

PRIVACY POLICY

1. General information

The Villa Camille Hotel & Spa, which is owned by the company AMH (whose head offices are located at 72 descente des Périades, 74400 Chamonix-Mont-Blanc, France), places a priority on protecting your privacy in its capacity as data controller. We will never sell or lease your personal data. We collect, store and process personal data in accordance with the applicable legal provisions, particularly French Law 78-17 of 6 January 1978, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons 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), French Law 2018-493 of 20 June 2018 and any implementing regulations that may be enacted.

The purpose of this policy is to inform you of our practices in respect of the collection, use and sharing of information that you may provide to us via our platform (the "Platform"), which can be accessed on the website www.hotelvillacamille.com or our mobile apps.

This Privacy Policy specifies which data we collect and the purposes for which we process it when you use the services that we offer on the Platform. This Privacy Policy also contains important information about the protection of your data, particularly your rights in connection with your data. Please read through it carefully to learn about and understand the personal data processing that we perform.

2. Information we collect

The personal information that may be processed by the Villa Camille Hotel & Spa comes from the steps involved in making a booking at our hotel or from documents that you provide to us, as indicated below.

2.1 Information you send to us directly

When you use our Platform, you may be asked to submit information to us, some of which could be used to identify you (your "Personal Data"). For example, this includes when you complete forms (like our online pre-registration form or our check-in form), when you take part in one of our games, contests, promotional offers, studies or surveys, when you contact us by telephone, email or any other means of communication and when you communicate an issue to us.

This information includes the following Personal Data:

- 2.1.1 The data needed to purchase a stay at the Villa Camille Hotel & Spa, namely including your full name, your email address and your country of residence. This information is required in order to process your purchase. If not provided, the Villa Camille Hotel & Spa will be unable to deliver the services offered on our Platform.
- 2.1.2 Online pre-registration, through which you may provide additional information about yourself and/or the members of your party after purchasing a stay:
 - Postal address
 - Birthday
 - Telephone number
 - Expected arrival time at the hotel
 - Planned mode of transport to travel to the hotel
 - Flight/train number
 - Arrival airport/train station.

- 2.1.3 Copies of all your interactions with the Villa Camille Hotel & Spa.
- 2.1.4 Copies of all your bookings made via our Platform.
- 2.1.5 Details of the financial or account transactions carried out via our Platform or by any other means, namely including information about your credit/debit card, your bank details, information about any stays you have booked or in which you have expressed an interest.
- 2.1.6 Details of your visits to our Platform and the content you viewed.
- 2.1.7 As applicable, your responses to our surveys and questionnaires and your reviews of past stays, as this information may be used for the purposes of research and analysis of user behaviours.
- 2.1.8 A copy of your passport, your driving licence, your identity card or any similar document that you have agreed to provide to us.
- 2.1.9 You may decline to receive unsolicited sales calls by telephone by registering your number for free with [Bloctel](#), France's official do not call registry.

2.2 Information we gather indirectly from our partners

- 2.2.1 If you make any bookings using a third-party platform, that platform's operator will send us your Personal Data. In theory, this should involve the data listed as points 2.1.2 and 2.1.5 above. We will process that data so we can input your requested booking and provide the services you have booked. Our partner platform operators will also send us data about the booking process, for which a copy of the booking confirmation may serve as proof. Please be sure to review the privacy policies of each of these providers.
- 2.2.2 When you make a booking, our payment service partner will collect Personal Data relating to the payment method you use (full name, email address, telephone number, credit/debit card number, card expiry date, card security code, etc.). This data is used to confirm payment of your booking. We keep this payment information for 15 months, which corresponds to the limitation period for disputing a transaction. Pursuant to current regulations, we never store any credit/debit card security codes. You may, at any time, submit a request asking us to delete this data.

3. Why we process your Personal Data

Your Personal Data is necessary for the following processing actions:

- Transmission of documents about the hotel and/or its group
- Transmission of follow-up emails for the purpose of satisfaction surveys and/or direct marketing
- Improvement of our customer service and follow-up
- Online bookings
- Statistical analyses
- Accounts and management of our hotel
- Handling of lost property.

More specifically, we use the Personal Data we collect in order to:

- 3.1 Enable the fulfilment of the services we sell: this processing is necessary to the performance of our respective contractual obligations.

