

CHARTER FOR THE PROTECTION OF PERSONAL DATA OF CUSTOMERS

- Lavorel Hotels Group: our commitment to the protection of privacy
- 2. Consent
- 3. 7 Lavorel Hotels principles concerning the protection of your personal data
- 4. Scope of application
- 5. What personal data is collected?
- 6. When is your personal data collected?
- 7. What are the purposes?
- 8. Conditions of access by third parties to your personal data
- 9. Protection of your personal data during international transfers
- 10. Data Security
- 11. Cookies and Other Tracers
- 12. Data retention
- 13. Access and modification
- 14. Updating
- 15. Questions and contacts

1. LAVOREL HOTELS GROUP: OUR COMMITMENT TO PRIVACY

Protecting our customers is essential to us and we make it our priority to provide you with complete confidence and satisfaction.

As part of our commitment to meet your expectations, we have implemented a privacy policy. This Charter represents our commitments and describes, in all transparency, the methods by which Lavorel Hotels uses your personal data.

The "7 principles" resulting from the recommendations of the CNIL, constitute the main rules applicable in the Lavorel Hotels group (Lavorel Hotels and its hotels and restaurants).

2. CONSENT

Information that is collected and stored in a format that directly (e.g., name) or indirectly (e.g., phone number) identifies you as a natural person is referred to as "personal information". We encourage you to read the rest of this document describing our customer privacy policy before you provide us with this information.

Our terms and conditions, which govern our hotel and restaurant services, incorporate this Privacy Policy. By accepting our terms and conditions, you expressly agree to the provisions of this Privacy Policy.

3. 7 LAVOREL HOTELS PRINCIPLES CONCERNING THE PROTECTION OF YOUR PERSONAL DATA

The 7 principles explained below are implemented for all Lavorel Hotels Group entities.

1. **Transparency:** we will provide you with all information and inform you of the purpose and recipients of your personal data when collecting and processing it.
2. **Legitimacy:** we will collect and process your personal data only for the purposes set out in this Policy.
3. **Relevance and Accuracy:** Only the personal data necessary for the processing of the data will be collected. We will take all reasonable steps to ensure that the personal data we maintain is accurate and up-to-date.
4. **Storage:** Your personal data will be stored for the period necessary for the purposes of processing in accordance with the requirements of the law.
5. **Access, rectification, objection:** You may access, modify, correct or delete your personal data. The contact details of the department to be contacted are given below (§13) in the article "Access and Modification".
6. **Confidentiality and security:** we will implement reasonable technical and organizational measures to protect your personal data against accidental or unlawful alteration or loss, or unauthorized use, disclosure or access.
7. **Sharing and International Transfers:** We may share your personal data within the Lavorel Hotels group or with third parties (such as business partners and/or service providers) for the purposes set out in this Policy. We will take appropriate measures to ensure the security of the sharing and transfer.

4. FIELD OF APPLICATION

This Charter applies to:

1. To all data processing carried out in the establishments of the Lavorel Hotels group (Lavorel Hotels, Château de Bagnols, Suites de la Potinière, Zucca, Barum, Les Bateaux Lyonnais, Auberge de Létraz, Palace de Menthon, Le Chabichou, Grand Hôtel de Courchevel, Grand Hôtel de la Route de Senlis, Kopster Hotels, Château des Ravatys)
2. To all Lavorel Hotels reservation websites, including www.chateaudebagnols.com; www.suites-potiniere.com , www.lesbateauxlyonnais.com , www.letraz.fr, www.lesbateauxlyonnais.com , www.blackbasshotel-annecy.com , www.palacedementhon.com , www.chabichou-courchevel.com , www.legrandhotelcourchevel.com , www.kopsterhotel.com , www.chateaudesravatys.com , www.marriott.fr/hotel/lyon , www.zucca.fr

5. WHAT PERSONAL DATA IS COLLECTED?

As a customer of Lavorel Hotels, we may ask you at various times for information about yourself and/or members of your family, such as

- contact information (e.g. name, first name, phone number, email, ...);
- personal information (e.g. date of birth, nationality, ...);
- information about your children (e.g. first name, date of birth, age...);
- your credit card number, (for transaction and reservation purposes);
- your membership number for a partner program (e.g. airline);
- your arrival and departure dates;

- your preferences and interests (e.g. smoking or non-smoking room, preferred floor, type of bedding, type of newspapers read, sports, cultural interests,...);
- your questions/comments, during or after a stay in one of our establishments.

For persons under 18 years of age, only an adult can provide us with personal data which is limited to their name, nationality and date of birth. Please ensure that your children do not transmit any personal data to us without your permission (including via the Internet). If such transmission should occur, you may contact the Marketing Department (see "Access and Modification") to have this information deleted.

We have chosen not to collect sensitive information, such as racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, health details or sexual orientation.

