

## Hostelworld Group PLC

### Data Protection Notice for Shareholders

This Privacy Notice is issued by Hostelworld Group PLC of High Holborn House, 52 - 54 High Holborn, London, WC1V 6RL (the “Company”, “we”, “us”, “our”). The purpose of this notice is to inform you of the data relating to you that we may collect and use and the uses (including disclosures to third parties) we may make of such data.

#### Personal Data that we Collect and Process

We may collect and process data relating to you during the course of our relationship with you. Such data may include:

- your name and contact details, including your address, phone number and email address;
- your date of birth;
- your nationality;
- your bank account details, including your account number and sort code;
- your tax details;
- a statement of the shares held by you in the Company and the amount paid on the shares;
- details regarding dividend, interest or any other moneys paid to you where relevant;
- the date on which you were entered onto the Company’s register of members;
- the date on which you cease to be a shareholder in the Company;
- your IP address; and
- any other personal information you have provided directly to us.

#### Purposes of Processing and Legal Basis

We, and third party service providers acting on our behalf, will use personal data relating to you for the purposes of:

- maintaining and administering the Company’s register of members;
- filing annual returns and associated financial statements with Companies House;
- maintaining and administering a register of beneficial ownership;
- analysing beneficial and legal shareholdings for tax and jurisdictional purposes and/or to facilitate shareholder consultations or proxy solicitations;
- maintaining records of member meetings, votes and resolutions and providing voting and proxy services;
- offering shareholder and investor services;

- contacting you in order to give you notice of Company meetings and to provide you with Company documents;
- contacting you to arrange meetings with you or invite you to attend investor conferences;
- soliciting voting proxies in relation to resolutions being put to members at a Company meeting;
- engaging in consultations with shareholders on Company issues;
- determining whether you would like to participate in certain equity offerings such as private placements, rights offerings, etc.;
- processing shareholder requests in relation to change of address, change of mandate and/or merging shareholdings;
- dealing with notifications of the death of a shareholder;
- paying you a dividend, interest or any other moneys payable where relevant;
- processing the purchase or sale of shares in the Company and registering transfers of shares;
- any reorganisation of the share capital of the Company which affects your rights as a shareholder;
- anti-money laundering, fraud prevention, investigation and detection;
- complying with market abuse law and regulation applicable to the Company including pursuant to the Market Abuse Regulation;
- facilitating or implementing a business re-organisation or a transfer/sale of all or part of our assets or business of the Company or a general investment;
- dealing with routine correspondence with the Irish Stock Exchange, the London Stock Exchange, Euroclear, and Companies House and handling shareholders' or their agent's enquiries via telephone, letter or email;
- establishing, exercising or defending legal claims; or
- complying with any obligations imposed on the Company by applicable law.

The legal bases on which we collect, process and transfer your personal data are:

- that this is necessary for compliance with a legal obligation that applies to us;
- that this is necessary for the performance of our contract with you through the constitution of the Company;
- that this is necessary for the purposes of our legitimate interests or the legitimate interests of a third party to whom we provide your personal data. We will not process your personal data for these purposes if our or the third party's legitimate interests should be overridden by your

own interests, rights and freedoms. The legitimate interests for which we process your personal data include our legitimate interests in:

- conducting our business in a responsible and commercially prudent manner;
- preventing, investigating or detecting theft, fraud or other criminal activity; and
- pursuing our corporate and social responsibility objectives.

### **Recipients of Data**

We may disclose your personal data to third party recipients in connection with the above purposes, including:

- to third parties who we engage to provide services to us, such as professional advisers, auditors and outsourced service providers;
- to our investment manager, its affiliates and their respective service providers from time to time;
- to our share registrar and its service providers;
- to our depositary and custodian and its service providers;
- to our sponsor, broker and financial advisors;
- to other members of our corporate group;
- to financial intermediaries and lenders;
- to business partners and/or possible acquirers of the Company or investors (and our and/or their advisors); or
- to competent regulatory authorities and bodies as requested or required by law.

### **Retention**

We will retain your personal data for the duration of your shareholding in the Company and for such a period of time after you cease to be a shareholder in the Company as is necessary to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise in connection with your shareholding.

### **Transfers Abroad**

In connection with the above we may transfer your personal data outside the European Economic Area, including to a jurisdiction which is not recognised by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law regarding such transfers, which may include entering into a contract governing the transfer which contains the 'standard contractual clauses' approved for this purpose by the European Commission or, in respect of transfers to the United States of America, ensuring that the

transfer is covered by the EU-US Privacy Shield framework. Further details of the measures taken may be requested by contacting us at [DataProtectionOfficer@hostelworld.co](mailto:DataProtectionOfficer@hostelworld.co).

### **Requirement to Provide Data**

You are not under a statutory or contractual obligation to provide us with any personal data.

### **Your rights**

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- the right to access your personal data;
- the right to request the rectification and/or erasure of your personal data;
- the right to restrict the use of your personal data;
- the right to object to the processing of your personal data;
- where we are processing personal data based on this being necessary for the performance of a contract with you, the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller;

In order to exercise any of the rights set out above, you can contact us at [Dataprotectionofficer@hostelworld.com](mailto:Dataprotectionofficer@hostelworld.com).

### **Complaints**

If you are not happy with the way we have used your information or addressed your rights, you have the right to make a complaint to the Information Commissioner's Office by calling 0303 123 1113 or contacting it via its website at <https://ico.org.uk/concerns/>.