

The Spot Hostel Privacy & Cookie Policy:

The Internet site, www.thespohostel.com, is the official site of Tel Aviv the port resident (2016) the spot hostel (hereinafter, “the hotel”). The Website displays various information regarding The Hotel, and allows you the user (hereinafter: “The User”) to make a reservation for staying at The Hotel and order a various of related services.

The spot hostel takes privacy as a tremendously important issue and recognizes the extent of what this idea means. We as an entity strive to deliver outstanding products, services, and experiences to you while processing your personal information.

This Privacy & Cookie Policy will inform how we collect, process and protect your personal data. This includes when you make a booking, request information from us, contact us, use our website, and connect with us via social media, through our contact center or hotel, or any other involvement we have with you, regardless of where you are located. It also tells you about your privacy rights and how the newest European law (General Data Protection Regulation) securely protects you.

1: IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY POLICY & COOKIE POLICY

The goal of this privacy policy is to provide you with detailed information on how the spot hostel collects and processes your personal and sensitive data in our interaction with you, including in providing accommodation and other services to you, including any data you may provide through our website, including by *cookies*.

By using any of our products or services and/or by agreeing to this Statement, e.g. in the context of registering for any of our products or services you understand and acknowledge that we will collect and use personal information as described in this following Statement.

DATA CONTROLLER

The spot hostel is the main controller in regard to the information we receive. This entity operates as the “data controller” and this means a regulated group who (either alone or jointly or in common with other groups) determines the purposes for which and the manner in which any personal data are to be processed. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

DATA PROCESSOR

There is a Data Processing Agreement that is properly disclosed. This agreement revolves around processing of personal data and regulates the Data Processor (whoever that party may be) who carries out the role of processing personal data on behalf of **The spot hostel** (the "Data Controller") and is most importantly GDPR compliant as well.

CONTACT INFORMATION

Email address:

office@thespohostel.com

Postal address/Telephone number:

- 1) Address: hataarucha 3 Tel Aviv

You have the right to make a serious complaint at any time to the relevant data protection authority. We would, however, appreciate the chance to deal with your concerns before you approach the Authority so please contact us in the first instance.

CHANGES TO PRIVACY POLICY

Last updated: 22.12.2020.

The spot hostel does in fact reserve the right to update the Privacy policy from time to time. Any changes to our Statement will become effective upon posting of the revised Statement on the site. Use of the site, any of our products and services, and/or providing consent to the updated Statement following such changes constitutes your acceptance and consent of the revised Statement then in effect.

THIRD-PARTY LINKS

Our website may also include links to third-party websites, plug-ins, and applications. By clicking on those links, you may enable third parties to collect or share data about you. It is your responsibility to understand **the spot hostel** does not control these third-party websites nor their data processing. When you leave our website, we encourage you to read the privacy notice of every third-party website you visit as well to understand how they process data.

2: THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, is any information about an individual from which that individual can be identified. Personal data does not include anonymous data, data where the identity has been removed.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth, place of birth, nationality, passport or ID card number, gender and vehicle registration plate.
- **Contact Data** includes home address, billing address, email address, and phone numbers
- **Booking and Transaction Data** includes bank account or payment details and other details, including reason of stay, stays and other services you have purchased from us, and comments and responses to surveys you provided relating to our service.
- **Technical Data of your Visit to this Website** includes internet protocol address, your login information, browser type and version, time zone setting and browser, location plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Special Requirements Data** includes disability, health, religious, or dietary requirements if you notify us of any special needs and provide this information.
- **Usage Data** includes information about how you use our services and social media platforms.

We will not collect all the data referred to above in each case, but only such data required for the specific *legitimate interest*.

We will only collect **Special Categories of Personal Data** about you to the extent that it is voluntarily submitted by you or on your behalf and is needed to satisfy your requirements during your stay with us or other use of our facilities or services. However, we may also need to process such information in the event of an accident or a medical or other emergency during your stay or your other use of our facilities.

We obtain limited information about **children** who are booked in to stay at our hotel (number, age, and where legally required other data such as name, date of birth, place of birth).

IF YOU FAIL TO PROVIDE PERSONAL DATA

If you fail to provide personal data when requested, we may not be able to follow through with the contract we have or are trying to construct with you. In this case, we may not be able to proceed with the booking or other service you have with us, however we will notify you if this is the case at the time.

