

# ANOTHER STAR PRIVACY POLICY

28 October 2025

## 1. Introduction

This Privacy Policy ("Policy") explains how AS Operations Holding B.V. ("Another Star", "we", "our" or "us") processes personal information of guests, bookers and other customers ("Guests") who stay at the citizenM hotels we operate. It also applies to visitors of our websites ("Visitors"). This Policy supplements Marriott's global privacy statement.

Another Star takes the privacy of its Guests and Visitors very seriously and treats their personal information with great care. Another Star acts in accordance with applicable data protection legislation. Your personal information is processed by or on behalf of:

- AS Operations Holding B.V., a limited liability company registered under the laws of the Netherlands, having its statutory seat in Amsterdam, the Netherlands and its offices at Leidseweg 219, 2253 AE Voorschoten, the Netherlands. AS Operations Holding B.V. is registered with the Dutch Chamber of Commerce under registration number 34218994; and,
- in the context of your stay or booking regarding one of our hotels, the entities operating the relevant citizenM branded hotel, whether owned or licensed by AS Operations Holding B.V. and its wholly and partially owned affiliates (each hereinafter referred to as a "citizenM hotel").

In the context of our hotel services and related products and services, AS Operations Holding B.V. is the data controller and the point of contact for all your questions regarding the processing of your personal information.

Another Star operates and manages citizenM branded hotels under a franchise agreement with and/or license from the Marriott Group ("Marriott"). The way Marriott processes personal data is explained in its [Global Privacy Statement](#). This Policy supplements Marriott's Global Privacy Statement.

## 2. Information We Collect and Process

Another Star collects the personal information of its Guests and Visitors for specified, explicit purposes only and will not process this personal information in a manner that is incompatible with those purposes. In some instances, we must collect your personal information in order to enter into an agreement for services with you as a Guest.

We process (e.g. collect, use, disclose, store) the personal information of our Guests and Visitors for the purposes of operations management, analytics, security management and legal and regulatory compliance, as defined below:

- Operations management includes the normal business practices related to our day-to-day business activities including facilitating Guests' stays, guest support and guest identification, enhancing the guest experience based on amongst other things the Guests' known preferences,

locker management, payment, planning and budgeting, financial reporting, resource management (e.g. assignment of meeting rooms, IT appliances,, audits or the establishment, exercising or defending against legal claims.

- Analytics includes the processing of your personal information in anonymous, aggregated form for analytical purposes to improve our business operations, and enhance your experience in our hotels, to predict and anticipate future guest behavior, to develop statistics and commercial scores and to understand guest preferences. We may analyse the information we collect about you, for instance by dividing customers into different customer categories based on purchase patterns, behavior and interactions with us.
- Legal and regulatory compliance includes the processing of any information that citizenM is required to retain based on a legal obligation or duty of care including administrative obligations based on applicable (tax) laws, governmental statistics requirements, etc.
- Security management includes securing the company IT network and systems, company information, company premises, and our employees, Guests and Visitors and preventing fraud and non-payments and other illegal or infringing activities. Guests who have behaved inappropriately during their stay (e.g. aggressive and anti-social behavior, non-compliance with safety regulations, theft, damage and vandalism or payment incidents) may be added to our no-stay list and we may refuse their reservation if they return to our hotels.

Personal information will be processed only if such processing is based on any of the legal grounds listed in section 6(1) of the **General Data Protection Regulation (“GDPR”)**, notably necessary for the performance of a contract, legitimate interest, or compliance with legal obligations.

See Annex I for a detailed overview of the categories of personal information collected, the special personal information collected, the legal grounds for collection and the source of personal information collected.

**Notice of Financial Incentive:** Guests and Visitors may join the mycitizenM+ subscription programme at any time by registering on the mycitizenM+ website. By subscribing (becoming a member), subscribers receive discounts, perks and other benefits available exclusively to members. Because the programme involves the collection of personal information, it might be interpreted as a “financial incentive” program under California law. We collect identifying personal information from subscribers (such as name, address, email address, country of residence, tokenized credit card information and account password). The value of this personal information to us is related to the value of the free or discounted products or services, or other benefits that subscribers receive through the programme, less the expense related to offering those products, services, and benefits to subscribers, including any subscription fees. Subscribers may cancel their memberships at any time by sending an email to the email address specified by us from time to time on the mycitizenM+ website or otherwise communicated to you.