- 3.2 Verify your identity and your Personal Data: this processing is based on your consent and is necessary to the fulfilment of our legal obligations.
- 3.3 Send you information about our services (such as booking confirmations) by email, text message or any other means of communication: this processing is necessary to the performance of our respective contractual obligations and/or is done with your consent.
- 3.4 Collect your payments: this processing is necessary to the performance of our respective contractual obligations.
- 3.5 Send you marketing, advertising and promotional messages, in accordance with the applicable legal provisions. You may withdraw your consent to receive marketing emails in future by clicking on the unsubscribe link at the bottom of any of our marketing emails. This withdrawal of consent will not affect the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal. This processing is based on your consent and/or our legitimate interest (providing relevant information to you).
- 3.6 Evaluate the effectiveness of our marketing messages and adapt them to our readers: this processing is based on your consent.
- 3.7 Manage our Platform and carry out in-house technical actions within the context of problem solving, data analysis, analytics, testing, research, studies or surveys: this processing is based on our legitimate interest (ensuring the security of our Platform and improving its features).
- 3.8 Improve and optimize our Platform, particularly to ensure that our content displays correctly on your devices: This processing is based on our legitimate interest (providing relevant information tailored to you).
- 3.9 Send you any personal belongings you left at our hotel, at your request.

4. Recipients of the information we collect and why we share it with them

4.1 The Villa Camille Hotel & Spa may use outside service providers (data processors) to deliver certain services, who perform certain Personal Data processing actions on our behalf and at our instruction. The Villa Camille Hotel & Spa's processors are selected with the greatest possible care, pursuant to current data protection legislation and in accordance with the provisions of our written contract and other legal requirements relating to the processing of orders placed by customers.

The services we commission include:

- Provision of the Platform's technical infrastructure and storage space
- Platform reliability and security (such as fraud prevention).

The processors that we use may have access to your Personal Data but are only permitted to use it for our data processing, to the exclusion of any other purposes. Our processors are contractually bound to guarantee a level of data protection that is at least equivalent to our own. All the Personal Data processed at our request are subject to our supervision. We continuously monitor our processors' compliance with our instructions, our contractual agreements with our processors and the guaranteed level of data protection.

4.2 Should we plan sell or acquire a company or other assets, we reserve the right to share your Personal Data with the potential buyer or seller of that company or those assets.

4.3 If all or part of the assets of the Villa Camille Hotel & Spa are purchased by a third party, the data in our possession will be transferred to the new owner, as applicable.

5. Disclosure of Personal Data to third parties

The Villa Camille Hotel & Spa may share your Personal Data with other entities belonging to the Assas Hotels group. Pursuant to the applicable legal provisions, the Villa Camille Hotel & Spa may be compelled to transmit Personal Data and/or usage data to

investigating, judicial or supervisory authorities, if and insofar as this should prove necessary in order to prevent threats to public security and prosecute criminal offences.

6. Use and acceptance of cookies

6.1 When you access our Platform, we will also gather your consent before installing any cookies – small text files stored on your device to record a variety of information about your use of our website – by means of a banner that you must accept. These cookies are not strictly necessary to the functionality and performance of our Platform, but they do help us see how many users visit it and how they move around on it. In turn, this helps us improve our Platform’s functionality, for example by ensuring that users can easily find what they are looking for (analytical/performance cookies).

The cookies banner will inform of the reasons why we are using cookies. By continuing to use our Platform after the cookies banner appears on your screen, you are agreeing that we can use cookies for the purposes mentioned above.

6.2 What to do if you do not want cookies

You can revoke your consent to the use of cookies at any time, by configuring your web browser as follows.

If you want to delete any cookies saved on your device and configure your browser to block cookies in future, you can do this via your web browser’s settings. Your cookie settings can usually be found in the “Options”, “Tools” or “Preferences” menu of the browser you use to access the Platform. However, different means may be used to disable cookies, depending on the browser. Follow the links below for more information about disabling cookies in the most common browsers:

- 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>
- Safari: <https://support.apple.com/kb/PH19214>
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Opera: <http://help.opera.com/Windows/10.20/en/cookies.html>.

Please note that, if you block cookies in your web browser, you will still be able to navigate our website, but some sections or options may not function correctly.