In addition, depending on applicable local laws, other information may be considered sensitive, including: your credit card number, your hobbies, your personal activities and interests, whether you smoke or not, etc. We may need to collect this information in order to fulfill your requests or provide you with the 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 for the collection of sensitive information.

6. WHEN IS YOUR PERSONAL DATA COLLECTED?

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

1. Hotel activities:

- Room Reservation;
- Check-in and check-out;
- Consumption at the bar or restaurant during a stay;
- Requests, complaints and/or disputes.

2. Cruise Activities:

- Reservation of a cruise;
- Registration and payment;
- Consumption at the bar or restaurant during a cruise;
- Requests, complaints and/or disputes.

3. Participation in marketing programs or events:

- Contribution to satisfaction surveys (e.g., Guest Satisfaction Survey);
- Online contests or games;
- Subscription to newsletters, in order to receive offers and promotions by email.

4. Transmission of information from third parties:

- Tour operators, Travel agencies, GDS reservation systems, others, ... ;

5. Internet activities:

- Connection to the Lavorel Hotels group sites (IP address, cookies);

- Online collection forms (online reservations, questionnaires, Lavorel Hotels' pages on social networks, login devices such as Facebook Login...).

- Online sales on www.chateaudesravatys.com

7. WHAT ARE THE PURPOSES?

We collect your personal data in order to:

1. Fulfill our obligations to our customers.
2. To manage room reservations and accommodation requests:
 - Establishing and maintaining legal documents in accordance with accounting standards ;
3. Manage the booking of cruises:
 - Establish and maintain legal documents in accordance with accounting standards
4. Manage your stay at the hotel:
 - Follow-up of your consumptions (telephone, bar, payTV, ...)
 - Management of access to rooms
 - Internal management of the list of clients who have behaved inappropriately during their stay at the hotel (aggression and incivilities, non-compliance with the hotel contract, non-compliance with security rules, theft, damage and vandalism or payment incidents).
5. Improve our hotel, restaurant and cruise services, including:
 - To conduct marketing operations, brand promotion by processing your personal data in our customer marketing operations, in order to have better knowledge of your needs and wishes;
 - Adapt our products and services to better meet your needs;
 - To personalize commercial offers and messages to you;
 - Inform you of special offers and new services created by Lavorel Hotels or one of its establishments;
6. Manage our relationship with our customers before, during and after their stay:
 - Qualification of the customer database;
 - Sending targeted communications based on the reservation history and travel habits of customers;
 - Be able to make forecasts and anticipate future behavior;
 - Establish statistics and business results, and perform reporting;
 - Know and manage the preferences of loyal or not loyal customers;
 - Send you newsletters, promotions and offers for tourism, hotels or services from Lavorel Hotels or contact you by phone;
 - Manage requests to unsubscribe to newsletters, promotions, tourist offers and satisfaction surveys;
 - To take into account the right of opposition;
 - To search by a dedicated telephone service for persons present in the establishments of the Lavorel Hotels group in the event of serious events affecting the site concerned (natural disasters, attacks, etc.);

7. To carry out cross-checking, analysis and combination of your data collected, via a trusted third party, at the time of the reservation or your stay, in order to know your centers of interest, your customer profile and to send you personalized offers.
8. To improve the services of Lavorel Hotels, in particular :
 - By carrying out the study and analysis of questionnaires and customer comments;
 - Managing complaints;
9. To secure and improve your use of the Lavorel Hotels websites, in particular by
 - Improving navigation
 - Implementation of security and fraud prevention
10. To comply with local laws (e.g., retention of accounting records)

8. CONDITIONS OF ACCESS BY THIRD PARTIES TO YOUR PERSONAL DATA

In order to guarantee you a right of access and modification (article "Access and Modification"), we must share your personal data with internal and external recipients, under the following conditions:

1. In Lavorel Hotels group: in order to provide you with the best service, we may share your personal data and give access to authorized personnel of our entities, including:
 - Hotel and restaurant staff;
 - Reservation personnel using the reservation tools;
 - IT departments;
 - Business partners and marketing departments;
 - Medical services, if any;
 - Legal services, if any;
 - Any appropriate person of the Lavorel Hotels group entities for specific categories of personal data.
2. With service providers and partners: your personal data may be transferred to a third party in order to provide you with services and improve your stay, including:
 - External service providers: IT subcontractors, banks, credit card issuers, external lawyers, routers, printers.
3. Business partners: Lavorel will not share information about you with its business partners without your prior and explicit consent. Lavorel Hotels may occasionally offer you to follow the news of some of its privileged partners and will present you with the purpose of the information that will be transmitted to you. In order to guarantee you full control over your personal data, without your explicit consent, the Lavorel Hotels group undertakes not to provide such data to its commercial partners.
4. Local authorities: we may also be required to pass on your information to local authorities, if required by law or in the context of an investigation and in accordance with local regulations.

