

Xior Student Housing (hereafter: **we, us** or Xior) is committed to protecting and respecting your privacy.

This policy sets out the basis on which any information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will use it. By visiting [www.xior.es](http://www.xior.es) you are accepting and agreeing to the practices described in this Privacy Policy.

Our Privacy Policy contains the following sections:

1. Information we collect from you;
2. Cookies;
3. Uses made of your information;
4. Disclosure of your information;
5. Transfer of your information;
6. Your rights;
7. Security of collected information;
8. Retention of your information;
9. External websites/apps;
10. Agreement with collection and use of your information – changes to our Privacy Policy;
11. Identity of data controller – contact details.

1. Information we collect from you

We will collect and process the following information about you:

- Information you provide us.

This is your personal information that you provide us by filling in forms on [www.xior.es](http://www.xior.es) (hereafter: **our website**), using our application “Xior Student Housing” (hereafter **our app**) or by corresponding with us by phone, email or otherwise. It includes information you provide to us when you fill out forms, subscribe to the newsletter, participate in competitions, make inquiries or provide us with information regarding a rental or other request, or a job application. The information you give us may include your name, gender, date of birth, address, national registration number, passport identification number, email address, phone number, financial and credit card information, name and contact details of parents (or legal guardian) as well as details regarding current studies (place and field of study) and, as the case may be, professional information (such as current and previous employment)].

- Information we collect about you while visiting our website.

During each of your visits to our website and use of our app we will automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- your device ID;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products/services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page and any phone number used to call our customer service number;

- Information we receive from other sources.

This is information we receive about you if you use any other website/application than ours that advertises or uses our services. We are working closely with third parties (including, amongst others, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers) and we will collect and process the information we receive from them.

## 2. Cookies

Our website uses cookies. This helps us to provide you with a good experience when you browse on our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them, see our [Cookie Policy](#).

## 3. Uses made of your information

We use the information we hold about you in the following ways:

- Information you give to us.

We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us;

- to conduct and appraise you of the results of any competitions in which you have participated;
- to comply with verification procedures regarding applicable eligibility for student housing (including through verification of data with education institutions);
- to provide you with information about other services we offer that are similar to those that you have already used or enquired about;
- to review and assess your job application;
- to provide you with information about goods or services we feel may interest you;
- to notify you about changes to our services;
- to ensure that the content from our website is presented in the most effective manner for you and for your computer/device.

- Information we collect about you while visiting our website.

We will use this information:

- to administer our website and app and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website and app to ensure that content is presented in the most effective manner for you and for your computer/device;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our website and app safe and secure;
- to measure or understand the effectiveness of advertising we deliver to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our website and app about goods or services that may interest you or them.

- Information we receive from other sources.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for following purposes:

- to measure or understand the effectiveness of advertising we deliver to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our website and app about goods or services that may interest you or them.

#### 4. Legal basis

Your information is being collected and processed on the following legal bases:

- If it is necessary for performing the agreement between us and you, e.g. a rental agreement, a participation in a competition, an employment agreement, or other agreements;
- If it is necessary for pursuing our legitimate interests, considering these interests are not overridden by your fundamental rights and freedoms, e.g. we use your information to know your preferences so as to be able to better personalize our product offerings, to prevent fraud and to secure our website and app.
- When you consented to this, e.g. if you have given your prior express consent thereto we may use your email address for sending you marketing materials.

## 5. Disclosure of your information

You agree that we have the right to share your information with selected third parties including:

- our affiliates/other entities within the Xior group;
- our business partners, including Escape Advertising, Well Communications, UPR Corporate Communications and our local external rent management offices;
- public authorities (including judicial and police authorities);
- banks and insurers;
- our professional advisors (e.g. our auditors, legal advisors, financial advisors and employer's social accounting secretariat (*sociaal secretariaat*) SD Worx);
- providers of recruitment related services;
- our suppliers of IT related services, e.g. 4 Business Software;
- our suppliers of marketing related services;
- providers of online payment services;
- analytics and search engine providers that assist us in the improvement and optimisation of our site, e.g. Google;

We will also disclose your information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets;
- if Xior or substantially all of its assets are acquired by a third party, in which case information held by it about its customers may be one of the transferred assets;
- if we are under a duty to disclose or share your information in order to comply with any legal obligation or to protect the rights, property, or safety of Xior, our customers, or others. This includes exchanging information with public authorities (including judicial and police authorities) in the event of, for example, a cyber security incident;
- if that is appropriate to achieve any of the purposes set out in section 3 of this Privacy Policy.

## 6. Transfer of your information

We may transfer your information to a destination outside the European Economic Area (the EEA), including to the United States of America if that is appropriate (i) to achieve any of the purposes set out under section 3 and/or (ii) to disclose your information to a third party in accordance with section 4 of this Privacy Policy.

If we transfer your information outside of the EEA, we will make sure that your information is protected by the following safeguards:

- the laws of the country to which your information is transferred ensure an adequate level of data protection (Article 45 GDPR); or
- the transfer is subject to data protection clauses approved by the European Commission (Article 46.2 GDPR) or is subject to the EU-US Privacy Shield.

If you wish to receive more information relating to the transfers of your information and/or the safeguards that have been implemented (including on how to receive a copy thereof), you can contact us through the contact details set out in section 12 below.

