shown on screen. Hotellinx services with access to databases stored on the Hotellinx server can only be used through the Hotellinx software. The databases cannot be accessed directly.

### Physical and data technology protection

Hotellinx Cloud databases are stored on servers located within the EU and protected using commonly accepted safety methods, including for example firewalls and virus protection as well as passwords. In addition, database servers and servers running Hotellinx services and other software are protected through access control. Browser-based Hotellinx Cloud modules, such as NetReservations and Housekeeping, are running on servers with SSL security protection.

### Confidentiality

Hotellinx treats all their own customer data as well as data belonging to guests stored by their customers as confidential and will not reveal any details about users, guests or any other data stored in their customers' databases. All Hotellinx employees with access to customers' guest and other data are required to agree to this non-disclosure policy.

### Disclosure of customer data

Hotellinx does not disclose any customer data to any third party, with the exception of upon requests made by official authorities. Databases and software are stored on third-party servers, located within the EU. The associate maintaining the servers fulfils the GDPR data protection and data safety requirements.

**Customers' own customer registers – administration and responsibility**

Hotellinx customers handle their own customer register themselves in the Hotellinx Cloud software. That is, administering the register and deciding what data to store for what purposes and for how long, is entirely each customer's own responsibility.

**Data ownership**

Hotellinx does not use, sell or own the data that their customers store in their own Hotellinx Cloud database, but the data is 100% owned by the customers themselves and the responsibility for administering their registers is also with the customers themselves.

**Data disclosure to and data storage in countries outside the EU or EFTA**

Hotellinx does not disclose to or store data in countries outside the EU or EFTA.