3: HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Booking Data, and Transaction Data by filling in forms or by corresponding with us by mail, phone, email, via our website, on social media or otherwise. This includes personal data you provide when you:
 - subscribe to our newsletter and/or other publications;
 - request a brochure or other promotional or marketing materials to be sent to you;
 - enter a competition, or respond to a promotion or survey; or
 - give us some feedback.
 - make a booking at our hotel, whether for overnight stays or conferences;
 - check in to one of our hotel;
 - attend a function, conference, or otherwise use the facilities at one of our hotel;
- **Automated technologies or interactions.** As you interact with us via our website or social media accounts, we may automatically collect Technical Data about your browsing, equipment, and patterns. We collect this personal data by using cookies, e-mails, server logs and other technologies. Please see our Cookie Policy below for further details.
- **Third parties.** We may collect personal data about you if a booking is made for you by a travel agency, online portal or another third person, who may be a family member or travelling companion, or agent or other intermediary, working for you or, where you are travelling on business, your employer or other third party on your behalf, such as tour operators, travel agencies, and Global Distribution Systems or other similar, Contact, Booking and Transaction Data from providers of technical, payment and delivery.
- **Business Contacts.** If you are a business contact of the spot hostel , we may receive your data as you interact with our website, from trade fair visit/ workshops, personal

meetings, corresponding with you through emails and phone, through contractual negotiation and agreements

- **Other third parties or publicly available sources.** We may receive personal data about you from third parties and public sources as set out below:
 - Social Media Analytics providers
 - Advertising networks
 - Web interaction technology providers
- **Monitoring.** We may monitor and/or record:
 - phone calls (incoming calls to our hotel)
 - transactions at all points of contact
 - social media and web traffic

These steps are to ensure that we carry out your instructions properly, for training purposes and to improve our services, and to guarantee security and prevent fraud. For the greater security of our guests and patrons, and to prevent and detect crime, we use CCTV (a TV system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes) in and around our premises.

4: HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law permits us to. Most commonly, we will use your personal data in the following circumstances (each a "**Legal Ground**"):

- **Consent:** Where you willing give us your explicit consent to do so.
- **Legitimate interests:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- **Comply with obligation:** Where we need to comply with a legal or regulatory obligation.
- **Performance of contract:** Where we need to provide the booked accommodation and services, or otherwise perform the contract we have entered into with you, or in the process of entering with you.
- **Vital interests:** In the case of any accident emergency, to protect your or another individual's interests, where you or they are not able to give consent.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We collect and process your personal data for the purpose of:

- To protect and administer our business including our website, including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, to deliver more relevant content and advertisements on our website to you and understand or measure the effect of the advertising we offer to you, and to make recommendations to you about our services that may be of interest to you

Legal grounds: Legitimate interest (to develop our business and do marketing), Performance of Contract (where website is used to book or deliver service).

- Making a booking, including reserving disability adapted accommodation, to provide accommodation and other services to you including meeting your specific health, disability, dietary and religious requirements, to manage your stay at the hotel and to monitor the use of our services, and to collect and recover money owed to us

Legal grounds: Performance of Contract, Consent (for meeting your specific health, disability, dietary and religious requirements), Legitimate interest (to improve our services)

- To deal with issues or complaints arising out of our relationship with you, and to prevent or detect crime, including fraud, to manage our relationship with you which will include:
 - Notifying you about changes to our terms or privacy policy
 - Asking you to leave a review or take a survey, or participate in competition
 - To better our service to you

Legal grounds: Legitimate interest (to monitor and improve our services, to prevent crime and fraud, to keep our documents up to date)

- To use data analytics to improve our website, services, marketing, customer relationships and experiences

Legal grounds: Consent (for use of cookies and analytics); Legitimate interest (to develop our business and do marketing)

- To deal with an accident or medical or other emergency

Legal grounds: Vital Interest

- To comply with local legislation (for example, storing of accounting documents or registration cards)
Legal grounds: Comply with obligation

We do not undertake automated decision by processing your personal data.

MARKETING/PROMOTIONAL OFFERS

We may use your contact information (mail address, fax number, email address or phone number) according to our legitimate interests, to inform you in accordance with any preferences you have expressed, about our products, services, offers via email, online advertising, social media, WhatsApp, telephone, text message (including SMS and MMS), push notifications, in-app alerts, postal mail, our customer service call center, and other means. (will not share your e-mail address with third parties for promotional purposes, except by permission.)

Where you have agreed to receive it and provided your consent, we may use your Identity, Contact, Technical, Usage and Sheba Residence Club or other Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you.

You can revoke your consent and unsubscribe from our marketing communication at any time by following the opt-out links on any marketing message sent to you or by Contacting us at any time.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see below our Cookie Policy

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please Contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5: DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the categories of parties set out below for the purposes set out above.

- Tax and customs authorities, public registry authorities, regulators and other authorities;
- Our business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; these include contractors who provide services to you in their own name such as the third-party provider offering services, as well as our other providers acting as processor on our behalf and as instructed by us;
- analytics and search engine providers that assist us in the improvement and optimization of our services and website (as processor acting on our behalf and as instructed by us);
- banks, lawyers, auditors and insurers;
- entities involved in payment processing, credit checking and anti-fraud activities, crime prevention/detection, risk assessment and management and dispute resolution.