### **3. Sharing Your Information**

We may share your personal information in a limited number of circumstances, including:

- **Marriott:** If you are a participant of the mycitizenM+ programme, we may share personal information with Marriott. Marriott owns and controls the mycitizenM+ programme, which we administer on their behalf. Please refer to the [Marriott Group Global Privacy Statement](#) for more information about how Marriott collects, uses and discloses Personal and Other Data (as defined in its Global Privacy Statement).
- **Third-Party Service Providers:** We share personal information with third parties involved in the process of providing services to us or you or performing functions on our behalf (including payment processing). Those third parties are only permitted to use your personal information for the purpose for which it has been provided and may not disclose it to any other third party except at our express direction and in accordance with this Policy.
- **Legal & Regulatory Authorities:** We may from time to time make your personal information available to legal and regulatory authorities, to our accountants, auditors, lawyers or similar professional advisers or to other third parties, when this is required by law, necessary to permit us to exercise our legal rights, to comply with our legal obligations, or necessary to take action regarding illegal activities or to protect the safety of any person.
- **Business Transitions:** If all or part of our company is sold, merged or otherwise transferred, we may share and transfer your personal information in connection with that transaction. We may also transfer your personal information to the owners of hotels managed by us.

We will not sell your personal information to third parties, however, under some laws, including the California Consumer Privacy Act, the terms “sell” or “sale” are broadly defined to include the sharing of personal information with third parties through tracking technologies on our website. Where required by law, we provide consumers with the right to opt out of the sale or sharing of their personal information. For more information about our use of tracking technologies, please see the section of this privacy statement titled “Our Cookies Policy.”

## 4. Your Choices & Rights

The following choices and rights with regards to your personal information may be available to you depending on where you live:

### Access Request Rights

You have the right to request that we provide to you the following information about our collection and use of your personal information:

- The (categories of) personal information we have collected about you.
- The categories of sources for the personal information we have collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share or have shared that personal information.
- The specific pieces of personal information we collected about you

- Information regarding any disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

**Deletion, Rectification and Restriction Request Rights**

You have the right to request that we delete, restrict or, if you believe that our processing of your personal information is incorrect or inaccurate, change any of the personal information collected from you and retained, subject to certain exceptions. Once your verifiable consumer request is confirmed, we will delete, restrict or change, as the case may be, and direct our service providers to delete, restrict or change your personal information. Your request to delete the personal information collected may be denied if it is necessary for us to retain your information under one or more of the exceptions listed in the GDPR, California Consumer Privacy Act, or other applicable law.

**Data Portability Rights**

In some cases, you may receive a copy of your personal information in a structured, commonly used and machine-readable format.

**Right to Object**

Where we process your personal information based on a "legitimate interest", you may have the legal right to object to the processing of your personal information, on grounds relating to your particular situation.

**Right to Revoke Consent**

Where we process personal information based on your consent, you have the right to revoke such consent at any given time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**Right to Opt-Out of Sale, Sharing and Targeted Advertising**

Where we are selling or sharing your personal information with third parties for targeted advertising purposes, you may opt-out of such disclosures at any time.

**Post-mortem Right to Privacy**

You have the right to set instructions regarding the storage, deletion or communication of your personal information after your death.

**Right to Appeal**                      You may have a right to appeal our decision if we decline to process your request in part or in full. You can do so by replying directly to our denial.

**Right to Complain**                      You have the legal right to lodge a complaint with the competent authority.

Requests to exercise these rights may be made using the contact information listed below, or as otherwise described in this Policy. When handling any data access, erasure, or correction requests, we will first confirm the identity of the individual making the request or query and consider our obligations under applicable data protection laws and regulations. Such requests are usually provided free of charge; however, a reasonable fee may be applied to cover our administrative costs for requests that are manifestly unfounded, excessive or repetitive. We always aim to provide you with a response as soon as possible and as required under applicable laws. We will not discriminate against you for exercising any of these rights.

You have the right to have an authorized agent submit a request on your behalf. We may require that agents provide verification that they are acting on your behalf.

**Do Not Track:** Our websites are not designed to respond to “do not track” requests from browsers.

**Global Privacy Control:** Where required by law, our websites respond to the [Global Privacy Control](#) (“GPC”) signal and will treat such signals as requests to opt-out of sharing for the purposes of cross-context behavioral advertising or targeted advertising. Note that if you use the GPC, your request to opt-out will apply only to the browser from which you submit the request.

**“Shine the Light” and “Eraser” Laws:** You may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties’ direct marketing purposes.

## **5. Protecting Your Personal Information**

**Security:** Another Star has used and will continue to use reasonable endeavors to protect personal information against loss, alteration or any form of unlawful use. Where possible, personal information will be encrypted and stored on a virtual private server that is secured by means of industry standard protection measures. A strictly limited number of people, i.e. those people that must have access to personal information for the purpose of their job, have access to personal information. If and to the extent personal information will be stored in a cloud infrastructure provided by third party cloud providers, these providers will be bound by written contract to process personal information provided to them only for the purpose of providing the specific service to Another Star and to maintain appropriate security measures to protect this personal information. Another Star strives to make limited use of paper files which contain personal information. If the use of paper files cannot be avoided such paper files are stored in a closed cabinet and are destroyed in accordance with the applicable retention terms.