6.3 This site uses Google Analytics, a web analysis service from Google Inc. (“Google”). Google Analytics uses cookies, which are text files placed on your computer to help analyse how a website’s users utilize the site. The information generated by those cookies and relating to your use of the website is usually sent to a Google server in the United States and stored there. We have activated IP anonymization on our Platform, meaning Google will shorten your IP address, in advance of these data transfers, in the Members States of the European Union and in countries that have signed the European Economic Area (EEA) Agreement. Only in very special circumstances will complete IP addresses be sent to a Google server in the United States. Google will use this information, in the name of Assas Hotels or one of its establishments, to analyse your usage of our website, compile website activity reports and provide other services associated with use of the website and the internet to Villa Camille Hotel & Spa. The IP address communicated by your browser for Google Analytics will not be merged with other Google data. You can block cookies by adjusting the relevant settings in your browser. You can also prevent Google from collecting and processing cookie data relating to your use of our website (including your IP address) by downloading the browser add-on available here: <https://tools.google.com/dlpage/gaoptout>.

Click here for an overview of Google’s privacy policy: <https://support.google.com/analytics/answer/6004245>.

6.4 Use of Google Ads remarketing

We use Google's remarketing technology, which allows us to reach users who previously visited our website and tried our online services, and who are interested in our establishment, by means of targeted advertising displayed on the web pages of members of the Google Partners network. The adverts are inserted using cookies, which are small text files stored on your computer, tablet or smartphone. Cookies can be used to analyse user behaviour on a website and then recommend targeted products and advertising based on their interests. In Google Analytics, we save the Personal Data gathered by our interest-based advertising and the Personal Data of visitors provided by third-party suppliers (such as age, gender and interests).

If you do not want to see interest-based adverts and/or have your Personal Data collected and used, you can disable Google cookies by making the necessary changes to your Google Ads settings (<https://adssettings.google.co.uk>). Please note that this may result in Google installing new cookies for that purpose. So, if you delete all the cookies on your device, you may need to re-update your cookie settings. You can also disable third-party cookies by visiting the Network Advertising Initiative's opt-out page (<http://optout.networkadvertising.org>).

6.5 Use of the Facebook pixel

We use Facebook's tracking pixel technology. This pixel is embedded on our website and allows us to run advertising campaigns and publish posts on Facebook and Instagram aimed at visitors to our website. These advertising campaigns and posts are targeted based on your interests. More information about the Facebook pixel is available at <https://www.facebook.com/business/gdpr>.

7. Personal Data storage and storage period

We store your Personal Data inside the European Union.

Unless otherwise stated in the Privacy Policy or in the applicable legal provisions, we store Personal Data as follows:

- Personal Data covered by Article 2.1 above: for eight years from the date of its collection
- Personal Data relating to your transactions are not retained

8. Changes to this Privacy Policy

As we are continuously enhancing and expanding our services, we reserve the right to modify this Privacy Policy, in accordance with the applicable legal provisions in effect. All changes will be published in this document in due time. We recommend that you check this page on a regular basis to review any changes or updates made to our Privacy Policy.

9. Your Personal Data rights

In accordance with the applicable legal provisions, you have the right, at any time, to:

- Request information about the Personal Data we process and a copy of your Personal Data (your "right of access") Request access to all the Personal Data that you voluntarily provided to us via your account on the Platform, in a structured, commonly used and machine-readable format (your "right to data portability")
- Request the erasure of your Personal Data and the rectification of any incorrect or obsolete Personal Data (your "right to erasure" and "right to rectification"), bearing in mind that we may keep certain Personal Data where required by law or where we have legitimate grounds to do so
- Request the restriction of the processing of your Personal Data, subject to the applicable legal obligations (your "right to restriction of processing")

- Object to the processing of your Personal Data for direct marketing purposes or to the processing described herein (your “right to object”).
- We will ensure that you are not subject to any decisions based solely on automated processing, so long as this meets our legal obligations. The Villa Camille Hotel & Spa currently engages in no automated decision-making.

To exercise any of the rights listed in this section, you can contact the Villa Camille Hotel & Spa, at the addresses provided below. Further, without prejudice to any other legal recourse, you have the right to lodge a complaint with the competent supervisory authority at any time.

10. Contact

Should you have any questions about the processing of your Personal Data in connection with your use of our Platform or about exercising your rights, you can contact us or our Data Protection Officer (DPO) at the following addresses:

By email: dpo@hotelvillacamille.com

By post: Villa Camille Hotel & Spa

À l'attention du Délégué à la Protection des Données

11 avenue Pierre Fabre

66650 Banyuls-sur-Mer, France

To ensure the total transparency of our processes, we will send you a list of the consent you have granted for Personal Data processing, at your request. To request this list, please write to us at the email address provided above.