

# Privacy & Cookie Statement

Last updated: 20 June 2024

## Summary

### **We take our obligation to protect your privacy seriously!**

That's why we provide you with this 2-minute-read summary, including the necessary information on how we process your Personal Data.

### **What you should know**

First of all: you always remain the sole owner of your data.

### **What information do we collect about you?**

- When you create a user profile, we may collect your contact details, such as your name, birth date, picture, language, email address, phone number, address, country, postal code. We also may collect your special needs regarding dietary restrictions and/or accessibility requirements or other special needs or your preferences around the products or services used during your stay within the accommodation selected.
- By contacting us through any medium, we collect information about the communication you had with ExpectMe, including content and technical details.
- Finally, we use cookies to collect information about your use of our Platform.

### **Why do we collect this information?**

- To establish and/or maintain our contractual relationship.
- To provide you with the requested services and information.
- Finally, to improve our website and our services.

### **Who has access to your data?**

- Only a specific part of ExpectMe's trustworthy team has access to the information you provide us with.
- Furthermore, we use some suppliers and service providers, such as but not limited to computer security, digital solutions and web hosting services. These parties are legally obliged to ensure your privacy at all times, and will only process data in accordance with our purposes.
- Finally, it may happen that a third party is commissioned to process data. However, they can only do this for aforementioned purposes and upon our instructions and signature of a data processing agreement.

### **What do you control?**

- You can ask us at any moment to modify or erase your data. To do so, send us an email to [privacy@expect-me.com](mailto:privacy@expect-me.com) and follow the procedure as described in our entire Privacy Statement under Article 5.07.
- Also, you can always request a copy of all the information we collected about you by sending an email to the same address.

### **What do we do to protect your data?**

- We adopted the required safety measures on a technical and an organizational level.
- Your data is stored on high-security servers from Amazon within the European Union, and more specifically, Frankfurt (Germany).
- In order to improve our services, solutions, Website, and/or platform, ExpectMe may use the data you provided to it. However, at all times, ExpectMe shall use this data in a GDPR-compliant form, using its state-of-the-art and patented software and solutions.
- We have implemented internal procedures to ensure the confidentiality of our IT infrastructure and to make sure it is managed responsibly.

If you want to know more: we invite you to read our entire Privacy Statement, where everything is explained in detail.

## Privacy Statement

ExpectMe makes it a matter of utmost importance to respect the privacy of our users, and we are committed to treating your Personal Data with the strictest confidentiality, in accordance with the data protection legislation in force, the present Privacy Statement (hereinafter the "**Privacy Statement**"), and the applicable standards of fair information practices.

This privacy statement is intended to inform you, in a transparent manner, about the data we collect, the purpose for collecting it, the way we use it, and the rights you have regarding the processing of such data.

This statement applies specifically to the users of our "**Services**" being the services offered, following and linked our Website ([www.expect-me.com](http://www.expect-me.com)), and/or the "**Platform**".

You are not obliged to provide us with your Personal Data, however, understand that we are not able to provide you with our Services in case you refuse to provide us with certain Personal Data.

Further, we will share the data you provided to the accommodation you have selected.

ExpectMe reserves the right to change, modify and update this Privacy Statement from time to time by posting a revised version on the Platform or Website. Therefore, we recommend you regularly consult this Privacy Statement to make sure that you are aware of all changes.

If you have any other questions, do not hesitate to contact us at the following address: [privacy@expect-me.com](mailto:privacy@expect-me.com).

