KINGS AVENUE

LUXURY CHALETS

Kings Avenue Privacy Policy

Kings Avenue, located at 4, Rue du Commerce CH-1204 Geneva, Switzerland, is responsible for the processing of personal data as shown in this privacy policy.

Paul Schavemaker is the Data Protection Officer at Kings Avenue. He can be reached at <u>paul@kingsavenue.com</u>

Kings Avenue S.a.r.l.

Rue du Commerce 4

1204 Geneva

Switzerland

Personal data that we process

Kings Avenue processes your personal data when you are using our services and/or by providing this information to us. Below is an overview of the personal data we process:

- A. If we receive your data via the website, the email, post or otherwise, we process the following data from you:
 - a. Name
 - b. Address
 - c. Residence
 - d. Phone number
 - e. E-mail address
- B. Contact history
 - a. We process information about the contact you had with us:
 - b. What the contact was about (purchase in website or question).
 - c. When was the contact and with whom?
 - d. How (via mail, our website, e-mail, app).

Special and/or sensitive personal data that we process

Our website and/or service does <u>not</u> intend to collect data about website visitors who are younger than 16 years of age. Unless they have permission from parents or guardians. However, we cannot check whether a visitor is older than 16. We encourage parents to be involved in the online activities of their children, in order to prevent data about children from being collected without parental consent. If you are convinced that we have collected personal information about a minor without this permission, please contact us through info@kingsavenue.com, and we will delete this information.

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For what purpose and on what basis do we process personal data

Kings Avenue processes your personal data for the following purposes:

A. Execution of Agreement

With your personal data we can, for example: Contact you.

Capture your interest in our services/products.

To conclude and execute an agreement with you.

Put your details into our administration and update them if there are any changes. B. Reducing risks

We are jointly responsible for the safety of you, ours and our customers. Our measures consists of:

a. Laws and regulations

Kings Avenue acts in accordance with applicable laws and regulations such as privacy:

- i. Ensure good security. Think of user names, passwords and audit questions.
- ii. And we invest in resources that protect you and us from all kinds of crime.
- iii. Internal quality research into possible problems and risks and testing whether legislation has been properly implemented.
- b. Laws and regulations

Kings Avenue acts in accordance with applicable laws and regulations such as privacy:

- iv. General Data Processing Regulation (GDPR) (from May 25, 2018)
- v. Telecommunications Act (became e-privacy regulation)

Automated decision-making

Kings Avenue does <u>not</u> make decisions based on automated processing on matters that can have (significant) consequences for people. These are decisions taken by computer programs or systems, without a person (for example an employee of Kings Avenue) intervening. Kings Avenue uses the following computer programs or systems:

- WordPress, as CMS of the website
- Google Analytics, as a data tool for traffic and website visits
- Google AdWords, as a data tool for traffic and website visits

How we handle your personal data

We handle your data with the greatest care.

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A. Security

We have taken technical and organizational measures to protect your data against loss or unlawful processing. Think of measures to safely use our website and IT systems and to prevent abuse. But also to the security of areas where data is stored, information security policy and training of our employees.

B. Confidentiality

All our employees have signed a confidentiality agreement. We handle carefully the information that you entrust to us. And only authorized personnel may view and process your data.

How long do we store personal data

Kings Avenue does not store your personal data any longer than strictly necessary to realize the purposes for which your data is collected. We use the following retention periods for the following (categories) of personal data:

- Personal data> Indefinite time> In our offline customer database (Excel)
- Address> Indefinite time> In our offline customer database (Excel)
- Phone number> Indefinite time> In our offline customer database (Excel)
- E-mail address> Indefinite time> In our offline customer database (Excel)

Sharing personal data with third parties

Kings Avenue does not provide personal data to third parties, unless we have permission from you, or if this is permitted by law or necessary or in case of fraud.

Cookies, or similar technologies, that we use

Kings Avenue uses only technical and functional cookies. And analytical cookies, from Google Analytics and Google AdWords, that do not infringe your privacy. A cookie is a small text file that is stored in the browser of your computer, tablet or smartphone when you first visit this website. The cookies we use are necessary for the technical operation of the website and your ease of use. They ensure that the website works properly and remember, for example, your preferences. We can also optimize our website with this. You can opt out of cookies by setting your internet browser so that it does not store cookies anymore. In addition, you can also delete all information previously saved via the settings of your browser.

Viewing, modifying or deleting data

You have the right to view, correct or delete your personal data. In addition, you have the right to withdraw your consent to the data processing or to object to the processing of your personal data by Kings Avenue and you have the right to data portability. This means that you

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can submit a request to us to send any personal information we have of you in a computer file to you or to another organization specified by you.

A. View or correct data

You have the right to ask us what personal data we process about you and to have incorrect data modified or removed. If you want to view your data, we will only give this information if we have sufficient certainty that you are who you say you are. For that we ask audit questions.

Send a request for inspection or correction to Kings Avenue (info@kingsavenue.com, further details at the bottom of this statement). Include a copy of your ID. On this copy you can make your passport photo and citizen service number (BSN) invisible. We recommend that you state on the copy for which it is intended. You will receive a response from us within four weeks.

- B. Have data removed and the right to be 'forgotten'. In the following situations, you have the right to have the data that we have deleted:
 - a. the personal data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - b. permission for processing has been withdrawn;
 - c. a valid objection has been made to the processing;
 - d. the personal data have been processed unlawfully;
 - e. on the basis of a legal obligation to delete the personal data.

C. Limitation of processing If you believe that we are processing your data unlawfully or that the data processed by us are incorrect, you can request a limitation of the processing. This means that the data can no longer be processed.

D. Transfer of the data (data portability)You have the right to receive a copy of the data you have provided to us.

We will respond to your request as quickly as possible, but within four weeks. Kings Avenue also wants to point out that you have the ability to file a complaint with your national supervisory authority.

Adaptation of the privacy statement

We can adjust this privacy statement. We can do this in new developments, for example if something changes in our business activities or in the law or in case law. We therefore recommend that you review this privacy statement regularly when you visit our website. This text was last modified on 10 April 2018.