**Data Breaches:** Another Star will protect the personal information it processes against loss and unlawful processing. If despite such protection a data breach occurs, Another Star will report such data breach to the appropriate regulatory authorities where it leads to a considerable likelihood of serious adverse effects on the protection of personal information, if it has serious adverse effects on the protection of personal information, or if otherwise advisable or required by law. The data breach will also be reported to the affected individuals if it is likely to adversely affect their privacy or if otherwise required by law. In order to ensure that a data breach will receive adequate attention and, if required, be reported, we have implemented a Data Breach Policy, which describes the procedure that must be followed in case of a data breach.

**Data Processing Register:** Another Star will record the details of each data process in a data processing register. New data processes will undergo a data protection impact assessment (“DPIA”) prior to their implementation if such data process is likely to result in a high risk of harm to the rights and freedoms of our Guests and Visitors. This DPIA process helps us determine if appropriate measures are taken to safeguard the personal information of our Guests and Visitors.

**Data Retention:** Another Star will retain personal information only for the period necessary to fulfill the purposes for which it has been collected, i.e. 3 years from the later of the Guest’s stay, , unless a longer retention period is required (e.g. to respond to incident information requests during the statutory claim period) or permitted by law (which is typically the case in the context of Another Star’s obligations under tax law). During this period you may request to have your details removed from our files by sending an e-mail to [privacy@anotherstar.com](mailto:privacy@anotherstar.com).

**Cross-Border Data Transfers:** As we operate internationally and provide you with relevant services through resources and servers around the globe, sharing your personal information across borders is essential for you to receive our services. You therefore acknowledge and agree that Another Star may transfer your data globally, so that you can use our services. Your personal information may be transferred to a citizenM hotel or our (support) partners in a country outside of the country where it was originally collected or outside of your country of residence or nationality. For technical and organizational reasons and in the context of our digital cloud infrastructure, personal information is also transferred to servers located in the U.S.A. or to servers located in other countries outside of the European Economic Area. In this regard, we have followed due diligence and entered into contractual agreements as required by applicable data protection laws, including where appropriate EU or UK model clauses, with the receiving parties. Our contracts impose obligations on the receiving parties to ensure appropriate technical and organizational measures are implemented and maintained at all times to prevent the unauthorized and unlawful processing of personal information, and the accidental loss or destruction of, or damage to, personal information, consistent with our obligations under applicable data protection laws. Please contact us if you wish to receive more information on the specific safeguards we have implemented to ensure an adequate level of data protection regarding such transfers.

## **6. Children**

Our websites are not directed to minors. Another Star does not knowingly solicit, collect, use or disclose personal information from children under 18 years of age. If we become aware that we have unknowingly collected personal information from a child under the age of 18, we will delete such information from our records.

## 7. Our Cookies Policy

Another Star uses cookies, pixels, and other tracking technologies (hereinafter simply referred to as “cookies”) for website functionality, to enhance users’ experience, to market to you, and for other purposes. Specifically, when you visit our website, we may deploy the following types of cookies:

**Website Functionality and Optimization Cookies:** We use cookies that are necessary to provide the requested service. For instance, technical cookies allow you to proceed through different pages of a website with a single login and they remember selections in shopping carts and (order) forms that are filled out on our websites. We also use cookies to measure your behavior on our websites to learn about the online experience of our websites visitors and to improve our websites. In doing so, we also collect the technical features of your terminal equipment and software used by you, such as the type of operating system, the browser settings, the installed plug-ins, the time zone and the screen size of your device.

**Marketing Cookies:** Marketing cookies and trackers on your device help us advertise our products and services to you. The marketing cookies also enable us to provide you with relevant offers based on your online browsing, search and booking behaviour.

**Cross-Site Tracking:** Third parties can store tracking cookies on your device if you visit our websites. Such cookies enable these third parties to track your online browsing behaviour across different websites (including the Another Star websites). A common purpose of such tracking cookies is to provide you with targeted advertisements across the websites you visit. We do not control or influence the use by third parties of the information collected through these third-party cookies. Please read the privacy policies of these third parties to find out more about how they use cookies and process your personal information. Please note that we use Google Analytics and you can opt-out of Google Analytics by downloading [Google's Opt-Out Browser Add-on](#).