### Article 1. General

- 1.01** EXPECT ME bv, (hereinafter, "**we**", "**us**", "**our**", "**ExpectMe**"), with registered office in Belgium, Sint-Pietersvliet 7, 2000 Antwerpen, and registered at the Crossroads Bank for Enterprises with number 0758.797.643, takes responsibility for the processing of your Personal Data as a "**data controller**", with regard to the use of the ExpectMe Services, such as the creation of a user profile for the ExpectMe Services and sharing the accommodation you have selected ([www.expect-me.com](http://www.expect-me.com)).
- 1.02** ExpectMe processes Personal Data in accordance with the legislation in force, and, in particular, Regulation 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data, applicable from 25 May 2018 (hereinafter the "**GDPR**").
- 1.03** The access to or use of our Website ([www.expect-me.com](http://www.expect-me.com)) the use of our Services, implies your full and unreserved acceptance of this Privacy Statement as well as its General Terms of Use and the Cookie Policy. This means that you fully agree to how ExpectMe collects, uses, and processes your Personal Data.
- 1.04** You acknowledge having read the information below and authorize ExpectMe to process, in accordance with the provisions of this Privacy Statement, the Personal Data that you communicate to us, for the provision of our products and/or services.
- 1.05** This Privacy Statement is only valid for the pages hosted on our Website and for the products and/or Services we offer in accordance with our Terms of Use. It is not valid for the pages hosted by any third party to which ExpectMe may refer to and whose privacy policies may differ. ExpectMe will therefore not be held responsible for any data processed on these third-party websites or by them.

## Article 2. What personal data does ExpectMe collect?

**2.01** Hereby, you allow, in particular, ExpectMe to process, for the purposes mentioned in article 3, the following categories of Personal Data:

	Data	Details	Context
<b>Category 1</b>	Your user details	<ul style="list-style-type: none"> <li>▪ Your contact details, such as your name, birth date, picture (optional), language, email address, phone number, address, country, postal code;</li> <li>▪ Your special needs regarding dietary restrictions and/or accessibility requirements;</li> <li>▪ Other special needs that you decide to share with us.</li> <li>▪ Your preferences around the products or services used during your stay within the accommodation selected.</li> </ul>	<ul style="list-style-type: none"> <li>▪ By creating your user profile, and/or using our Services or/and our Platform.</li> </ul>
<b>Category 2</b>	Your communications through our Services	<ul style="list-style-type: none"> <li>▪ Information about the communication you had with ExpectMe or through the Platform and/or Services, including technical details and content, e.g. when you had a problem with the Platform and/or Services and asked for support, or when you communicate with ExpectMe via the Platform, ...</li> </ul>	<ul style="list-style-type: none"> <li>▪ By contacting us, via telephone, email or any other communication service;</li> <li>▪ By making use of our Platform and/or Services and communicate in that context with us.</li> </ul>
<b>Category 3</b>	Information about your usage of our Services	<ul style="list-style-type: none"> <li>▪ By accessing our Website and using our Platform and/or Services, the servers consulted automatically record certain data, by placing cookies.</li> <li>▪ Information relating to more “technical” aspects of your use of the Platform and/or Services, e.g. your IP-address (also without registration), which version of the Platform you use, ...</li> </ul>	<ul style="list-style-type: none"> <li>▪ By placing cookies (see Our Cookie Policy)</li> </ul>

### Article 3. The purpose of data processing

We process your data in order to offer you our best possible services while handling your needs. For each purpose, only the data relevant to the pursuit of the purpose in question are processed. The processing consists of any operation (manual or automated) on Personal Data ExpectMe collects, stores, and uses your data for the following purposes, in particular:

#### 3.01 General purpose

	Legal basis	Purpose
<b>Category 1</b>	Necessity for the performance of the agreement we have entered or are about to enter into with you as a party;  and/or – where applicable - Explicit Consent.	In order to manage your user profile on the Platform and to make sure you can enjoy the Platform and the services related to the Platform fully, based on the execution of the agreement which you requested.  In order to manage your user profile on the Platform and to make sure you can enjoy the Platform and the services related to the Platform fully, based on your explicit consent.
<b>Category 2</b>	Necessity for the performance of the agreement.	Communications through our Services will be processed by ExpectMe to ensure that you can make optimal use of the Services (in accordance with the execution of the agreement).
<b>Category 3</b>	Your consent;  Legitimate interest to improve Our Website and Our Services.	<ul style="list-style-type: none"> <li>▪ to facilitate the availability and use of the Services and/or Platform and the Website;</li> <li>▪ to analyze, adapt and improve the content of the Services and/or Platform and the Website;</li> <li>▪ to personalize your experience on the Services and/or Platform and the Website;</li> <li>▪ to maintain and improve the security of the Platform and/or Services;</li> <li>▪ to create statistics.</li> </ul>