9. DATA SECURITY

Lavorel Hotels takes appropriate technical and organizational measures, in accordance with applicable legal provisions, to protect your personal data against unlawful or accidental destruction, accidental loss or alteration, or unauthorized disclosure or access. Accordingly, technical measures (such as firewalls) and organizational measures (such as a login/password system, physical safeguards, etc.) have been put in place.

When you transmit your credit card information during your reservation, an SSL (Secure Socket Layer) encryption technology is used to secure your transactions.

10. COOKIES AND OTHER TRACKING DEVICES

Lavorel Hotels uses cookies and other tracking devices on its online reservation sites.

These cookies are necessary to facilitate navigation on our websites and are used to

- manage your authentication on our websites and the associated security, and ensure the proper functioning of the authentication module;
- To make your experience optimal and to facilitate your navigation on our websites;
- to keep in memory the information according to which you saw the banner of information "cookies" and continued your navigation, agreeing thus to the insertion of tracers on your terminal;
- implement security measures (e.g., when you are asked to reconnect to a content or service after a certain period of time, or to ensure the basic functionality of our websites and the use of their main technical features such as performance monitoring, navigation errors, user session management, etc.)
- adapt our websites to your terminal's display preferences (language, currency, display resolution, operating system used, configuration and parameterization of the display of the sites' pages according to the terminal you are using and its location, etc.);
- to memorize certain information that you enter on our Internet sites in order to facilitate and personalize your future navigations (for example, display of your name and first name if you have a user account and you have identified yourself);
- allow you to access your personal areas more quickly by memorizing identifiers or data that you have previously indicated.

Audience tracking cookies are also used to improve your browsing experience by helping us to understand your interactions with our sites (most visited pages, applications used, etc.); these cookies make it possible to produce statistics and, for example, to test different displays in order to improve the interest and ergonomics of our services.

11. RETENTION OF DATA

We keep your personal data only for the period necessary for the purposes set out in this Charter or in accordance with what is provided by the applicable law.

Concerning the retention periods :

- Personal data collected and processed for the provision of our services are kept for the duration of the contractual relationship, and then on an active basis for 5 years from the end of the service. However, the latter may be kept longer if justified by the needs of the operation (in case of ongoing litigation for example). In any case, when necessary, these periods may be extended until the date of the limitation of liability, at which time the personal data will be pseudonymized;
- Your credit card information is not retained beyond the completion of the transaction.
- Contest information is retained for the duration of the contest and the awarding of prizes;

- Personal data related to requests for information, without a contract, are kept for the time necessary to respond, plus a maximum of 6 months;
- Personal data processed in the context of canvassing or communication operations for which you have given your consent will not be kept for more than 3 years from the date of the last contact from you; or they will be deleted as soon as you express your opposition to their use (see the "Access and Modification" section below).

12. ACCESS AND MODIFICATION

Your personal data collected by Lavorel Hotels is accessible to you and can be modified subject to the applicable legal provisions.

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

If you have any difficulty in exercising your rights, please contact the marketing department in charge of personal data for the Lavorel Hotels group directly by e-mail at communication@lavorelhotels.com or by writing to the following address

Lavorel Hotels

Data Protection Department

67 quai Charles de Gaulle

69006 Lyon

In order to ensure the confidentiality and protection of your personal data, we will need to identify you in order to respond to your request. Therefore, you will need to attach a copy of an official identity document, such as a driver's license, identity card or passport, to your request.

If your personal data is not accurate, complete or up to date, please communicate the changes to the Marketing Department indicated above.

All requests will be processed in a timely manner and in accordance with applicable law.

You also have the right to file a complaint with the Commission Nationale Informatique et Libertés (CNIL).

If you wish to submit a request to the CNIL, you will find the contact details below:

- By e-mail to the CNIL (Commission Nationale de l'Informatique et des Libertés) at the following address: 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07 ;
- By phone at +33 (0)1 53 73 22 22 (Monday to Thursday from 9am to 6:30pm / Friday from 9am to 6pm);
- By fax to 01 53 73 22 00.

Please note! The CNIL does not receive the public and does not provide information on site.

If you wish to file a complaint with the CNIL, you can fill out the online complaint form available at the following address: <https://www.cnil.fr/fr/plaintes>

If you have a question about your rights regarding data processing and liberties, you can consult the CNIL website: www.cnil.fr.

13. UPDATING

We may modify this Charter periodically. Therefore, we invite you to consult this Charter regularly, especially when making a reservation in one of our entities.

14. QUESTIONS AND CONTACTS

For any questions concerning the personal data policy within the Lavorel Hotels group, please contact the Marketing Department (see "Access and Modification").