



PRIVACY POLICY

1. General

1.1 DEFINITIONS

In the following, the term "Establishment" refers to restaurants under the Frometon brand name for which it is possible for an individual of legal age to make a reservation. Frometon Chamonix" refers to the company AMH whose head office is located at 72, descente des Périades 74400 Chamonix Mont-Blanc, France. "Frometon Flaine": refers to the company Les Frenchies whose head office is located at 72, descente des Périades 74400 Chamonix Mont-Blanc, France.

1.2 SCOPE OF APPLICATION

As the data controller, we attach great importance to the protection and respect of your privacy. We do not sell or rent your personal data. We collect, store and process this data in accordance with the legal provisions, and in particular Law n°78-17 of January 6, 1978, Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), Law n° 2018-493 of June 20, 2018, and any implementing legislation that may be issued.

This policy is intended to inform you of our practices regarding the collection, use and sharing of information that you may provide to us through our platform (the "Platform") accessible from the restaurantfrometon.com website or our mobile applications.

This Privacy Policy sets out the Data we collect and the purposes for which we process it when you use the services we offer on the Platform. This Privacy Policy also contains important information about the protection of your Data, including your rights regarding your Data. We invite you to read this document carefully to learn about and understand our practices regarding the processing of your personal data by us.

2. The information we collect

The personal information that the establishment will have to treat, and concerning you results from your step with a view to a reservation near our hotel, or with a view to the reception by your care of documentation:



2.1 INFORMATION YOU PROVIDE DIRECTLY TO US

By using our Platforms, you are led to transmit information to us, some of which are likely to identify you ("Personal Data"). This is particularly the case when you fill in forms (such as the online pre-registration form or the newsletter subscription), when you participate in one of our games, contests, promotional offers, studies or surveys, when you contact us - whether by telephone, email or any other means of communication - or when you report a problem.

This information includes the following data:

2.1.1 The data necessary to reserve a table in one of our establishments. These data are in particular your name and first name, email address and country of residence. This information is mandatory. Without it, the establishment will not be able to provide you with the services offered by our Platforms.

2.1.2 Online pre-registration. After booking a table, you can add more information about yourself and/or your companions:

- Mailing address
- Birthday
- Phone number
- Estimated time of arrival
- Type of transportation to the restaurant

2.1.3 A copy of all exchanges between you and our institutions.

2.1.4 A copy of all reservations made on our Platforms.

2.1.5 Details of financial or accounting operations carried out on our Platforms or by any other means, containing in particular information relating to your payment card, your bank details, information relating to stays booked or in which you have shown an interest.

2.1.6 Details of your visits to our Platforms and the content you have accessed.

2.1.7 Where applicable, your responses to our surveys and questionnaires and the opinions you have left in order to evaluate a dinner you have made, this information being likely to be used in particular within the framework of research and analysis of user behaviour.

2.1.8 A copy of your passport, driver's licence, identity card or other similar document that you have agreed to provide to us.

2.1.9 You may object to telephone solicitation by registering with the free governmental service [bloctel](https://www.bloctel.fr).

2.2 INFORMATION WE COLLECT INDIRECTLY THROUGH OUR PARTNERS



If you make reservations via a third-party platform, the operator of the platform in question will transmit personal information to us. In principle, this is the data listed in point 2.1.2 above. We process this data in order to enter your reservation in accordance with your request and to provide the services you have booked. The operators of the partner platforms also provide us with data concerning the booking process, for which a copy of the booking confirmation can serve as proof. Please also note the privacy policies of the respective providers.

3 Why we process your data

These data are necessary for the following treatments:

- Receipt of documents on our establishments and/or its group
- Receipt of follow-up e-mails for the purpose of satisfaction surveys and/or prospecting
- Improvement of our follow-up and customer service
- Reservation of an online service
- Processing of statistics
- Accounting and management of our hotel

In detail, we use the data we collect to :

3.1 Permettre le commerce des services mis en vente : ce traitement est nécessaire à l'exécution de nos obligations contractuelles respectives.

3.2 Verifying your identity and personal data: this processing is based on your consent, necessary to comply with our legal obligations.

3.3 Send you information about our services (such as booking confirmations) by email, SMS or any other means of communication: this processing is necessary for the performance of our respective contractual obligations and/or carried out with your consent.

