



PRIVACY POLICY THE JAMES

OUR MISSION

We at The James are dedicated to protecting your privacy and safeguarding your personal data. Our mission is to consistently exceed our guests' expectations in terms of the products and services we provide to our business and leisure travellers. We strive to create and experience that is responsive to our guests' needs by using the information you entrust us with responsibly. We are committed to respecting your privacy and adhering to the principles of applicable data protection and privacy laws throughout the world.

We have provided this Privacy Statement as an explanation of how we collect, how the use of this information can benefit your experience on our websites and during your relationship with us, with whom and for what purposes we may share the information, and the choices you can make about our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practises.

PURPOSE FOR COLLECTION

We are fully committed to providing you with information about our hotel and use of personal data furnished by, or collected from you while using our web sites, products and services. It is our standard practice not to ask you for information unless we need it. The main purpose for collecting your personal data is to allow us to provide you with the requested services such as processing a transaction. In addition, information may be collected for the following purposes:

- Fulfilling reservation or information requests;
- Purchasing products or services;
- Responding to our communications (e.g., surveys, promotional offers, or reservation confirmations);
- Accommodating your personal preferences;
- Fulfilling requests for services or recommendations we provide you;
- Working with third party sources with your consent, including processing information you make available via social networking and other web sites, to better assist us with understanding your interests and to serve you better;
- Updating your contact information including your address; or
- Facilitating the transmission of forward to a friend email at your request.

We may also ask your permission to use your personal data for the following purposes:

- Sending you direct marketing messages and communications in relation to the products and services offered by The James, our strategic marketing partners, and other trusted third parties;
- Performing market research via surveys to better serve your needs, improve the effectiveness of our web sites, your hotel experience, our various types of communications, advertising campaigns, and/or promotional activities.



- We may also analyze personal data we process for the above-mentioned purposes to better understand our customers' needs, improve our services and the way we operate. The outcome of such analysis will only be aggregate data that will not be used to identify, single out, or take action towards an individual, but only to analyze trends and other behavior at aggregate level.

TYPES OF INFORMATION WE COLLECT

We collect information about our hotel guests and web site visitors so that we can provide an experience that is responsive to our guests' and visitors' needs. In order to fulfil the above mentioned purposes, we may collect personal data or information relating to you that can identify you, directly or indirectly. Such data may primarily include your name, home, work and e-mail addresses, telephone, mobile telephone, and fax numbers, credit card information, date of birth, gender, and lifestyle information such as room preferences, leisure activities, names and ages of children, and other information necessary to fulfill special requests (e.g., health conditions that require special room accommodations).

CONSENT

You may opt out of The James surveys and marketing emails relating to The James offerings and services, when we collect your information and at any time by clicking on the link included in such communications, or by contacting us directly to opt out of direct marketing, telemarketing, emails or surveys.

TRANSFERRING

In most cases, the information you provide is added to the The James database. In the course of processing your information, it may be necessary to transfer your personal data to affiliates, properties within the Group and/or third party service providers located in the Netherlands and throughout the world for the purposes outlined within this Privacy Statement. Unless otherwise precluded or governed by legal requirements and/or process, The James subsidiaries, affiliates and property owners that may receive your information are obligated to follow similar privacy requirements relating to your personal data. As a general practice, we do not sell, rent, or give physical possession of your personal data to unaffiliated third parties outside the Group.

Situations in which we may share your information to others include:

- when we have received your consent to do so
- when companies or service providers that perform business activities on behalf of The James require such information in order to conduct the tasks defined in their agreements with The James (e.g., credit card processing, customer support services, market research administration or database management services),
- when a hotel or other property leaves the group system and access to your personal data is necessary to facilitate business operations or meet contractual obligations in connection with the fulfilment of reservations that are booked for future stays or events,
- in the event The James is merged or acquired by another company,



- to comply with legal or regulatory requirements or obligations in accordance with applicable law, a court order or a subpoena;
- in case of emergency such as to safeguard the life, health, or property of an individual. If information is shared as mentioned above, we seek to limit the scope of information that is furnished to the amount necessary for the performance of the specific purpose

Unless otherwise precluded by legal process, third parties are obligated to protect your personal data in line with our policy and abide by applicable privacy laws and regulations.

DELETION AND RETENTION OF YOUR PERSONAL DATA

Your personal data will be kept in a form which enables to identify you for no longer than it is necessary for the purposes for which we collected and use your data. Your personal data may be retained in certain files for a period of time as required by applicable law and following The James's data retention policies in order to comply with such financial or legal requirements, to properly resolve disputes or to troubleshoot problems. In addition, some types of information may be stored indefinitely due to technical constraints, and will be blocked from further processing for purposes which are not mandatory by law.

