

CUSTOMER DATA PROTECTION CHARTER

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1. LAVOREL HOTELS GROUP: OUR COMMITMENT TO PRIVACY PROTECTION

Protecting our customers is paramount, and we make it our priority to offer you complete confidence and satisfaction.

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

The main rules applicable within the Lavorel Hotels group (Lavorel Hotels and its hotels and restaurants) are based on the '7 principles' recommended by the French Data Protection Authority (CNIL).

2. CONSENT

Information collected and recorded 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, is referred to as 'personal data'. We invite you to read the rest of this document describing our policy on the protection of our customers' privacy before sending us this information.

Our general terms and conditions, which govern our hotel and restaurant services, include 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 have been implemented for all entities of the Lavorel Hotels group.

1. Transparency: we will provide you with all information and inform you of the purpose and recipients of your personal data when it is collected and processed.
2. Legitimacy: we will collect and process your personal data solely for the purposes set out in this Charter.
3. Relevance and accuracy: Only the personal data necessary for data processing will be collected. We will take all reasonable steps to ensure that the personal data we hold is accurate and up to date.
4. Retention: Your personal data will be retained for as long as is necessary for the purposes for which it is to be processed in accordance with the requirements of the law.
5. Access, correction, 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 'Access and Modification' section

6. Confidentiality and security: we will put in place reasonable technical and organisational measures to protect your personal data against accidental or unlawful alteration or loss, or unauthorised 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 Charter. We will take appropriate measures to ensure the security of the sharing and transfer.

4. SCOPE OF APPLICATION

This Charter applies to:

1. All data processing carried out in establishments belonging to 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. All Lavorel Hotels reservation websites, in particular : www.chateaudebagnols.com; www.suites-potiniere.com , www.lesbateauxlyonnais.com , www.palacedementhon.com , www.chabichou-courchevel.com , www.legrandhotelcourchevel.com , www.kopsterhotels.com , www.chateaudesravatys.com , www.marriott.fr/hotel/lyon , www.zucca.fr , www.legrandpavillonchantilly.com

5. WHAT PERSONAL DATA IS COLLECTED?

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

- o contact details (e.g. surname, first name, telephone number, email address, etc.);
- o personal information (e.g. date of birth, nationality, etc.);
- o information about your children (e.g. first name, date of birth, age, etc.);
- o your credit card number (for transaction and reservation purposes);
- o your membership number for a partner programme (e.g. airline);
- o your arrival and departure dates;
- o your preferences and interests (e.g. smoking or non-smoking room, preferred floor, type of bedding, type of newspapers read, sports, cultural interests, etc.);
- o your questions/comments, during or following a stay in one of our establishments.

For people under 18, 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 send us any personal data without your permission (particularly via the Internet). Should such data be transmitted, you can 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 or philosophical beliefs, trade union membership, health details or sexual orientation.

In addition, depending on the applicable local laws, other information could be considered sensitive, in particular: your credit card number, your hobbies, your personal activities and hobbies, whether or not you smoke, etc.... We may need to collect this information in order to satisfy 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 various occasions, in particular:

1. Hotel activities:
 - Booking a room;
 - Check-in and payment;

- Consumption in the bar or restaurant during a stay;
- Requests, complaints and/or disputes.
- 2. Cruise activities :
 - Booking a cruise;
 - Check-in and payment;
 - Consumption in the bar or restaurant during a cruise;
 - Requests, complaints and/or disputes.
- 3. Participation in marketing programmes or events:
 - Contribution to satisfaction surveys (e.g. Guest Satisfaction Survey);
 - Online competitions 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 Lavorel Hotels group sites (IP address, cookies);
 - Online collection forms (online reservations, questionnaires, Lavorel Hotels establishment pages on social networks, connection devices such as Facebook Login, etc.).
 - Online sales at www.chateaudesravatys.com

7. WHAT ARE THE PURPOSES?

We collect your personal data in order to: 1:

1. fulfil our obligations to our customers.
2. To manage the booking of rooms and accommodation requests:
 - o To draw up and keep legal documents in accordance with accounting standards;
3. To manage the booking of cruises:
 - o To draw up and keep legal documents in accordance with accounting standards;
4. Managing your stay at the hotel:
 - o Monitoring your consumption (telephone, bar, payTV, etc.)
 - o Managing access to rooms
 - o Internal management of the list of customers who have behaved inappropriately during their stay at the hotel (aggression and incivilities, failure to comply with the hotel contract, failure to comply with security rules, theft, damage and vandalism or payment incidents).
5. To improve our hotel, restaurant and cruise services, in particular:
 - o To carry out marketing and brand promotion operations by processing your personal data in our customer marketing operations, in order to better understand your needs and wishes;
 - o To adapt our products and services to better meet your needs;
 - o To personalise commercial offers and messages for you;
 - o To 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:
 - o Qualifying the customer database;
 - o Sending targeted communications thanks to segmentation based on customers' booking history and travel habits;
 - o Being able to make forecasts and anticipate future behaviour;
 - o Implementing statistics and commercial results, and carrying out reporting;
 - o Knowing and managing the preferences of loyal customers or not;
 - o To send you Lavorel Hotels newsletters, promotions and offers for tourism, hotels or services, or to contact you by telephone;
 - o To manage requests to unsubscribe from newsletters, promotions, offers for tourism and satisfaction surveys;
 - o To take account of the right to object;
 - o To use a dedicated telephone service to find people present in Lavorel Hotels group establishments in the event of serious events affecting the site concerned (natural disasters, terrorist attacks, etc.).);
7. To improve Lavorel Hotels' services, in particular:

- o By studying and analysing customer questionnaires and comments;
- o By managing complaints;
- 8. Securing and improving your use of Lavorel Hotels websites, in particular:
 - o Improving navigation
 - o Implementing security and fraud prevention
- 9. Complying with local legislation (e.g. keeping accounting documents).

