



Privacy Statement

RIVER Business Travel Solutions B.V. (having its registered office in Woerden, the Netherlands), trade register number 72968796, hereinafter referred to as “ RIVER BTS/we/us”, is a Travel Agency that provides an access to the B2B voucher based online hotel reservation system (hereinafter referred as the application). This Privacy Policy determines how the personal information is used and protected.

1. General

1.1 This Privacy Policy applies to all existing and potential clients/users and/or contractors/suppliers/providers (hereinafter may be referred as “you”) of the application or any personal data provided by them to the application directly or via the website, operated by or on behalf of us.

1.2 The application is a B2B system and does not work directly with consumers/hotel guests/travelers; RIVER BTS is not the data controller in respect of any such personal data. The data controllers in these cases will be the hotel or the actual service provider and the company via which a booking was made.

1.3 If you are a hotel guest/traveler and have any queries regarding your personal data, you should contact the relevant data controller directly. TS processes the personal data of the hotel guests or travelers (namely the names), with the purpose of the organization of the process of hotel reservation or other travel related service on behalf of the controllers, who received the consent from their clients/hotel guests/travelers.

1.4 In respect of all personal info of the clients/users/suppliers, RIVER BTS determines how all personal information is stored, processed or transferred. RIVER BTS treats your personal data in accordance with the terms of the applicable laws and this Privacy Policy.

2. Information we collect

2.1 In respect of all persons to whom this Privacy Policy applies, the information we hold about you comes from you (or your company/employer/contractor) and with your consent, for example by doing any of the following:

2.1.1 filling in forms or making an enquiry via our website;

2.1.2 providing information in the course of negotiating and/or entering into contractual agreements with us; and

2.1.3 corresponding with us by phone, email or otherwise;

2.1.4 hotel reservation/cancellation/viewing reservation and billing details.

2.2 The information, we collect when you use RIVER BTS system may include:

2.2.1 your name, email address and phone number;

2.2.2 guest/travelers name(s);

2.2.3 your booking references;

2.2.4 the Internet Protocol (IP) address attached to your device;

2.2.5 your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and certain device information; and



2.2.6 information about your visit, including the full Uniform Resource Locators (URLs), click stream to, through and from our website (including date and time), services you viewed or searched for page response times, download errors, length of visits to certain pages, page interaction information and methods used to browse away from the page.

3. Use of the information

3.1 We use personal information in the following ways:

- for internal record keeping and account creation;
- in order to enter into contractual agreements in relation to hotel reservations made in the application;
- to carry out our obligations arising from any entered agreement, including, but not limited to, the processing and administration of bookings;
- to provide the services that clients/users and/or suppliers request from us;
- to contact you in the course of providing services to you in your capacity as a client/user (company), contractor/supplier/provider as applicable;
- for insight purposes (e.g. to analyze market trends)

3.2 Personal Information collected, is stored and processed in The Netherlands. RIVER BTS takes the privacy of personal data seriously and makes the steps to ensure the security and safeguarding of all personal information data.

4. Purposes/legal basis

4.1 RIVER BTS can process the personal information with the purposes of:

- managing of the application;
- organization of the process of hotel reservations;
- in order to execute agreements;
- entering and maintenance of business agreements;
- invoicing/reporting;
- administration of the operated websites/systems;
- legitimate business interest and needs;
- credit and legal verifications;
- compliancy with the applicable law.

5. Sharing personal information

5.1 Provided personal data may be shared for any legal processing only for the purposes set out in this Privacy policy.

5.2 RIVER BTS may share the personal information with sub-processors (our group companies and contracted third parties).

5.3 RIVER BTS may share the personal information with the wholesalers, hotels and payment providers/suppliers or on request – with airlines, car rentals, flights and activity providers - who fulfill the ordered travel reservations.



5.4 If necessary and consistent with the purpose(s), RIVER BTS may share the personal information with business partners, with whom RIVER BTS may jointly offer products or services.

5.5 RIVER BTS may share your personal information in response to subpoenas, court orders, other legal process; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us; when we can prevent or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of the company, RIVER BTS system and website, our customers, clients or others.

5.6 RIVER BTS may share your personal information with regulators or other third parties for the purposes of monitoring and/or enforcing any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts.