Where these third parties are our processors, we require them to respect the security of your personal data and to treat it in accordance with the law.

We do not allow our carefully selected third-party processors to use your personal data for their own purposes and only permit them to process your personal data for specific purposes and in accordance with our instructions. Some of the third parties mentioned above, for example many professional advisers and authorities, are controllers who, like us, are subject to specific obligations under data protection law, and who will have their own privacy notices setting out how they deal with personal data.

6: PROTECTING PERSONAL INFORMATION

The spot hostel will take reasonable measures to: (i) protect personal information from unauthorized access, disclosure, alteration or destruction, and (ii) keep personal information accurate and up-to-date as appropriate. **The spot hostel** maintains a PCI compliance program and an IT compliance program. This compliance program generates audit reports concerning the adequacy and effectiveness of **the spot hostel**

IT internal controls, including a PCI Attestation of Compliance report addressing the IT general controls over systems that support certain accounting and financial reporting. In the event of a security incident, **the spot hostel** will notify regulators and/or consumers as required by applicable laws or regulations.

We also seek to require our affiliates and service providers with whom we share personal information to exercise reasonable efforts to maintain the confidentiality of personal information about you. For online transactions, we use reasonable technological measures to protect the personal information that you transmit to us via our site. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

For your own privacy protection, please do not send payment card numbers or any other confidential personal information to us via email.

We will not contact you by mobile/text messaging or email to ask for your confidential personal information or payment card details. We will only ask for payment card details by telephone when you are booking a reservation or promotional package. We will not contact you to ask for your **The spot hostel** account log-in information. If you receive this type of request, you should not respond to it. We also ask that you please notify us at **office@thespohostel.com**. We have put in place procedures to deal with suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7: INTERNATIONAL TRANSFERS

Though we do not seek actively to transfer personal data outside the EEA (The European Economic Area is the area in which the Agreement on the EEA provides for the free movement of persons, goods, services and capital within the European Single Market) or countries with an adequate data protection, some of the external third parties we deal with are based outside the EEA or process personal data outside the EEA, so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we look to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (as set out above, this especially applies for Switzerland and Israel).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. We do this for example in connection with our providers for booking through travel agents in the US.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please Contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8: DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only hold on to your personal identifiable information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any accounting, legal, or reporting requirements.

In some situations you can request to delete your data.

In some circumstances we may anonymize your personal information, therefore it can no longer be associated with you, for statistical or research purposes in which case we may use this information indefinitely without further notice to you.

9: YOUR LEGAL RIGHTS

Under certain circumstances, you have some or all rights under certain data protection laws in relation to your personal data specifically if you are resident of EEA.

- **Request for deletion of your personal data.**
- **Request correction of your personal data.**
- **Object to processing of your personal data.**
- **Request restriction of processing your personal data.**
- **Request transfer of your personal data.**
- **Right to withdraw consent.**

If you wish to exercise any of the rights set out above, please Contact us.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to enable us to deal with your request or to speed up our response.

For any processing that is based on your consent (mainly applying to online advertising to you), you have the right to withdraw such consent at any time by Contacting us.

It is important that the personal data we hold about you is accurate, please keep us updated if your personal data changes during your relationship with us.

We will respond to all such requests within 30 days of our receipt of the request, unless there are extenuating circumstances. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity.

YOUR LEGAL RIGHTS

You have the right to:

- **Request for deletion** of your personal data. This allows you to ask us to delete personal information where there is no good reason for us continuing to use and process it. You also have the ability to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
 - Note, however, that we may not always be able to comply with your request of erasure for specific legal or legitimate reasons which will be notified to you, if applicable, at the time of your request.
- **Request access to your personal data.** This allows you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of your personal data** that we hold about you. This enables you to have any inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
- **Object to processing** of your personal information where we are relying on our legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations: (a) if you want

us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only is applicable to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on your consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. Note, if you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

10: WEBSITE COOKIES AND TRACKING PRIVACY POLICY

The **spot hostel** operates this website (www.edeninn.co.il) navigate our website. **The spot hostel** takes the protection of users and follows the legally valid regulations regarding data protection. This Website Cookies and Tracking Privacy Policy outlines how we use any personal information we collect about you and your rights to access and correct the personal information we hold about you.

CONSENT

By using this Website, you consent to the use of cookies in accordance with this Cookies Policy. You will have seen a pop up to this effect on your first visit to this website; although it will not usually appear on subsequent visits you may withdraw your consent at any time by following the instructions below.

MANAGING COOKIES AND OTHER TECHNOLOGIES

If you do not agree to the use of these cookies, you have the right to disable them by following the instructions for your browser. Alternatively, you may wish to visit for example www.allaboutcookies.org, which contains comprehensive information on how to manage cookies on a wide variety of desktop browsers.

Please be aware that some of the services will not function so well if cookies are disabled.

