XO HOTELS PRIVACY STATEMENT

Version October 2026

1. Introduction

XO Hotels (hereinafter: “we”) attaches great importance to the protection of personal data of our guests, website visitors, employees, and other stakeholders. We process personal data carefully and in accordance with the General Data Protection Regulation (GDPR).
In this privacy statement, we explain which data we collect, why we do so, and what rights you have.

2. What personal data do we process?

We may process various types of personal data, depending on your interaction with us. This includes identification and contact details such as your name, address, place of residence, email address, and telephone number.

In addition, we process reservation and stay-related data, including your booking information, stay dates, and any preferences you share with us. For payment processing, we handle payment and invoicing details using secure and recognized payment providers.

In some cases, we are legally required to register identification data, such as passport or ID details. We may also process data regarding your preferences and interests, for example for marketing purposes or to tailor your stay as much as possible to your wishes.

Furthermore, we process communication data such as correspondence, reviews, and feedback. If you apply for a job with us, we process your application data, including your CV and motivation letter.

Finally, we collect website and usage data such as your IP address, cookies, and information about your browsing behavior on our website.

If you make a reservation for multiple persons, we may also process personal data of fellow travelers insofar as necessary for the execution of the reservation.

3. Data obtained from third parties

We may receive personal data from third parties, such as booking platforms, payment providers, or business partners. This only occurs if these parties are legally permitted to share the data with us. We treat such data with the same level of care as data provided directly by you.

4. Purposes of processing

XO Hotels primarily processes personal data to perform agreements with guests, such as managing reservations, facilitating stays, maintaining contact, and handling payments.

We also use personal data for marketing and communication purposes, for example to send newsletters and offers or to better tailor our communication to your preferences. Where required, we will ask for your consent.

We process data to improve our services, including analyzing the use of our website and services and conducting customer satisfaction surveys.

For applicants, we process personal data in the context of recruitment and selection and to communicate with candidates.

Finally, we process personal data to comply with legal obligations and for purposes such as security and fraud prevention.

5. Camera surveillance

To ensure the safety of guests and employees, XO Hotels uses camera surveillance in and around its locations. Camera footage is only accessed by authorized personnel and may be shared with official authorities upon request. As a general rule, footage is not retained for longer than four weeks, unless a longer retention period is necessary in connection with an incident or investigation.

6. AI Telephony and Call Recordings

XO Hotels uses an AI-powered telephone assistant to answer incoming calls and provide guests with the best possible service. These calls are recorded to ensure that questions and requests are handled correctly, to monitor the quality of our services, and to improve our telephone service.

Personal data may be processed during these calls, such as your telephone number, voice recordings, and any information you provide during the conversation. Call recordings are retained for a maximum of 12 months and are only accessible to authorized personnel.

7. Sharing personal data

XO Hotels only shares personal data with third parties when this is necessary for the provision of services or to comply with legal obligations. This may include sharing data within different XO Hotels locations, with external service providers such as IT suppliers and payment providers, or with business partners in the context of, for example, group reservations.

Where we engage third parties to process personal data on our behalf, we ensure that appropriate contractual agreements are in place to safeguard your data.

8. Retention period

We do not retain your personal data longer than necessary for the purposes for which it was collected, unless we are legally required to do so. Below are the main retention periods we apply:

- **Reservation and stay data**
  Up to 7 years if part of our financial administration (tax legislation).
- **Payment and invoicing data**
  7 years based on fiscal retention obligations
- **Night register data (statutory hotel registration)**
  7 years in accordance with legal requirements.
- **Camera footage**
  Maximum of 4 weeks, unless an incident requires longer retention.
- **Application data**
  Up to 4 weeks after completion of the application procedure.
  With consent, up to 1 year.
- **Marketing and communication data**
  Until you unsubscribe or withdraw your consent.
- **Website and cookie data**
  According to applicable cookie settings and legal guidelines (usually a maximum of 26 months for analytical cookies).
- **AI telephony and call recordings**
  Up to 12 months after the telephone call

After the retention period, your data will be deleted or anonymized.

9. Cookies

XO Hotels uses cookies. A cookie is a small text file that is stored on the visitor's device upon first visit to a website. Cookies are used to collect information about a person, the website, or statistics. Some cookies also improve the user experience of the website.

If you do not want our website to store cookies on your device, you can indicate this in the cookie notification shown on your first visit. If you have previously accepted cookies, this notification will no longer appear, and you will need to delete cookies manually if desired.

You can also choose to block cookies via your browser. If you block all cookies, our website may not function properly. We recommend selectively disabling only unwanted cookies via your browser settings.

We use Google Analytics for statistical purposes. Data is anonymized as much as possible. More information: https://policies.google.com/privacy

10. Security and digital safety

XO Hotels takes appropriate technical and organizational measures to protect personal data against loss, misuse, unauthorized access, unwanted disclosure, and unlawful processing. These measures are regularly evaluated and adjusted where necessary.

We strive to secure our systems, networks, and communication channels as effectively as possible against cyber incidents. However, we cannot guarantee that our digital systems are completely free from disruptions or security breaches.

XO Hotels will never ask you via email, WhatsApp, or other digital communication channels to provide sensitive data, such as payment or credit card information, outside a secure and official payment environment. We therefore advise you to remain alert to fraudulent messages that appear to be sent on behalf of XO Hotels.

If you receive suspicious communication or are unsure whether it originates from XO Hotels, please contact us via our official contact details.

In the event of a data breach that may affect your personal data, we will act in accordance with applicable laws and regulations, including notification to the Dutch Data Protection Authority and data subjects where required.

11. **Your rights**

Under privacy legislation, you have various rights regarding your personal data. You may request access to the data we have stored about you. In such cases, we may ask you to provide a reservation number to locate your data.

You may also request correction of your data if it is incorrect or incomplete. In addition, you may request deletion of your data, unless we are legally required to retain it. We may also ask for a reservation number to verify such requests.

Furthermore, you have the right to restrict the processing of your personal data or to object to it, in which case we will immediately stop using your data. If we process data based on your consent, you may withdraw that consent at any time.

If you wish to exercise your rights, you can contact us via info@xohotels.com. We will respond within four weeks.

To verify your identity, we may request additional information, such as a reservation number. If you provide a copy of your ID, we advise you to mask your citizen service number (BSN) and photo.

12. **Complaints**

If you have a complaint about the use of your personal data, you may file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens), which is the competent supervisory authority.