5.7 RIVER BTS may share your personal information with the professional advisors, financial institutions and auditors for the purpose of seeking professional advice, business needs or to meet our audit responsibilities.

5.8 RIVER BTS may share your personal information with third parties where you have a relationship with that third party and you have consented to us sending information (for example mid-offices, other third-party application providers, insurance companies).

6. Retention period

6.1 RIVER BTS aims to work accordance with the data minimization principle. Where there is no longer need to hold personal information, we dispose of it in a secure manner. Unless we are required or permitted by law to keep the personal data for a specific retention period, we may retain personal information for the specified Privacy policy purposes and periods:

- for the execution of an agreement with you for a period of full seven calendar years following fulfillment of the ordered services;
- for our legitimate business interests, we will delete your information if it is no longer necessary us to retain it.

6.2 If applicable, personal data including names of the hotel guests/travelers, specified in the financial documents, may be stored during seven calendar years after closure of the financial year, as required by the Dutch tax legislation.

7. Security

7.1. In relation to the processing of personal data, RIVER BTS takes all sufficient technical and organizational measures, that are appropriate to the risks and type of the provided services, against loss or any form of unlawful and unauthorized processing.

7.2 In certain cases it may be necessary to transfer the personal information to countries outside The Netherlands and European Economic Area (EEA), to locations that may have different levels of protection and security. However, RIVER BTS will use and press for the appropriate safeguards and protection measures, for example, using the European Commission's Standard Model Clauses for transfers of personal data outside the EEA or in accordance with any other requirements under data protection legislation.

7.3 The registration process via any website or other online platform operated by us may include the creation of a username, password and/or other identification information. All such details should be kept confidential by you and should not be disclosed to or shared with anyone.



You need to use strong, secure and random password and change it regularly (advisable one per two month). If you disclose details of your username or password information, you will be responsible for all activities undertaken on the platform where they are used.

7.4 All information you provide to RIVER BTS is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone and to notify us about outdated logins.

7.5 RIVER BTS periodically carries out risk assessments and audits to monitor and review threats and vulnerabilities to our systems to prevent fraud. Hors B.V./RIVER BTS is PCI DSS and ISO/IEC 27001:2013 certified.

7.6 RIVER BTS takes the appropriate technical, contractual measures for protection of personal data. However, we cannot guarantee and are not liable for the security of personal information which is transmitted to any website or other online platform operated by us or by third parties with the purposed specified in this Privacy Policy via an internet or other similar connections.

8. Your rights to your personal data

8.1 If you are based within The Netherlands or the EEA or within another jurisdiction having similar data protection laws, you have following rights (upon written request):

8.1.1 **right to access:** the right to request certain information about, access to and copies of the personal information about you that we are holding;

8.1.2 **right to rectification:** the right to have your personal information rectified if it is inaccurate or incomplete; and

8.1.3 in certain circumstances, you will also have the following rights:

8.1.3.1 **right to erasure/ "right to be forgotten":** the right to withdraw your consent to our processing of the data (if the processing is based on your consent) and the right to request that we delete or erase your personal information from our systems (however, this will not apply if we are required to hold on to the information for compliance with any legal obligation or if we require the information to establish or defend any legal claim);

8.1.3.2 **right to restriction of use of your information:** the right to stop us from using your personal information or limit the way in which we can use it;

8.1.3.3 **right to object:** the right to object to our use of your personal information including where we use it for our legitimate interests or for marketing purposes;

8.1.3.4. **right to data portability:** the right to request that we return any information you have provided in a structured, commonly used and machine-readable format, or that we send it directly to another company, where technically feasible.

8.2 Please note, that if you withdraw your consent to the use of your personal information for purposes set out in our Privacy Policy, we may not be able to provide you with access to all or parts of our website or other platforms operated by us or carry out our contractual obligations to you.

8.3 If you are a hotel guest/traveler and have any queries regarding your personal data and your rights, you should contact the relevant data controller directly (or contact us and we will try to assist).



8.4 RIVER BTS contact details for the privacy related queries is: privacy@RIVER BTS.com You may contact related Dutch authority Autoriteit Persoonsgegevens directly via autoriteitpersoonsgegevens.nl

9. Changes to our privacy policy

9.1 We may revise this Privacy Policy from time to time. We will always update this Privacy Policy on our website, so please read it when you visit the website.