Some browsers make it possible for you to signal that you do not want your internet browsing

activity to be tracked. Disabling tracking may interfere with some uses of the Website and the services provided on the Website.

You can also find a good summary of how to manage Flash Cookies at http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html.

You can also control tracking Cookies by installing browser extensions like Ghostery: <https://www.ghostery.com/products/>

If you want to clean out all of the Cookies left behind by the websites you have visited, here are links where you can download programs that clean out tracking Cookies:

http://www.lavasoft.com/products/ad_aware_personal_security.php
<http://www.spybot.info/en/download/index.html>

You can learn more about interest-based advertising and opt out of our vendors' and other advertisers' use of Cookies to tailor content or advertising to you by visiting http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/choices>.

You may opt out of tracking by Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout?hl=en-GB>

WHAT IS A COOKIE?

Cookies are small text files that are stored on your computer or mobile device ("device") when you visit a website. Cookies alone cannot be used to disclose your individual identity to us, though in some cases we may tie Hilton or third-party Cookies to personal information you have provided to us or that we have otherwise obtained about you. Cookies may be used on the Site in order to improve your experience. For example, we will use Cookies to:

- Remember your user name and password for future visits so that log-in is easier and faster;
- Remember your language and other preferences;
- Ensure you obtain all requested information;
- Provide a safe and secure service for online transactions;
- Track your response to advertisements and website or app content for analysis and the number of times we send you the same advertisement;

- Measure how many people use the Site, and how they use it, so that we may keep it running quickly and efficiently; and
- Help us and others deliver communications and content to you that are relevant and responsive to your interests and location.

Below we explain the different types of Cookies that may be used on the Site.

- **Essential Cookies.** Essential Cookies are necessary for the Site to work, and enable you to move around it and use its services and features. Disabling these Cookies may make the services and features unavailable.
- **Functional Cookies.** We use Functional Cookies to save your settings on the Site— settings such as your language preference, or booking information you have previously used when booking a hotel with us. We also use Functional Cookies to store such things as the last hotel you searched for, so that you can easily find it the next time you visit. Some Functional Cookies are essential to viewing maps or videos on our Site. We also use "Flash Cookies" for some of our animated content.
- **Session Cookies.** These types of Cookies are stored only temporarily during a browsing session, and are deleted from your device when you close the browser. We use Session Cookies to support the functionality of the Site and to understand your use of the Site—that is, which pages you visit, which links you use and how long you stay on each page.
- **Persistent Cookies:** These types of Cookies are not deleted when you close your browser, but are saved on your device for a fixed period of time or until you delete them. Each time you visit the Site, the server that set the Cookie will recognize the persistent Cookie saved on your device. We and others use persistent Cookies to store your preferences, so that they are available for your next visit, to keep a more accurate account of how often you visit the Site, how often you return, how your use of the Site may vary over time and the effectiveness of advertising efforts.
- **Advertising Cookies** allow us and other advertisers to show you the most relevant products, offers, and advertisements on the Site and third-party sites, or through emails or other message platforms. For example, some Advertising Cookies help our service providers and other advertisers select advertisements that are based on your interests, including those expressed or inferred by visits to our websites or apps or across other websites, online services, and apps over time. Others help prevent the same advertisement from continuously reappearing for you. These types of Cookies also help us provide you with content on the Site that is tailored to your interests and needs.

As noted below, some Analytics Cookies and Other Technologies are used in part to facilitate advertising.

- Advertising Cookies also include **Social Plug-In Cookies.** Social Plug-In Cookies are used to share content from the Site with members and non-members of social media networks such as Facebook, Twitter, YouTube and Pinterest. These Cookies are usually set by the social networking provider, enabling such sharing to be smooth and seamless.

- **Analytics Cookies** collect information about your use of the Site, and enable us to improve the way it works. These Cookies give us aggregated information that we use to monitor site performance, count page visits, spot technical errors, see how users reach the Site, and measure the effectiveness of advertising (including emails we send to you).
- **Other Technologies** may be used for the same purposes as our Cookies, to allow us and third parties to know when you visit the Site, and to understand how you interact with emails or advertisements. Through Other Technologies, non-personal information (e.g., your operating system, your browser version, and the URL you came from) or aggregate information may be obtained and used to enhance your experience and understand traffic patterns.

Use of IP addresses and web logs

We may use your IP address and browser type to help diagnose problems with our server, to administer our Website, and gather broad demographic information. This is to better improve the service we offer to you.

An IP address is a numeric code that identifies your computer on the internet.

We may perform IP lookups to determine which domain you are coming from (e.g. google.com) to more accurately gauge our users' demographics.

COOKIES POLICY DOES NOT COVER THIRD PARTY WEBSITES

Please note that this cookies policy does not apply to, and we are not responsible for, the privacy practices of third party websites which may be linked to this Website.