

CCTV Policy

1. Purpose

citizenM operates a Closed-Circuit Television surveillance system (“CCTV”) across all hotels to foster a safe and secure environment for our staff, guests and visitors. The aim of this policy is to establish clear guidelines and procedures for the appropriate use, management, and upkeep of CCTV within our organization.

2. Scope

This policy is applicable to all staff, guests and visitors of our hotels who either have access to or are recorded by CCTV cameras on our premises.

3. CCTV Location

CCTV cameras will be strategically positioned in areas where there is a legitimate need for surveillance, such as the hotel entrance, reception area, public areas and hallways. Cameras will not be placed in private areas such as guest rooms, changing facilities, or restrooms. Whenever feasible, signage will be prominently displayed to notify individuals of the presence of CCTV surveillance.

4. Purpose of CCTV Recordings

CCTV recordings shall solely serve legitimate business purposes, primarily for security and safety, including but not limited to:

- monitoring and detecting suspicious or unauthorized activities;
- acting as a deterrent against criminal behavior;
- investigating accidents or incidents occurring within public areas; and
- assisting law enforcement authorities as required in their investigations.

Any unauthorized use of CCTV recordings for personal reasons or purposes not outlined in this policy is strictly prohibited.

5. Data Security

CCTV recordings will be securely stored, with access restricted to authorized personnel solely for the aforementioned purposes. All authorized personnel must sign a confidentiality agreement pertaining to the use of CCTV recordings, which may be integrated into their employment contracts. Access to CCTV recordings is role based taking into account the employees' responsibilities and areas of authority.

Measures will be implemented to prevent loss or unlawful processing of CCTV recordings, ensuring an appropriate level of security commensurate with associated risks. Photography or filming of CCTV recordings is strictly prohibited.

6. Disclosure of CCTV Recordings

Generally, CCTV recordings will not be disclosed to third parties without consent from

individuals whose images have been recorded unless the requester's needs outweigh those of the individuals concerned. If CCTV recordings contain identifiable images of other individuals besides the requester, it may be necessary to obscure or withhold such images if their disclosure would disproportionately affect the rights and freedoms of those individuals.

Disclosure to law enforcement authorities will only occur upon presentation of a subpoena or equivalent documentation, or as mandated by a court order. Limited exceptions may apply for establishing, exercising, or defending legal rights including those of others, seeking legal advice, or legal proceedings.

Disclosure of CCTV recordings will be conducted through secure transmission or delivery methods.

7. Data Retention

CCTV recordings will typically be retained for a limited period, usually 30 days, unless required for specific incidents or investigations necessitating longer retention. Upon expiration of the retention period, recordings will be securely erased unless needed for ongoing investigations or legal proceedings.

8. Guest Inquiries and Data Subject Rights

Guests and visitors seeking information regarding this policy or recordings can contact privacy@citizenm.com or submit a written request to citizenM Operations Holding B.V., attn. Legal Department, Leidseweg 219, 2253 AE Voorschoten, the Netherlands. Our Data Protection Officer can be reached at dpo@citizenm.com. All requests will be processed in accordance with our Privacy Statement.

9. Incidents

In case of incidents, CCTV recordings may be analyzed to detect unauthorized behavior or further investigate suspicious activities, if reasonably suspected. Relevant recordings will be retained as necessary for ongoing investigations and subsequent measures.

10. Compliance

All CCTV operations will comply with applicable laws and regulations, including data protection and privacy laws.

Employees involved in CCTV operation or management will receive relevant training on their responsibilities, legal requirements, and best practices. Violations of this policy may result in disciplinary actions, including termination of employment or legal action, depending on the severity of the breach.

citizenM's General Counsel serves as the primary contact for CCTV and is responsible for day-to-day compliance with this policy's requirements, including decisions on CCTV recording, usage, and disclosure.

This policy is intended as a general guideline and may be subject to change based on specific organizational requirements and legal considerations.

citizenM Operations Holding B.V.
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