

Records of processing activities (Data register) Article 30 GDPR

Status: agreed
version: 1.0 - 2018-08-28

A	Contacts details:	Controller: NHL Stenden University of Applied Sciences	Contact details Data Protection Officer: Willem Bakker
	NHL Stenden University of Applied Sciences	Mrs. Erica Schaper, President of the Executive Board of NHL Stenden University of Applied Sciences Mandated: Mr. Thulani Xhali (Director Stenden University Hotel BV)	willem.bakker@stenden.com www.nhlstenden.com

B	Category of the person concerned: Hotel, conference and restaurants guests	C	Purpose of processing	lawfulness	H	Transfer of personal data outside the EU
	<ul style="list-style-type: none"> a. Services and facilities b. Marketing c. Compliant with authorities (guest records) d. Research (educational and commercial) 		<ul style="list-style-type: none"> C Contract LI Legitimate interest LO Legal obligation LI Legitimate interest 			

J	General description of the technical and organizational security measures	E	Source documents	I	Data retention periods	G	External processors					
	Assessment carried out on information security (ISO 27002), assessment of maturity level 2.5 on the basis of the SURF Assessment Framework (scale 1-5). Assessment carried out on Privacy (GDPR-2018), assessment follows.	I	Online Travel Agencies	7 years after termination then anonymize		Name	Description	Website information	Data-location			
		II	Directly from customer	7 years after termination then anonymize	1	MEWS	Processing of guests records (reservations)	www.mewssystems.com	Microsoft Azure Ireland			
		III	Internal Bookers within NHL Stenden	7 years after termination then anonymize	2	Becurious	Hotel website	www.becurious.com	Denit Hosting Solutions			
		IV	External bookers	7 years after termination then anonymize	3	PXIER	Banquet sales system	www.pxier.com	Amazon			
		V	Indirectly from customer eg. Social media	7 years after termination then anonymize	4	Revinat	Reputation management system	www.revinat.com	Amazon			
		VI			5	Pocket Menu	websites (3)	pocketmenu.nl	Amsterdam			
		VII			DS	Dataregistersheet						

D	Categories of personal data	F	External controllers						G	External processors						Internal applications		Internal users					AIC classification
		Accountant						MEWS	Becurious	PXIER	Revinat	POCKET	AFAS	other	MS OFFICE	Other DS	Finance	RD	F&B	Meeting you	Catering		
		lo						c-li-lo	c	c-li	li	c	c-li		li		li	li	li	li	li		
1a	Compact contact details	X						X	X	X	X	X			X		X	X	X	X	X	M-H-M	
	a. name	X						X	X	X	X	X			X		X	X	X	X	X	M-H-M	
	b. phone number	X						X	X	X	X	X			X		X	X	X	X	X	M-H-M	
	c. userid	X						X	X	X	X	X			X		X	X	X	X	X	M-H-M	
	d. e-mail address	X						X	X	X	X	X			X		X	X	X	X	X	M-H-M	
1b	Complete contact details	X						X		X		X			X		X	X	X	X	X	M-H-M	
	a. titlature	X						X		X		X			X		X	X	X	X	X	M-H-M	
	b. job title	X						X		X		X			X		X	X	X	X	X	M-H-M	
	c. gender	X						X		X		X			X		X	X	X	X	X	M-H-M	
	d. date of birth	X						X		X		X			X		X	X	X	X	X	M-H-M	
	e. address	X						X		X		X			X		X	X	X	X	X	M-H-M	
	f. ZIP Code	X						X		X		X			X		X	X	X	X	X	M-H-M	
	g. residence	X						X		X		X			X		X	X	X	X	X	M-H-M	
	h. student number	X						X		X		X			X		X	X	X	X	X	M-H-M	
	i. company name	X						X		X		X			X		X	X	X	X	X	M-H-M	
2	Nationality	X						X							X		X	X	X	X		M-H-M	
3	Passport number / drivers license / visa / id card	X						X							X		X	X	X			M-H-H	
4	Medical data (on request of the guest)	X						X							X		X	X		X		M-H-H	
5	Duration of stay	X						X		X	X	X			X		X	X	X	X	X	M-H-M	
6	Finance	X						X							X		X	X		X		M-H-H	
	a. Creditcard details	X						X							X		X	X		X		M-H-H	
7	Imagery (quest recognition for returning guests)	X													X					X		M-H-M	
8	Remarks (about reservation and guests)	X						X	X	X	X	X			X		X	X	X	X	X	M-M-H	

