

Data Protection Information in accordance with Art. 13 GDPR

Controller for data processing activities

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The logo for POHA, consisting of the letters 'POHA' in a large, bold, sans-serif font.

Purpose of data processing activities

- Operation of coliving flats, co-working spaces, serviced flats and related operations as well as all related business.
- Operation of a customer service centre for the purpose of recording and implementing reservations.
- Secondary purposes are accompanying or supporting functions in personnel, agent, supplier and service provider management.
- Video surveillance is only used at the operating sites to collect evidence in the event of vandalism, burglary, robbery or other criminal offences. The presence and use of video cameras is indicated by appropriate warning notices. Digitised recordings of booking meetings for documentation, evidence and training purposes will only be made with the express permission of the other party.
- Storage and processing of personal data for our own purposes and on behalf of individual companies in accordance with existing service agreements within the group of companies.
- Data is collected, processed and used for the purposes listed above.

Categories of personal data

Personal data is essentially collected, processed and used for the following groups of natural persons, insofar as this is necessary to fulfil the stated purposes:

- Guests, residents and member data (in particular address data, reservation and booking data, customer requests, billing data, demographic data if specified)
- Customer data (esp. address data, contract data, billing and service data, contact details, documents proving creditworthiness)
- Prospective tenant data (in particular interest in accommodation, flat and space rental interest, address data)
- Employee data, applicant data, data from pension providers (best personnel and salary data)
- Agent/broker/agency data (especially address, billing and performance data)
- Business partners, external service providers (in particular address, billing and performance data)
- Data on suppliers (especially address, billing, performance and functional data)
- Non-assignable groups of persons: Video recordings, insofar as these are required to fulfil the purposes listed under point 5.

Legal basis for data processing activities

- Contract (accommodation contract, service contract, rental contract, service contract, etc.)
- Legal standard(s) (e.g. federal registration law, etc.)
- Consent (e.g. in the context of accommodation)
- Balancing of interests (e.g. in the context of building surveillance)

Operators of serviced flats, coliving residences and coworking spaces as well as other accommodation providers may collect personal data of their guests/residents/members and store it in automated

processes insofar as this is necessary within the framework of the accommodation contract/lease agreement. As a rule, this also includes billing data on food and beverages or booked cleaning services and/or other services. Operators of serviced flats and coliving residences, coworking spaces and hotels are obliged by registration law to request information about the place of residence, date of birth and nationality of their guests/residents/members and their accompanying persons.

Categories of recipients of personal data

a) Internal

Internal departments involved in the execution and fulfilment of the respective business processes (e.g. personnel administration/control, accounting, marketing, sales, IT organisation and the central reservation service/customer service centre).

b) External

- Public authorities that receive data due to legal regulations (e.g. social insurance agencies).
- External contractors (service providers)
- Other external bodies (e.g. credit institutions, brokerage agencies in the context of intermediary activities, companies belonging to the group of companies insofar as the data subjects have given their written consent or a transfer is permitted due to an overriding, legitimate interest), as well as partner companies in the context of the order activity placed by the customer.

Transfer of data to third countries

There is **NO** transfer of personal data to third countries of the EU and this is also not planned.

Further information within the meaning of Art. 13 para. 2 GDPR

a) Rights of data subjects

You have the right to:

- Information about your stored and processed personal data
- Rectification of your personal data stored by us
- Erasure of your personal data that is no longer required
- Restriction (blocking) of the use of your personal data
- Objection (especially in the case of previously given consent)
- Data portability

b) Storage periods

The legislator has issued various retention obligations and periods. After these periods have expired, the corresponding data and data records are routinely deleted if they are no longer required for contract fulfilment (guest, rental and service contracts). The commercial or financial data of a completed financial year is deleted after a further ten years in accordance with legal regulations, unless longer retention periods are prescribed or required for legitimate reasons. In the area of personnel administration and control, shorter deletion periods are utilised in special areas. This applies in particular to rejected applications or warnings. If data is not affected by this, it is deleted without being requested to do so when the stated purposes no longer apply. Registration forms are stored in accordance with the applicable registration law in the individual hotel and accommodation establishments for the minimum period prescribed by law and then destroyed under special precautionary measures in accordance with data protection regulations.

c) Revocation of consent

If your personal data is stored on the basis of your personal consent, you can revoke this consent. Your revocation will then apply from the time of revocation.

d) Right to lodge a complaint with the competent data protection supervisory authority

In accordance with Art. 77 GDPR, you have the right to lodge a complaint with the competent data protection supervisory authority if you are of the opinion that the processing of your personal data violates the GDPR, the BDSG or other national data protection regulations.

Please direct any complaints to the data protection supervisory authority responsible for our company:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen
P.O. Box 20 04 44
40102 Düsseldorf
Telephone switchboard: +49 (0)211 / 38424 – 0
poststelle@ldi.nrw.de

e) Provision of personal data and the consequences of non-provision

The provision of your personal data is necessary for the fulfilment of the aforementioned purpose or we are obliged to collect this data in accordance with the relevant legal standards. Without this data, we cannot conclude or fulfil the contractual relationship. If there are legal obligations to collect this data, we would be in breach of applicable data protection law, which could lead to sanctions and/or fines being imposed on our company.

f) Automated decision-making

Automated decision-making does not take place and is not planned.

Information on the security of your personal data

Our company uses technical and organisational security measures within the meaning of Art. 32 GDPR in accordance with the recognised state of the art and the nature of the scope, circumstances and purposes of the processing in order to protect the data stored and managed by us against accidental or intentional loss, manipulation, destruction or access by unauthorised persons. In doing so, we are guided by the technical and organisational recommendations of the BSI. The security measures used are continuously adapted in line with technological developments. We ensure that all data relevant to data protection is always stored on secure systems in Germany. Access to this data is only possible for a small number of authorised persons who are responsible for technical, administrative or editorial support. The authorised group of persons is known enumeratively and is continuously trained in a special way. This includes, in particular, basic security training in the areas of IT security and data protection. The company has taken the necessary technical measures to achieve the goal of IT security in the area of personal data processing and will adapt them to new IT challenges as required. The aim of the measures to maintain IT security is to defend against basic threats with effective and appropriate measures.

Status of data protection information in accordance with Art. 13 GDPR

Aachen, October 2024