**Social Media:** With your consent, our website uses cookies to interact with social media platforms. These cookies are also used to optimize your experience of the social media websites. Please be aware that these cookies may also allow social media platforms to track your online behaviour for cross-site tracking purposes.

**Cookies Choices:** In applicable jurisdictions, Marketing, Cross-Site Tracking, and Social Media cookies will only be deployed if you consent by clicking “accept cookies” when you visit our site. You can always withdraw your consent by removing cookies from your browser or by clicking the “Do Not Sell or Share My Personal Information” link or “Cookie Preferences” link at the bottom of our webpage.

## 8. Monitoring & Audit

Compliance with this Policy will be monitored regularly. The data processing register will be updated promptly upon the implementation of a new data process. The completeness and accurateness of the data processing register will be verified regularly.

## **9. Revisions to this Privacy Policy**

We have done our best to make sure that this Policy explains the way in which we process your personal information and rights you have in relation thereto. However, we may change this Policy from time to time to make sure it is still up to date. When necessary, we will alert you to material changes by posting a prominent notice on our websites.

## **10. Contact Information/How to Exercise Your Privacy Rights and Choices**

If you have any questions or comments about this Policy or would like to exercise any of your rights as outlined in this Policy, please email us at [privacy@anotherstar.com](mailto:privacy@anotherstar.com). You may also click [here](#) to use our online form. Our Data Protection Officer can be contacted at [dpo@anotherstar.com](mailto:dpo@anotherstar.com).

If, as an EEA resident, you believe that we have not adequately resolved any such issues, you have the right to contact your EU supervisory authority.

In the Netherlands:

Autoriteit Persoonsgegevens

P.O. Box 93374

2509 AJ the Hague, the Netherlands

## Annex I: Overview of personal information collected

Depending on whether you are a Guest or Visitor of our websites, Another Star may capture the following information about you:

Category of Personal Information Collected	Specific Personal Information Collected	Sources of Personal Information	Purpose for Collection	Legal Grounds for Collection	Categories of Third Parties to Whom Sold or Shared for cross context behavioural advertising
Identifiers	Name; mailing address; billing address; email address; telephone number; payment information (including tokenized credit card details); IP address; vehicle details; social media handles and social media details; any other personal information you provide when making your booking, soliciting customer service, or providing customer feedback	Reservation systems, Wi-Fi registration, account creation, communications with us, check-in/check-out	Operations Management Analytics Legal & Regulatory Compliance Security Management	Necessary for performance of contract Consent Legitimate interest Compliance with legal obligation	Analytics and advertising partners

<b>Protected Characteristics</b>	Gender, nationality, disability data (in case you book a room adapted for disabled guests or requested admittance of a service animal), date of birth	Information you provide to use upon reservation or check-in	Operations Management Legal & Regulatory Compliance	Legitimate interest Compliance with legal obligation	None
<b>Commercial Information</b>	Booking details, records of personal property (products) and food & beverage and hotel services purchased, including reservation information and your “favourites”	Purchases made at our hotels, online, or via our mobile application or via third-party websites	Operations Management Analytics	Legitimate interest	Analytics and advertising partners
<b>Internet or Other Similar Network Activity</b>	IP address, information on the use of the room systems (such as lights, blinds, media, climate control and door locks) and other systems (e.g. kiosk use), online behavior on our website or mobile application	Website, cookies, tracking technologies, mobile application, social media, chatbots, room systems, obtained from social media platforms such as LinkedIn and Facebook or data brokers	Operations Management Analytics Security Management	Necessary for performance of contract Legitimate interest	Analytics and advertising partners

<b>(Geo)location Data</b>	Location	Website, mobile app, device, CCTV surveillance systems	Operations Management Security Management	Legitimate interest	Analytics and advertising partners
<b>Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information</b>	Recorded telephone conversation, transcript of conversation; video recording; use of the room systems (such as lights, blinds, media, climate control and door locks)	Telephone conversations; CCTV surveillance systems; room control systems	Operations Management Analytics Security Management	Legitimate interest	None
<b>Inferences drawn from other personal information</b>	Profile reflecting your characteristics, psychological trends, predispositions, behaviors	Information we collect about you from our interactions with you	Operations Management Analytics Security Management	Legitimate interest	Analytics and advertising partners
<b>Sensitive Personal Information</b>	Visa information, tax identification number, details from your ID (such as passport, state identification card or driver's license), including type of document, ID	Reservation systems, Wi-Fi registration, account creation, communications with us, check-in/check-out, mobile application	Operations Management Security Management	Necessary for performance of contract Legitimate interest Compliance with legal obligation	None

	<p>number, place and date of issuance and expiry date; account username and password</p> <p>Another Star does not use sensitive personal information for the purpose of inferring characteristics about a consumer</p>				
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