3.4 Collecting your payments: this processing is necessary for the performance of our respective contractual obligations.

3.5 To send you, in accordance with applicable legal provisions, marketing, advertising and promotional messages. You may at any time revoke your consent to the sending of advertising e-mails to the specified e-mail address with effect for the future by blocking the sending of further advertising e-mails by clicking on the "to unsubscribe" link at the bottom of the advertising e-mail. The revocation does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation. This processing is based on your consent and/or our legitimate interest (providing you with relevant information).

3.6 To evaluate the effectiveness of the advertising messages we send and tailor them to our readers. This processing is based on your consent.



3.7 To manage our Platforms and carry out internal technical operations in the context of problem solving, data analysis, testing, research, analysis, studies and surveys. This processing is based on our legitimate interest (ensuring the security of our Platforms and improving their features).

3.8 To improve and optimize our Platforms, in particular to ensure that the display of our content is adapted to your device. This processing is based on our legitimate interest (providing you with relevant and tailored content).

4 Who we collect information from and why we give it to them:

4.1 The Establishment may use external service providers to provide certain services, who perform certain Data processing on our behalf and at our direction (subcontractors). The establishment selects the subcontractors with the utmost care in accordance with the applicable Data Protection Laws and complies with the provisions of the written contract and other legal requirements for order processing when placing an order.

The operations performed in connection with our order include:

- the provision of the technical infrastructure of the Platform and the provision of storage space - the trust and security of the Platform (such as fraud prevention)

The subcontractors we have appointed may have access to your Personal Data, but may only use it to carry out the processing of the transferred Data, and not for any other purpose. Subcontractors are contractually obliged to ensure a level of Data protection corresponding to ours. All Data processed on our behalf is subject to our control. We continuously monitor compliance with our instructions, the contractual agreements with the processor and the guarantee of the Data protection levels.

4.1.1 4.2 In the event that we sell or acquire a business or assets, in which case we reserve the right to share your Personal Data with the prospective seller or buyer of that business or assets.

4.1.2 4.3 If the Heliopic Sweet & Spa Hotel owned by AMH or any of its assets are acquired by a third party, the data in our possession will, where appropriate, be transferred to the new owner.

5 Disclosure of your data to third parties

The establishment will share the Data with the other entities of the Assas Hotels group. In accordance with the legal provisions, the establishment is obliged to transmit Personal Data and/or Usage Data to investigative, prosecutorial and supervisory authorities if and insofar as this is necessary to prevent threats to public safety and prosecute criminal offences.

6 Use and acceptance of cookies:



When you access our Platform, we also collect your consent before installing additional cookies on your device by displaying a cookie banner that requires your acceptance. These cookies are not absolutely necessary for the functionality and performance of our Platform, but they do help us to see how many visitors visit the Platform and how visitors move through the Platform. This helps us to improve the functionality of our Platform, for example by ensuring that users can easily find what they are looking for (Analytical / Performance Cookies). The cookie banner tells you why we use cookies. By continuing to use our Platform after the cookie banner is displayed, you agree that we may use cookies for the purposes mentioned above ("Acceptance of Cookies").

6.2 INFORMATION WE COLLECT INDIRECTLY THROUGH OUR PARTNERS

You can revoke your consent to the use of cookies at any time by setting your web browser as follows:

If you wish to delete the cookies stored on your terminal and set your browser to refuse cookies, you can do so via your internet browser preferences. These browser options relating to cookies are usually found in the "Options", "Tools" or "Preferences" menus of the browser you use to access this site. However, different browsers have different ways of disabling cookies. To learn more, you can follow the links referenced below: Vous pouvez révoquer votre consentement à l'utilisation des cookies à tout moment, en paramétrant votre navigateur internet de la façon suivante :

- Microsoft Internet Explorer : <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- Google Chrome : <https://support.google.com/accounts/answer/61416?hl=fr>
- Safari : https://support.apple.com/kb/PH19214?locale=fr_FR&viewlocale=fr_FR
- Firefox : <https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences?redirectlocale=fr&redirectslug=activer-desactiver-cookies>
- Opera : <http://help.opera.com/Windows/10.20/fr/cookies.html>

Please note that if you refuse to accept cookies from your browser, you will still be able to browse this site, but some parts and options may not function properly.