## 7. Your rights

You have certain rights regarding the information we hold about you. These rights can be exercised by contacting us as set out below:

- you have the right to access the information we keep about you – this is because we want you to be aware of the information we have about you and to enable you to verify whether we process your information in accordance with the applicable data protection laws and regulations;
- you have the right, under certain circumstances, to block or suppress further use of your information. When the processing is restricted, we can still store your information, but we can no longer use it;
- if your information is inaccurate or incomplete, you have the right to request the rectification of your information;
- you have the right, under certain circumstances, to request the deletion or removal of your information from our systems;
- you have the right to lodge a complaint about the way we handle or process your information with your national data protection authority;
- if our processing of your personal information is based specifically on your consent, you have the right to withdraw that consent at any time. This includes your right to withdraw consent to our use of your information for direct marketing purposes;
- you have the right to obtain from us, under certain circumstances, your information in a structured, commonly used and machine readable form so you can reuse it for your own purposes across different services. For example: if you want to work with a different service provider, this enables you to move your information easily and in a secure manner to this new service provider.

You also have the right to object to certain types of processing, including processing for direct marketing purposes.

However, note that we may need to retain certain information, for example for legal or administrative purposes (e.g. keeping of accounting records).

For all requests set out above, please send us an email with “data privacy request” in the subject line and include a copy of your identity card or another proof of your identity (e.g. driver’s license) to help us prevent unauthorised individuals from accessing, changing or deleting your information. We will respond to your request as soon as practically possible. If we need more than one month (from receipt of your request) to respond to your request, we will come back to you and let you know.

#### 8. Security of collected information

We have implemented a number of security features throughout our website and our app in order to prevent the unauthorized release of or access to collected and/or received information. We have endeavored to create a secure and reliable website and app for you, but note that the confidentiality of any communication or material transmitted to or from us or any other party via our website, our app or email cannot be guaranteed. We accept no responsibility or liability for the security of information transmitted via these methods.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website or our app, you are responsible for keeping this password confidential. We ask you not to share a password with anyone, not to reuse passwords across other sites and not to use common dictionary words or otherwise obvious passwords.

#### 9. Retention of your information

The information we hold about you will be retained in a manner consistent with the applicable data protection legislation. In any event, your information shall not be kept longer than is necessary to achieve the purposes stated in this Privacy Policy.

In particular, we will only keep:

- your information relating to your rental agreement for as long as needed to complete all invoicing and payment processes in respect of such rental agreement, as well as comply with recordkeeping and auditing procedures;
- your information relating to your online query for as long as needed to provide you with the requested information;
- your information regarding competitions for as long as needed to administer the relevant competition;

- information provided in subscribing for newsletters for as long as you do not unsubscribe from such newsletter.

unless:

- the processing of your information is necessary in connection with any actual or potential dispute (e.g. we need this information to establish or defend legal claims), in which case we will keep your information until the end of such dispute; and/or
- the retention is necessary for us to comply with any legal or regulatory obligation (e.g. for tax purposes), in which case we will keep your information for as long as required by that obligation.

#### 10. External websites

Our website and our app may, from time to time, contain links to and from websites and/or applications of our partner networks, advertisers and affiliates. To the extent that hyperlinks or banner advertisements incorporating hyperlinks are utilized to access third party websites and/or applications, you should be aware that these third party websites and/or applications are not controlled by us and have their own privacy policies. Therefore, they are not subject to this Privacy Policy and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to these websites and/or applications.

#### 11. Agreement with collection and use of your information – changes to our Privacy Policy

By using this website and/or app, you acknowledge that you have read the terms of this Privacy Policy and that you agree with the collection and the use of your information as set out above.

We may amend this Privacy Policy from time to time. Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to the Privacy Policy. Your continued use of this website following the posting of changes to this Privacy Policy will indicate your acceptance of these changes. This Privacy Policy was most recently updated on 16 May 2023.

#### 12. Identity of data controller – contact details

The data controller under this Privacy Policy is Xior Student Housing NV, with company number BE0547.972.794 and having its registered offices at Frankrijklei 64-68, 2000 Antwerp.

Questions, comments and requests regarding the Privacy Policy must be addressed to: [gdpr@xior.be](mailto:gdpr@xior.be), +32 (0) 3 257 04 89 or our registered offices.

#### 13. Share your Xior posts on social media

## **We are curious about your Xior posts on social media!**

For this reason we may ask you to share your photos or videos on our own social media channels which are facebook, Instagram, linkedIn, twitter, tiktok, pinterest and our website We also like to integrate these photos and videos in our annual financial report, newsletters, mailings, flyers and presentations.

By answering our request affirmatively or by tagging Xior with @xiorstudenthousing or @xior\_spain you give us permission to use your photos or videos on our social media channels and other communication tools for marketing and/or advertising objectives. We are allowed to use these photos and videos until you withdraw your permission in writing.

By giving your consent, you give Xior a non-exclusive, royalty-free, worldwide license to use and share your photos and videos for marketing purposes, including the right to reproduce, distribute, modify and edit your photos. You acknowledge and guarantee that you own the rights to the submitted material, and that you have the permission of all persons who appear in the photographs.

If you wish to withdraw your permission, please send us an email to: [gdpr@xior.be](mailto:gdpr@xior.be) and we will remove your photo or video from our channels within 14 days. If we have used your photo in newsletters, flyers or presentations, the photo cannot be deleted. However, Xior guarantees that the photo will not be used any longer.

We look forward to share your Xior posts!