



1. THE AIRELLE COLLECTON GROUP'S COMMITMENT TO PROTECTING PRIVACY

Because we consider you an important customer, our first priority is to offer you exceptional times.

Your complete satisfaction and confidence in Airelles Collection are absolutely essential to us.

That's why, as part of our commitment to meeting your expectations, we have set up a **customer privacy protection policy**. This Charter formalizes our commitments to you and describes how Airelles Collection uses your personal data.

The main rules applicable within the Airelles Collection (and its subsidiaries) are founded on **seven principles**.

2. CONSENT

"Personal data" means any information collected and logged in a format that allows you to be identified personally, either directly (e.g. name) or indirectly (e.g. telephone number) as a natural person. Before providing us with this information, we recommend that you read this document describing our customer privacy protection policy.

This Personal Data Protection Charter forms part of the terms and conditions that govern our hotel services. By accepting these terms and conditions, you expressly accept the provisions of this Charter.



3. AIRELLE COLLECTON'S SEVEN PRINCIPLES FOR PROTECTING YOUR PERSONAL DATA

The seven principles below are applicable within the Airelles Collection.

1. **Transparency:** When collecting and processing your personal data, we will communicate all information to you and inform you of the purpose and recipients of the data.
2. **Legitimacy:** We will collect and process your personal data only for the purposes described in this Charter.
3. **Relevance and accuracy:** We will only collect personal data that is necessary for data processing. We will take all reasonable steps to ensure that the personal data we hold is accurate and up to date.
4. **Storage:** We will hold your personal data for the period necessary for processing the same in compliance with the provisions of the law.
5. **Access, rectification, opposition:** You may access, modify, correct or delete your personal data. You may also oppose the use of your personal data, particularly to avoid receiving sales and marketing information.
6. **Confidentiality and security:** We will ensure reasonable technical and organizational measures are in place to protect your personal data against alteration or accidental or unlawful loss, or unauthorized use, disclosure or access.
7. **Sharing and international transfer:** We may share your personal data within the Airelles Collection or with third parties (such as commercial partners and/or service providers) for the purposes set out in this Charter. We will take appropriate measures to guarantee security when sharing or transferring such data.

4. SCOPE OF APPLICATION

This Charter applies:

1. To all data processing implemented in our subsidiary and managed hotels, i.e. those operating under an Airelles Collection brand.
2. To all Airelles Collection reservation websites.

5. WHAT PERSONAL DATA IS COLLECTED?

At various times, we will be obliged to ask you, as an Airelles Collection customer, for information about you and/or members of your family, such as:

- Contact details (for example, last name, first name, telephone number, email)
- Personal information (for example, date of birth, nationality)
- Information relating to your children (for example, first name, date of birth, age)
- Your credit card number (for transaction and reservation purposes)
- Your arrival and departure dates
- Your preferences and interests (for example, smoking or non-smoking room, preferred floor, type of bedding, type of newspapers/magazines, sports, cultural interests)
- Your questions/comments, during or following a stay in one of our establishments.

The information collected in relation to persons under 18 years of age is limited to their name, nationality and date of birth, which can only be supplied to us by an adult. We would be grateful if you could ensure that your children do not send us any personal data without your consent (particularly via the Internet).

We do not deliberately collect sensitive information, such as information concerning race, ethnicity, political opinions, religious and philosophical beliefs, union membership, or details of health or sexual orientation.

Moreover, depending on applicable local laws, other information could be considered sensitive, such as your credit card number, your leisure activities, personal activities and hobbies, and whether or not you are a smoker. We may be obliged to collect such information in order to meet your requirements or provide you with an appropriate service, such as a specific diet.

In this case, depending on the laws in force in certain countries, your prior consent may be required with regard to the collection of sensitive information.

6. WHEN IS YOUR PERSONAL DATA COLLECTED?

Personal data may be collected on a variety of occasions, including:

1. Hotel activities:

- Booking a room
- Checking-in and paying
- Eating/drinking at the hotel bar or restaurant during a stay
- Requests, complaints and/or disputes.

2. Participation in marketing programs or events:

- Signing up for loyalty programs
- Participation in customer surveys (for example, the Guest Satisfaction Survey)
- Online games or competitions
- Subscription to newsletters, in order to receive offers and promotions via email.

3. Transmission of information from third parties:

- Tour operators, travel agencies, GDS reservation systems, and others

4. Internet activities:

- Connection to Airelles Collection websites (IP address, cookies)
- Online forms (online reservation, questionnaires, Airelles Collection pages on social networks, network login devices such as Facebook login etc.).

7. FOR WHAT PURPOSES?

We collect your personal data for the purposes of:

1. Meeting our obligations to our customers.
2. Managing the reservation of rooms and accommodation requests:
 - Creation and storage of legal documents in compliance with accounting standards.
3. Managing your stay at the hotel:
 - Monitoring your use of services (telephone, bar, pay TV etc.)
 - Managing access to rooms
 - Internal management of lists of customers having behaved inappropriately during their stay at the hotel (aggressive and anti-social behavior, non-compliance with the hotel contract, non-compliance with safety regulations, theft, damage and vandalism, or payment incidents).
4. Improving our hotel service, especially:
 - Processing your personal data in our customer marketing program in order to carry out marketing operations, promote brands and gain a better understanding of your requirements and wishes
 - Adapting our products and services to better meet your requirements