#### 3.02 Direct Marketing

Your Personal Data will only be used for direct marketing purposes, based on your consent or based upon our legitimate interest.

Your Personal Data will not be used for direct marketing purposes for any services that would not be identical or similar to those to which you have already subscribed, unless you have previously explicitly consented to such use by ticking the boxes provided for this purpose ("opt-in").

When you give us your consent to use your Personal Data for direct marketing purposes, you also retain the right to revoke such consent at any time, upon request and free of charge. You may simply communicate your request by clicking the unsubscribe button below every promotional email or by writing to us via the following email address: [privacy@expect-me.com](mailto:privacy@expect-me.com).

#### 3.03 Transfer to third parties

First of all, We will share the data you provided to the accommodation you have selected in order to provide you the ExpectMe Services.

ExpectMe treats Personal Data as confidential information and will not disclose or communicate them to third parties under any condition other than those specified in this Privacy Statement, to achieve the objectives pursued or under the conditions in which the law requires it to do so.

ExpectMe may communicate your personal information to third parties to the extent that such information is necessary for the performance, execution, and management of a contract with you, including but not limited to reporting, support, marketing, computer security, or offering specific other services. In such case, these third parties will not communicate this information to other third parties, except in the following situations:

- the communication of this information by such third parties to their suppliers or subcontractors is necessary for the performance of the contract;
- such third parties are obliged by the regulations in force to communicate certain information or documents to the competent authorities.

The communication of this information to the aforementioned third parties shall, in all circumstances, be limited to what is strictly necessary or required by the applicable regulations.

ExpectMe will not sell, hire out or pass on your Personal Data to third parties, except in the situations described in this Privacy Statement or unless you explicitly provide your prior consent.

### 3.04 Legal requirements

In extraordinary circumstances, it may occur that ExpectMe is obliged to transfer your Personal Data following a court order, or in order to comply with imperative laws and/or regulations. ExpectMe will, if reasonably possible, try to inform you beforehand, unless revealing this information is subject to legal constraints.

## Article 4. The storage period

ExpectMe will store your Personal Data for the duration necessary to achieve the objectives pursued (see article 3.01), or for as long as this is essential for the contractual relationship.

ExpectMe may also store your Personal Data after the termination of the contract, in order to comply with all applicable laws or as part of legal requirements.

	Retention period
<b>Category 1</b>	We will store and process your personal data for the period we're legally obliged to do so, or for as long as this is essential for the purposes of the processing, or the contractual relationship between you and ExpectMe. Therefore, we keep a record of your data for as long as your user profile is active, or if your personal data is necessary to offer you a particular service. Additionally, in certain circumstances we might retain a limited amount of information for the period it would be of vital importance to maintain the security of our Services.
<b>Category 2</b>	We keep your communications through our Services as long as it is necessary to communicate with you, which is never longer than three years after the first request or contact. In case of a contractual relationship, we will not keep your communications through our Services longer than five (5) years after the end of the contractual relationship or our last communication.
<b>Category 3</b>	With regards to cookies the retention period may vary depending on the specific cookie, ranging from end of the session to 2 years.

## Article 5. Your rights

### 5.01 Right of access and right to obtain a copy

The right to freely obtain access to Personal Data, as well as to be informed about the purpose of the processing, at any moment.

#### **5.02 Right to rectification, erasure, or restriction**

The right to request the restriction of processing of your Personal Data, if you think your data is inaccurate and you subsequently notified us about it or its erasure.