ACCESSING, UPDATING AND REMOVING YOUR PERSONAL DATA

You may request to have access to your personal data we keep or to have your personal data updated, erased or blocked unless this proves impossible or involves a disproportionate effort. You may request confirmation as to whether we process your personal data and what that data constitutes.

Where allowed under local law, you may request us to erase your personal data, if one of the following circumstances exist:

- your personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- if the processing was based on your consent and if you have withdrawn your consent, your consent has expired, or where there is no longer a legal ground for the processing of your personal data;
- If the processing is for direct marketing purposes or if you make a justifiable objection;
- a court or regulatory authority has ruled that your personal data concerned must be erased;
- your personal data was unlawfully processed.

SECURITY SAFEGUARDS

The James recognizes the importance of information security, and is constantly reviewing and enhancing our technical, physical, and logical security rules and procedures. All websites and servers have security measures in place to help protect your personal data against accidental, loss, misuse, unlawful or unauthorized access, disclosure, or alteration while under our control. Although "guaranteed security" does not exist either on or off the Internet, we safeguard your information using appropriate administrative, procedural and technical safeguards.



ON-LINE TECHNOLOGIES

The James and its third party marketing partners may use cookies, invisible pixels, and web beacons to obtain information about you while visiting our web sites. A cookie is a very small text file that is sent to your browser from a web server and stored on your computer's hard drive. The James assign your computer with a unique identifier, which in turn, becomes your identification card whenever you return to a The James site.

Cookies are designed to save you time because they help us to provide you with a customized experience without you having to remind us of your preferences each time you return to our web pages. The James cookies are not designed to damage your files, nor can they read information from other files on your computer hard drive.

Cookies can also help us provide you with a personalized experience in the following ways:

- remembering your user name and password for future visits so log-in is easier and faster.
- ensuring you are provided with the appropriate frames and content
- ensuring you obtain all requested information.
- helping us deliver communications that are relevant and responsive to your interests and location.

The James cookies are limited to our sites and services only and are not designed to follow you when traveling on the Internet after leaving. We track the usage of our web sites in order to better meet your needs and to help make it easier for you to find information in the future. Please note that in addition to The James cookies, various third parties may also place cookies on your computer's hard drive.

The James is not responsible for the presence or absence of third party cookies, or for the technological capabilities or practices employed by third parties in connection with third party cookies.

If you would prefer not to have the benefits of cookies, your Internet browser can be adjusted to treat cookies in different ways. Depending upon the type of browser you are using, you may be able to configure your browser so that:

- you are prompted to accept or reject cookies on an individual basis or ,
 - you may be able to prevent your browser from accepting any cookies at all.
- You should refer to the supplier or manufacturer of your web browser for specific details about cookie security. However, you should also understand that rejecting cookies might affect your ability to perform certain transactions on our web sites and our ability to recognize your browser from one visit to the next.

The James may use this information to improve marketing programs and content.

LINKS TO OTHER WEBSITES

In order to anticipate your needs, our website provides links to other web sites and third parties for your convenience and information. We are not responsible for the collection, use, maintenance, sharing or disclosure of data (including personal data) by such third parties. We encourage you to contact these third parties to ask questions about their privacy practices, policies and security measures before disclosing any personal data. We recommend that you review the privacy statements and policies of linked web sites to understand how those web sites collect, use and store information



MINORS

We do not seek to obtain nor does it wish to receive personal data directly from minors; however, we cannot always determine the age of persons who access and use our web sites. If a minor (as defined by applicable law) provides us with his/her data without parental or guardian consent, we encourage the parent or guardian to contact us to have this information removed and to unsubscribe the minor from future The James marketing communications.

CONTACT US

UPDATING YOUR COMMUNICATION PREFERENCES

If you would like to update your information, modify your communication preferences, or if you do not want to receive marketing communications from The James in the future, you can contact us:

by e-mail:
info@thejames.nl

by telephone:
+31(0) 10 76 05 070

UPDATES TO THE PRIVACY STATEMENT

The James may amend this Privacy Statement from time to time in order to meet changes in the regulatory environment, business needs, or to satisfy the needs of our guests, properties, strategic marketing partners, and service providers. Updated versions will be posted to our web site and date stamped so that you are always aware of when the Privacy Statement was last updated.