This data register is based on Article 30 of the GDPR (Records of processing activities) and consists of the following parts:



A	Contact details of the institution of higher education
B	Description of the categories of data subjects, such as students, staff or hotel guests.
C	Specific, explicit and legitimate purposes: why do we process your data?
D	Description of the categories of personal data: which data of yours do we process?
E	Sources: how do we collect your personal data?
F	External controllers: parties to which we have to transfer your personal data.
G	Information on the external processors who process your data on our behalf.
H	Overview of the possible transfer of your data to countries outside the EER
I	Overview of retention periods
J	General description of the technical and organizational security measures.

Explanation of the categories of personal data (D)

1a	Compact contact details: exhaustive enumeration
1b	Complete contact details: exhaustive enumeration
4	'Medical data', freely given by the guest, on his own demand, to facilitate his stay in the hotel.
7	Imagery: pictures of the guest, mostly derived from social media, as part of a customer-friendly approach

MEWS	Processing of guests records (reservations)	C	Legal bases
BeCurious	Hotel website	LO	Legal Obligation (taxes, ABP)
PXIER	Banquet sales system	C	Performance of a Contract (reservations)
Revinat	Reputation management system	LI	Legitimate Interest (internal use of applications)
Pocket Menu	Document System	CS	Consent of the Data Subject Consent is always freely given, informed and explicit For instance for use of a photo on the website
		V	Vital Interest belang (For instance if someone's life is in danger)
		Pi	Public Interest (not applicable for hotels)

AIC	Explanation of AIC classification
A	Availability. M (middle) indicates that the information is not available for a maximum of 2 days in the event of a malfunction.
I	Integrity. L (low) stands for "complete" personal data, M stands for "complete and correct" personal data and H (high) stands for "complete, correct and up-to-date" personal data. All personal data are classified as H.
C	Confidentiality. L means that everyone within the organization can see this information, M means that only designated officers in their role (eg salary administration employees) can see personal data, H means that only specified individual employees (eg the manager or consultant) can see personal data.

Rights of the data subject under the GDPR?

1	Right of information (Article 13 and 14)	5	Right to restriction of processing (Article 18)
2	Right of access (Article 15)	6	Right to data portability (Article 20)
3	Right to rectification (Article 16)	7	Right to object (Article 21)
4	Right to erasure ('right to be forgotten', Article 17)	8	Right not to be submitted to automated individual decision-making, including profiling (Article 22)

**Privacystatement
Stenden Hotel**



Datum: 24 juli 2018

We (NHL Stenden University of Applied Sciences) respect your privacy and only process your personal in accordance with the General Data Protection Regulation. This privacy statement specifies what exactly we are doing with your personal data.

A The protection of your personal data and the compliance with the GDPR is monitored by our Data Protection Officer (DPO), Willem Bakker. Email: FG@nhlstenden.com. Phone +31 6 1531 9503. Our DPO is registered at the Dutch Data Protection Authority, the Autoriteit Persoonsgegevens.

Use of your personal data

F At Stenden Hotel, we are committed to maintaining the trust and confidence of our guests. Most importantly, we like to express that Stenden Hotel is not in the business of selling data. We have strict rules and reasons on why we collect the personal data that we do, how we use this data, the limited conditions under which we may disclose it to others, and how we keep it secure. Your data are only shared with an accountant for legal control.

C The processing of your personal data is lawful and based on the fulfillment of the performance of the commercial relation we have with you, on legal obligations or on our legitimate interest. We will process no more data of yours than mentioned in the objectives under C in the data register.

E We process several categories of personal data that we may have received directly from you or via online services or booking offices. Our sources are specified under E..

I We will retain your personal data no longer than permitted by law.

Transfer to third parties

G For the processing of your personal data we can use external processors who act on our behalf and according to our instructions. We close a data protection agreement with all our processors. An overview of all agreements is available on demand.