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. Within the Lavorel Hotels group: in order to provide you with the best possible service, we may share your personal data and give access to authorised personnel of our entities, in particular:
 - o Hotel and catering staff;
 - o Reservation staff using the reservation tools;
 - o IT departments;
 - o Sales partners and marketing departments;
 - o Medical departments, if applicable;
 - o Legal departments, if applicable;
 - o Any appropriate person from the entities of the Lavorel Hotels group for certain specific categories of personal data.
2. With service providers and partners: your personal data may be transmitted to a third party in order to provide you with services and improve your stay, in particular:
 - o 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 the opportunity to follow the news of some of its privileged partners and will inform you of the purpose of the information that will be sent to you. To guarantee you total control over your personal data, without your explicit consent, the Lavorel Hotels group undertakes not to provide this data to its commercial partners.
4. Local authorities: we may also be required to pass on your information to local authorities if this is required by law or as part of an investigation and in accordance with local regulations.

9. DATA SECURITY

Lavorel Hotels takes appropriate technical and organisational measures, in accordance with applicable legal provisions, to protect your personal data against unlawful or accidental destruction, accidental loss or alteration, or unauthorised disclosure or access. To this end, technical measures (such as firewalls) and organisational measures (such as an ID/password system, physical protection, etc.) have been put in place.

When you transmit your credit card details when making your reservation, SSL (Secure Socket Layer) encryption technology is used to ensure the security of your transactions.

10. COOKIES AND OTHER TRACEERS

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

These cookies are necessary to facilitate navigation on our websites and are intended to :

- o manage your authentication on our websites and the associated security, and ensure that the authentication module functions correctly;
- o optimise your experience and facilitate your browsing on our websites;
- o remember the information that you have seen the 'cookies' information banner and have continued browsing, thereby consenting to the insertion of cookies on your terminal;
- o implement security measures (for example when you are asked to reconnect to content or a service after a certain period of time, or in order to ensure the proper basic operation of our websites and the use of their main technical functions such as the monitoring of browsing performance and errors, user session management, etc.). ;

o adapt our websites to your terminal's display preferences (language, currency, display resolution, operating system used, configuration and parameterisation of the display of the sites' pages according to the terminal you are using and its location, etc.); ;

o to memorise certain information that you enter on our websites in order to facilitate and personalise your future browsing (e.g. display of your first and last names if you have a user account and have identified yourself);

o to enable you to access your personal areas more quickly by memorising identifiers or data that you have previously indicated.

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

11. DATA RETENTION

We retain your personal data only for as long as is necessary for the purposes set out in this Charter or as required by applicable law.

With regard to retention periods :

- Personal data collected and processed for the provision of our services is retained for the duration of the contractual relationship, and then on an active basis for 5 years from the end of the service. However, this data may be kept for longer if justified by the needs of the operation (in the event of an ongoing dispute, for example). In any event, where necessary, these periods may be extended until the date on which liability becomes time-barred, at which time the personal data will be pseudonymised;
- Information relating to your bank card is not kept beyond the completion of the transaction.
- Information relating to competitions is kept for the duration of the competition and the awarding of prizes;
- Personal data relating to requests for information, without a contract ensuing, is kept for the time required to reply, plus a maximum of 6 months;
- Personal data processed as part 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 it will be deleted as soon as you express your opposition to its use (see the 'Access and Modification' section below).

12. ACCESS AND MODIFICATION

Your personal data collected by Lavorel Hotels is accessible to you and may be modified subject to 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 department in charge of personal data for the Lavorel Hotels group directly by e-mail at rgpd@lavorelhotels.com or by writing to the following address:

Lavorel Hotels
Data Protection Department
67 quai Charles de Gaulle
69006 Lyon, France

In the interests of confidentiality and the protection of your personal data, we will need to identify you in order to respond to your request. For this reason, a copy of an official identity document, such as a driving licence, identity card or passport, must be attached to your request.

If your personal details are not accurate, complete or up to date, please notify the changes to the Marketing Department indicated above.

All requests will be dealt with as quickly as possible and in accordance with applicable law.

You also have the right to lodge 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 telephone on 01 53 73 22 22 (Monday to Thursday, 9am to 6.30pm / Friday, 9am to 6pm);

- By fax to 01 53 73 22 00.

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

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

If you have a question about your rights with regard to information technology and civil liberties, you can consult the CNIL website: www.cnil.fr.

13. UPDATING

We may amend this Charter from time to time. We therefore invite you to consult this Charter regularly, particularly when making a reservation at one of our entities.

14. QUESTIONS AND CONTACTS

If you have any questions about the Lavorel Hotels Group's personal data policy, please contact the Marketing Department (see 'Access and Modification').