#### **5.03 Right to object**

The right to object to the processing of your Personal Data when you have serious and legitimate reasons to do so and the right to object to its use for direct marketing purposes.

#### **5.04 Right to data portability**

The right to obtain your Personal Data, which is processed by ExpectMe in a structured, commonly used format and/or to transfer this data to another data controller.

#### **5.05 Right to withdraw consent**

When the processing is based on prior consent, you have the right to withdraw this consent.

#### **5.06 Automated decisions and profiling**

The right to request not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

#### **5.07 Exercising your rights**

You can exercise your rights by contacting us with a copy of the essential parts of your ID, such as name and date of birth, as an attachment,

either through email to: [privacy@expect-me.com](mailto:privacy@expect-me.com)

or via ordinary mail to: EXPECT ME bv  
Sint-Pietersvliet 7  
2000 Antwerpen, Belgium

#### **5.08 Right to file a complaint**

The right to file a complaint with the supervising Data Protection Authority:

Data Protection Authority  
Drukpersstraat 35  
1000 Brussel, Belgium  
Tel: +32 (0)2 274 48 00  
Fax: +32 (0)2 274 48 35,  
Email: [contact@apd-gba.be](mailto:contact@apd-gba.be)

This is without prejudice to proceedings before the civil courts. If You are from an EU Member State other than Belgium, You may also file a complaint with Your national data protection authority (a list of the data protection authority for each EU-member state can be found here: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)).

If You have suffered damage as a result of the processing of Your Personal Data, You may file a claim for compensation.

### **Article 6. Safety and confidentiality**

ExpectMe has adopted safety measures which are suited on a technical, organizational, and physical level to avoid the destruction, the loss, the forgery, the adjustment, the non-authorized access or the notification of the Personal Data by accident to a third party, as well as the non-authorized processing of these data.

Nevertheless, if these events would occur and would affect your Personal Data, ExpectMe will inform you of the breach without undue delay, including a summary description of the potential impact and a recommendation on measures to mitigate the possible adverse effects of the breach.

Examples of safety measures adopted by ExpectMe include:

- (Physical/Digital) Access control systems;
- Password management systems; and
- Secure data storage

ExpectMe shall not be liable in any way for direct or indirect damages caused by a wrongfully or improper use of the Personal Data by a third party.

At the same time, you also share responsibility for maintaining the privacy and security of the Services, for example: by not allowing any third party to have insight in your confidential communication(s).

## **Article 7. Applicable Law and Jurisdiction**

This Privacy Statement is managed, interpreted, and executed in accordance with Belgian law, which exclusively applies to every potential dispute.

The courts and tribunals of Antwerp have exclusive jurisdiction to settle any dispute arising out of or in connection to the interpretation or execution of the present Privacy Statement.

## **Article 8. Cookies**

### **8.01 What are cookies?**

A "cookie" is a small file sent by ExpectMe's server and placed on your computer's hard drive. The information stored on these cookies can only be read by ExpectMe and only for the duration of the visit to the Website.

### **8.02 Why do we use cookies?**

Our Website uses cookies and similar technologies to distinguish your preferences for use from those of other visitors and users of our Website. This helps us to provide you with a better experience when you visit our Website and also allows us to optimize our Website.

All websites that target certain parts of the European Union are required to obtain your consent to the use or storage of cookies and similar technologies on your computers or mobile devices. This cookie policy gives you clear and complete information about the cookies we use and their purpose.

The cookies we use are safe. The information we collect using cookies helps us to identify any errors or to show you specific services that might be of your interest.

### **8.03 Type of cookies**

There are many different cookies that can be distinguished according to functionality, origin, or storage period. Below you may find a general description of the most common types of cookies. Next, a detailed overview is given of the different cookies that are used on our Website.

#### Necessary cookies

These cookies are necessary for the Website to function and cannot be disabled in our systems. They are usually set in response to actions taken by you, such as setting your privacy preferences, logging in, or filling out forms. They are necessary for the good communication and facilitation of the page navigation (e.g. returning to a previous page, etc.).