- Customizing commercial offers and the promotional messages we send to you
 - Informing you of special offers and any new services created by Airelles Collection or one of its subsidiaries.
5. Managing our relationship with customers before, during and after your stay:
- Managing the loyalty program
 - Providing details for the customer database
 - Segmentation operations based on reservation history and customer travel preferences with a view to sending targeted communications
 - Predicting and anticipating future behaviors
 - Developing statistics and commercial scores, and carrying out reporting

 - Providing context data for the offer push tool when a customer visits a Group website or makes a reservation
 - Knowing and managing the preferences of new or repeat customers
 - Sending you newsletters, promotions and tourist, hotel or service offers, or offers from Airelles Collection partners, or contacting you by telephone
 - Managing requests to unsubscribe from newsletters, promotions, tourist offers and satisfaction surveys
 - Taking into account the right to object
 - Using a dedicated telephone service to search for persons staying in Airelles Collection hotels in the event of serious events affecting the hotel in question (natural disasters, terrorist attacks etc.).
6. Use a trusted third party to cross-check, analyze and apply certain devices to your collected data at the time of booking or at the time of your stay, in order to determine your interests and your customer profile, and to allow us to send you personalized offers.

7. Improving Airelles Collection services, especially:

- Carrying out surveys and analyses of questionnaires and customer comments
- Managing claims/complaints
- Offering you the benefits of our loyalty program.

8. Securing and enhancing your use of Airelles Collection websites, especially:

- Improving navigation
- Implementing security and fraud prevention.

9. Conforming to local legislation (for example, storing of accounting documents).

8. CONDITIONS OF THIRD-PARTY ACCESS TO YOUR PERSONAL DATA

We endeavor to provide you with the same services in all our establishments . Thus, to guarantee you the right of access and amendment , we have to share your personal data with internal and external recipients subject to the following conditions:

a. Within the Airelles Collection , in order to offer you the best service, we can share your personal data and give access to authorized personnel from the Group, including:

- Hotel staff
- Reservation staff using Airelles Collection reservation tools
- IT departments
- Commercial partners and marketing services
- Medical services if applicable
- Legal services if applicable
- Generally, any appropriate person within Airelles Collection entities for certain specific categories of personal data.



b. With service providers and partners: your personal data may be sent to a third party for the purposes of supplying you with services and improving your stay, for example:

1. External service providers: IT sub-contractors, international call centers, banks, credit card issuers, external lawyers, dispatchers, printers.
2. Commercial partners: Airelles Collection may, unless you specify otherwise to our services, enhance your profile by sharing certain personal information with its preferred commercial partners. In this case, a trusted third party may cross-check, analyze and apply certain devices to your data. This data processing will allow Airelles Collection and its privileged contractual partners to determine your interests and your customer profile, and will allow us to send you personalized offers.
3. Social networking sites: In order to allow you to be identified on the website without the need to fill out a registration form, Airelles Collection has put the Facebook login system in place. If you log in using the Facebook login system, you explicitly authorize Airelles Collection to access and store the public data on your Facebook account, as well as the other data mentioned during use of the Facebook login system. Airelles Collection may also communicate your email address to Facebook in order to identify whether you are already a Facebook user, in order to post personalized and relevant ads on your Facebook account if appropriate.

c. Local authorities: We may also be obliged to send your information to local authorities if this is required by law or as part of an inquiry and in Airelles Collection in accordance with local regulations.

9. PROTECTION OF YOUR PERSONAL DATA DURING INTERNATIONAL TRANSFERS

For the purposes set out in Clause 7 of this Charter, we may transfer your personal data to internal or external recipients who may be in countries offering different levels of personal data protection.

Consequently, in addition to implementation of this Charter, Airelles Collection employs appropriate measures to ensure secure transfer of your personal data to an Airelles Collection entity or to an external recipient located in a country offering a different level of privacy from that proposed in the country where the personal data is collected.

10. DATA SECURITY

Airelles Collection takes appropriate technical and organizational measures, in Airelles Collectiondance with applicable legal provisions, to protect your personal data against illicit or accidental destruction, accidental alteration or loss, and unauthorized access or disclosure. To this end, we have taken technical measures (such as firewalls) and organizational measures (such as a user ID/password system, means of physical protection etc.).

When you submit credit card data when making a reservation, SSL (Secure Socket Layer) encryption technology is used to guarantee a secure transaction.

11. STORAGE OF DATA

We retain your personal data only for the period necessary for the purposes set out in this Charter or in Airelles Collectiondance with the provisions of applicable law.



12. ACCESS AND MODIFICATION

You have the right to access your personal data collected by Airelles Collection and to modify it subject to applicable legal provisions.

You may also exercise your right to object by writing to the address below.

Airelles Collection 17 rue Sommeiller 74000 – Annecy, France

In the event of difficulty exercising your rights, please contact our services for the AIRELLE COLLECTON Group directly by sending an email to info@airellescollection.com or by writing to the address below:

Airelles Collection

17 rue Sommeiller

74000 – Annecy, France

For the purposes of confidentiality and personal data protection, we will need to identify you in order to respond to your request. You will be asked to include a copy of an official piece of identification, such as a driver's license or passport, along with your request.

If your personal data is inaccurate, incomplete or not up to date, please send the appropriate amendments to our services as indicated above.

All requests will receive a response as swiftly as possible and in accordance with applicable law.

You may also exercise your rights in respect of your personal data that is stored and processed by a hotel following a stay. To do this, you must contact the hotel directly.



13. UPDATES

We may modify this Charter from time to time. Consequently, we recommend that you consult it regularly, particularly when making a reservation at one of our hotels.

14. QUESTIONS AND CONTACTS

For any questions concerning the Airelles Collection personal data protection policy, please contact our services).