Security

J We implement appropriate technical and organisational measures to ensure that the personal data for which NHL Stenden University of Applied Sciences is responsible are not processed unlawfully. As a rule we do not send personal data via unsecured connections and we constantly monitor our IT services on security incidents. NHL Stenden had a Computer Security Incident Response Team (CSIRT) that handles all security incidents (e-mail: csirt@nhlstenden.com).

Webcare

To be filled out by Stenden Hotel

Collecting information about the use of our website

See the Cookie Policy of Stenden Hotel (<https://www.stendenhotel.com/en/cookie-policy.html>).

Right of rectification or erasure

You have the right to request us to change or remove personal data or restrict certain processing activities if you believe the processing of this data is incorrect or unlawful. To do this, send a mail to hotel@stendenhotel.com.

Modification of this privacy statement

We reserve the right to modify this privacy statement. Modifications will be published on our website.

Your rights

If you don't agree with the way we process your personal data or if you want to use the rights the privacy legislation grants to you, first send a mail with your request to hotel@stenden.com. If you are not satisfied, address your complaint to our Data Protection Officer, Willem Bakker: fg@nhlstenden.com. In last resort you can contact the Dutch Data Authority (www.autoriteitpersoonsgegevens.nl).

Data sheet External Processors Information

G External processors (cloud)												
	name	defenition	description	processor	website information (vb)	data location (vb)	processor agreement present at formerly:		processor agreement conform GDPR	date last version	location of documents at formerly:	
							NHL	Stenden Hotel			NHL	Stenden
1	MEWS		booking	External	www.mewssystems.com	Microsoft Azure Ireland		X	Yes	May 2018		AFAS
2	Becurious		contact form	External	www.becurious.com	Denit Hosting Solutions		X	Yes	May 2018		AFAS
3	PXIER		sales system	External	www.pxier.com	Amazon		X	Yes	May 2018		AFAS
4	Revinate		reputation management system	External	www.revinate.com	Amazon		X	Yes	May 2018		AFAS
5	Pocket Menu		3 website (Wannee-Stones-MeetingU	External	https://pocketmenu.nl/	Amsterdam data centre		X	Yes	May 2018		AFAS
6	Roomchecking		housekeeping management system	External	http://www.roomchecking.com/en	Data centre Ireland		X	Yes	May 2018		AFAS
7	PROTEL		reservation system	External	http://www.protel.net/	Data centre frankfurt		X	Yes	May 2018		AFAS
9	HOTELKIT		internal information and system	External	https://www.hotelkit.net/en/	Profitbricks GmbH (Berlin)		X	Yes	May 2018		AFAS
10	RIJNJA		Printing service (eg Cv's)	External	https://www.rijnja.nl/	Amsterdam data centre		X	Yes	May 2018		AFAS
11	N200		registration system	External	https://www.events.nl/bedrijven/digitale-communicatie/n200com	Amsterdam data centre		X	Yes	May 2018		AFAS
12	YOURTICKETPROVIDER		ticketing	External	https://www.yourticketprovider.nl/	Amsterdam data centre		X	Yes	May 2018		AFAS
13	AFAS		Afas	External	https://www.afas.nl/	LeaseWeb B.V.		X	Yes	May 2018		AFAS

Data retention periods

		Retention period	Start retention period	Legal basis
I	Online Travel Agencies	7 years after termination then anonymize	25-5-2018	7 Years financial related info
II	Directly from customer	7 years after termination then anonymize	25-5-2018	7 Years financial related info
III	Internal Bookers within NHL Stenden	7 years after termination then anonymize	25-5-2018	7 Years financial related info
IV	External bookers	7 years after termination then anonymize	25-5-2018	7 Years financial related info
V	Indirectly from customer eg. Social media	7 years after termination then anonymize	25-5-2018	7 Years financial related info
VI				
VII				

