

CCTV Policy

1. Purpose

Another Star 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

The fulfillment of any request to provide a copy of CCTV footage is contingent upon maintaining the privacy rights of third parties visible in the recording. We will first assess

the technical and practical feasibility of editing the requested footage to adequately blur or mask the identity of all third-party individuals (including assessment of time, cost, and technical resources). Only if adequate blurring is deemed feasible we will proceed to edit the footage and provide an external copy of the finalized, blurred recording to the requestor. If the required blurring or masking is not technically or commercially feasible, the request to provide an external copy of the footage will be declined. In such cases, the requestor will be offered the opportunity to view the unedited footage on our premises under strictly controlled conditions and in the presence of an Another Star representative. No external recording or copying of the footage during the viewing session is permitted.

Disclosure to law enforcement authorities will only occur upon presentation of a subpoena or equivalent documentation, or as mandated by a court order..

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@anotherstar.com or submit a written request to AS Operations Holding B.V., attn. Legal Department, Leidseweg 219, 2253 AE Voorschoten, the Netherlands. Our Data Protection Officer can be reached at dpo@anotherstar.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.

Another Star'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.

AS Operations Holding B.V.
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