#### Functional cookies

These cookies increase the user-friendliness of the Website by reminding you of your choices (e.g. language preference) and offering improved visitor and user functionality and personalization. For example, these cookies allow certain settings to be personalized at your request. Non-acceptance of these cookies may affect the Website performance and functionality and may restrict access to Website content. These cookies can be set by us or by third-party providers whose services we have added to our pages.

### Analytic cookies

These cookies collect information about the use of our Website, such as the number of visitors, the time visitors spend on a Web page and any error messages. They help us improve the performance of the Website. These cookies will not identify you.

### Marketing cookies

These cookies are used to deliver content that is more relevant to you. They can be used to deliver targeted ads or to limit the number of times you see an ad. These cookies can be used to remember websites that you have visited and share this information with other parties, including advertisers. These cookies may also be set by advertising partners through a website and used by those companies to build a profile of your interests and show you relevant ads on other sites.

### Social Sharing Cookies

We use some social sharing plugins, to allow you to share certain pages of our Website on social media. These plugins place cookies so that you can correctly view how many times a page has been shared.

### Third-party cookies

First-party cookies are cookies that are sent from our servers or domains from which the requested service is offered. Third-party cookies are cookies that are sent to your browser from a server or domain that is not managed by us, but by a cooperating organization. Only these third parties have access to those cookies and the information collected by the cookie. If you would like to know more about these cookies, please refer to the policies that these parties offer on their respective websites. Please note that we have no influence on the content of their policy or on the content of these third-party cookies.

## **First Party Cookies**

Domain name: [www.expect-me.com](http://www.expect-me.com)

Name	Type	Description	Storage time
_hjFirstSeen	Necessary cookie	The cookie is set so Hotjar can track the beginning of the user's journey for a total session count. It does not contain any identifiable information.	30 minutes
_hjIncludedInSessionSample	Necessary cookie	This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's daily session limit.	2 minutes
_hjAbsoluteSessionInProgress	Necessary cookie	The cookie is set so Hotjar can track the beginning of the user's journey for a total session count. It does not contain any identifiable information.	30 minutes
_hjIncludedInPageviewSample	Necessary cookie	This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's pageview limit.	2 minutes
_ga	Analytic cookie	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by	2 years



		assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports.	
__hstc	Analytic cookie	This cookie name is associated with websites built on the HubSpot platform. It is reported by them as being used for website analytics.	6 months
_gid	Analytic cookie	This cookie is set by Google Analytics. It stores and update a unique value for each page visited and is used to count and track pageviews.	1 day
__hssrc	Analytic cookie	This cookie name is associated with websites built on the HubSpot platform. It is reported by them as being used for website analytics.	session
__hssc	Analytic cookie	This cookie name is associated with websites built on the HubSpot platform. It is reported by them as being used for website analytics.	30 minutes
_gat_gtag_UA_192773165_1	Marketing cookie	This cookie is part of Google Analytics and is used to limit requests (throttle request rate).	1 minute

### Third-Party Cookies

Name	Type	Description	Storage time
__cf_bm (domain: .hubspot.com)	Necessary cookie	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	30 minutes
YSC (domain: .youtube.com)	Marketing cookie	This cookie is set by YouTube to track views of embedded videos.	session
VISITOR_INFO1_LIVE (domain: .youtube.com)	Marketing cookie	This cookie is set by Youtube to keep track of user preferences for Youtube videos embedded in sites; it can also determine whether the website visitor is using the new or old version of the Youtube interface.	6 months

#### 8.04 Your consent

Upon your first visit to our Website, you will be asked to accept or refuse cookies. With this consent, you agree to the different types of cookies we use.

#### 8.05 Managing your cookies

You can block cookies by altering your browser's settings. The rejection of these cookies may inhibit some functionalities on the Website.