1a	Compact contact details	7 years after termination then anonymize	25-5-2018	7 Years financial related info
	a. name			
	b. phone number			
	c. userid			
	d. e-mail address			
1b	Complete contact details	7 years after termination then anonymize	25-5-2018	7 Years financial related info
	a. titlature		25-5-2018	7 Years financial related info
	b. job title		25-5-2018	7 Years financial related info
	c. gender		25-5-2018	7 Years financial related info
	d. date of birth		25-5-2018	7 Years financial related info
	e. address		25-5-2018	7 Years financial related info
	f. ZIP Code		25-5-2018	7 Years financial related info
	g. residence		25-5-2018	7 Years financial related info
	h. student number		25-5-2018	7 Years financial related info
	i. company name		25-5-2018	7 Years financial related info
2	Nationality	7 years after termination then anonymize	25-5-2018	7 Years financial related info
3	Passport number / drivers license / visa / id card	7 years after termination then anonymize	25-5-2018	7 Years financial related info
4	Medical data (on request of the guest)	7 years after termination then anonymize	25-5-2018	7 Years financial related info
5	Duration of stay	7 years after termination then anonymize	25-5-2018	7 Years financial related info
6	Finance	7 years after termination then anonymize	25-5-2018	7 Years financial related info
	a. Creditcard details		25-5-2018	7 Years financial related info
7	Imagery (quest recognition for returning guests)	7 years after termination then anonymize	25-5-2018	7 Years financial related info
8	Remarks (about reservation and guests)	7 years after termination then anonymize	25-5-2018	7 Years financial related info

Stenden University Hotel internal users

Employees Organization part Process support Processing purposes		Departments																			
		Finance		Rooms division		Food & Beverage		MeetingU		Catering		Quality		IT		General Manager		Purchasing		Marketing	
				2		3		1		5				Provisioning cycle		4					
		acd		acd		ad		abd		ad		ad		ad		acd		ad		abd	
		Current	GDPR	Current	GDPR	Current	GDPR	Current	GDPR	Current	GDPR	Current	GDPR	Current	GDPR	Current	GDPR	Current	GDPR	Current	GDPR
1a	Compact contact details	x	x	x	x	x	x	x	x	x	x	x	x	x	order	x	x	x	x	x	x
	a. name																				
	b. phone numer																				
	c. userid																				
	d. e-mail address																				
1b	Complete contact details	x	x	x	x	x	x	x	x	x	x			x	order	x	x			x	x
	a. titulature																				
	b. job title																				
	c. gender																				
	d. date of birth																				
	e. address																				
	f. ZIP Code																				
	g. residence																				
	h. student number																				
	i. company name																				
2	Nationality	x		x	x	x	x	x	x					x	order	x	x			x	x
3	Passport number / drivers license / visa / id card	x		x	x	x								x	order	x	x			x	
4	Medical data (on request of the guest)	x		x	x			x	x					x	order	x	x			x	
5	Duration of stay	x		x	x	x	x	x	x	x	x	x	x	x	order	x	x	x	x	x	x
6	Finance	x	x	x	x			x	x					x	order	x	x				
	a. Creditcard details																				
7	Imagery (quest recognition for returning guests)							x	x												
8	Remarks (about reservation and guests)	x	x	x	x	x	x	x	x	x	x	x	x	x	order	x	x	x	x	x	x

upon written request and/or for admin services

DATA SHEET

Contact details limited
Complete contact details
Nationality
Passport number / drivers license / visa / id card
Medical data (on request of the guest)
Duration of stay
Finance
Imagery (quest recognition for returning guests)
remarkt (about reservation and guests)

Application	Internal	External	Purpose of processing	1a	1b	2	3	4	5	6	7	8
Roomchecking		X	c, li	X					X			X
PROTEL		X	c, li, lo	X	X	X	X	X	X	X		X
AFAS		X	c, li	X	X					X		
MAILCHIMP		X	li	X								
HOTELKIT		X	c	X								X
RIJNJA		X	c	X	X						X	X
N200		X	c, li	X	X	X			X	X		X
YOURTICKETPROVIDER		X	c, li	X	X							

No Management informatie is collected

Data sheet Internal and external bookers

List of external bookers and type of contract		type of contract
1.	Booking.com	unilateral, no apply to privacy legislations terms its the liability of both parites
2.	hotels.nl	
3.		
4.		
5.		
6.		

List of internal bookers within NHL Stenden		comments
1.		
2.		
3.		
4.		
5.		
6.		