6.2 USE OF GOOGLE ANALYTICS

This website uses Google Analytics, a web analysis service provided by Google Inc ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of this website is generally transferred to a Google server in the United States and stored there. We have activated IP anonymization on our platform so that your IP address is shortened by Google in advance in the member states of the European Union or in other states that are signatories to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. Google will use this information on behalf of SAS HIG or one of its subsidiaries to evaluate your use of the website, to compile reports on website activity and to provide Restaurant Frometon, which is owned by SAS AMH and SAS HAF, with other services relating to website



and internet usage. The IP address transmitted by your browser within the framework of Google Analytics is not merged with other Google data. You may refuse the use of cookies by selecting the appropriate settings on your browser. You can also prevent Google from collecting the data generated by the cookie about your use of the website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=fr>

For an overview of Google's privacy policy, you can click on the following link: <https://support.google.com/analytics/answer/6004245>

6.2 USING GOOGLE REMARKETING

We use Google Remarketing technology. This technology allows users who have already visited our Website and experienced our online services, and who are interested in the offer, to be reached again through targeted advertising on the web pages of the Google partner network. The insertion of advertising is done through the use of cookies, which are small text files stored on the user's computer, tablet or mobile. The text files can be used to analyze the behavior of users during their visit to the Website and then for targeted product recommendations and interest-based advertising. We record in Google Analytics the Data obtained by interest-based advertising from Google and visitor Data from third-party providers (e.g. age, gender and interests).

If you do not wish to receive interest-based advertising and/or object to the collection and use of Data, you can disable Google's use of cookies by making the necessary settings in the Google advertising settings (<https://adssettings.google.fr>). Please note that Google may store new cookies for these purposes. If you delete all cookies from your device, you may need to update your opt-out settings. You can also disable the use of third-party cookies by visiting the Network Advertising Initiative's opt-out page (<http://optout.networkadvertising.org/?c=1#!/>).

5 Storage and duration of your data

We store your Personal Data within the European Union.

Unless otherwise specified in this Data Protection Statement or by law, we retain:

- Personal Data referred to in paragraph 2.1 of this Privacy Policy for 8 years from the date of its collection.
- Personal Data relating to your transactions is not retained.

6 We reserve the right to change our privacy policy

As we are constantly developing our services, we reserve the right to change this Privacy Policy in accordance with applicable law. Any changes will be posted on this document in a timely manner. You should check this page regularly for any changes or updates to our privacy policy.

7 Your rights regarding your personal data



In accordance with the legal provisions, you are entitled at any time to:

- Request information about the Data we process as well as a copy thereof ("right to information"). You may also have access at any time to all the Data you have voluntarily provided to us on the Platform in your personal area, and this in a structured, commonly used and readable format ("right to portability").
- You may also request the deletion of your Personal Data as well as the rectification of erroneous or obsolete Personal Data ("right of deletion and right of rectification"). Please note that we may retain certain information about you when required to do so by law or when we have a legitimate reason to do so.
- You may request that we limit the processing of your Data, subject to compliance with legal obligations ("right to limit processing").
- You also have the right to object at any time to the processing of your Data for direct marketing purposes or to the processing described herein ("right to object").
- We undertake that you will not be subject to a decision based exclusively on automated processing, provided that the legal requirements are met. The institution does not currently make any automated decisions.

To exercise any of the other rights mentioned in this paragraph, you may contact the establishment at the contact details below. In addition, without prejudice to any other remedy, you have the right at any time to file a complaint with the competent supervisory authority.

7 Contact

If you have any questions regarding the processing of your Data in the context of the use of the Platform or the exercise of your rights, you can contact us or our Data Protection Officer (DPO) at any time using the following contact details:

By email : dpo@restaurantfrometon.com

Par mail : Frometon

À l'attention du Délégué à la Protection des Données

72 descente des Périades

74400 Chamonix Mont-Blanc, France

In order to ensure full transparency of our processes, we will send you, upon your request, the list attesting to your consent to process your Data. To do so, you may at any time send us an e-mail to the address indicated in paragraph 10 of this Privacy Policy.