



CLUB MED'S PRIVACY POLICY

Club Méditerranée Group ("Club Med") attaches great importance to protecting your personal data and closely ensuring compliance with protective provisions relating to privacy and processing personal data.

The purpose of this charter (the "Charter") is to provide you with information on Club Med's use of your personal data in the scope of your use of the website www.clubmed.us (the "Website"), to the exclusion of your bookings and purchases of products or services.

Club Med's General Terms and Conditions of Sale specify use of your personal data in the latter cases, which are also available on the Website (heading "Terms and Conditions of Sale"). This Charter does not apply to services and websites which are not provided to you by Club Med and which you may access from the Website. If you use said services and websites, you are advised to consult the terms and conditions thereof relating to data protection.

1. DATA PROTECTION

Personal data includes information regarding you as a natural person, which you voluntarily provided to Club Med when using the Website, such as your first name, last name, e-mail address, etc.

Personal data is used in order to:

- provide you access to the Website, for example to authenticate you in order to access the Personal Area which is reserved for identified persons,
- send you Newsletters and any other documents (in particular, Trident Brochures) that you have accepted to receive,
- send you, subject to your express prior consent, commercial offers, enable you to take part in games and competitions,
- carry out anonymous studies and research to improve the Website and/or your online experience, and
- For internal statistics purposes.

Some information which you are asked to provide is mandatory and is indicated by an asterisk. If you do not provide the information, Club Med cannot perform the requested services or send you the requested information.

2. DATA PROCESSING

The data processing administrator is the company Club Méditerranée SA, which undertakes to protect your privacy and to this end comply with in force legislation, including inter alia the provisions of the Data Protection Act of 6 January 1978 as amended in 2004 and recommendations issued by the Data Protection Authorities (the “in force Legislation”).

For the purposes set forth in Article 1 hereinabove, you accept that your personal data collected by Club Med be stored, processed and transferred to its subsidiaries and/or service providers, acting on its instructions, which are only permitted to access your personal data to perform certain tasks required to carry out the purposes stipulated in Article 1 hereinabove, in strict compliance with your data protection rights and in force Legislation.

Your personal data collected by Club Med will not be transferred to third parties, for no charge or against payment, without your express prior consent. Personal data will not be stored beyond the duration required to carry out the purposes stipulated in Article 1 hereinabove.

3. CHILDREN

The Website is not intended for young persons under the age of 18 without their parents’ permission. Unless otherwise provided by law or request made to the parents, Club Med does not collect data regarding children.

4. COOKIES

4.1 When you use the Website, Club Med can place a file called a “cookie” on your terminal (e.g., computer, tablet) using your browser.

A cookie allows us to identify your computer when you next visit the Website during its term of recording.

Therefore, every time you consult the Website, the data from your previous visit will be retrieved.

Cookies do not generate or transmit viruses.

Some cookies are required to use the Website and other cookies allow the displayed content to be optimized and customized. The second type of cookies is only installed with your express prior consent.

4.2 Cookies required using the Website

Club Med may use cookies which are strictly required to provide the services or information which you have expressly requested, including inter alia:

- Cookies relating to "your Personal Area user name and password";
- shopping basket cookies;
- Authentication cookies;
- load balancing cookies;
- Persistent user face customization cookies;

- Audience analysis cookies (“statistical cookies”).

Data collected by statistical cookies is not correlated with other data processing and is only used to produce anonymous statistics.

These cookies do not enable your visits to other websites to be tracked or your accurate geographical location to be determined.

You can simply refuse cookies, including in particular statistical cookies (“see “Disabling cookies” below”).

4.3 Optimization and customization cookies

Club Med can use cookies in order to optimize and customize your browsing on the Website.

These cookies are used to monitor the Website’s performance and, subject to your express prior approval, analyses how you use the Website. These cookies help us provide a high quality browsing experience by customizing the Website’s services and swiftly resolving any problems.

Club Med may, for example, use performance cookies to determine which are the most popular pages and what is the best method for linking one page to another, and detect why some pages trigger error messages.

In particular, Club Med uses the following cookies:

Editor: Adobe Analytics

Cookie name / Purpose:

Cmclid / C_m: Identify where a user comes from when he/she accesses the Website

s_cc: Know whether the user’s browsing settings accept or refuse cookies to be stored

s_sq: Know the last page the user visited

s_vi: Track the browsing history on the Website

iccm: Recognise the user throughout our Website

Editor: Kameleoon

Cookie name / Purpose:

kameleoonVisitIdentifier / kameleoonSessionId: Test new functionalities on the Website

Notwithstanding any other provision, we may also engage a third party partner for the purpose of identifying users and delivering to them interest-based content and advertisements. We may share information about you with our partners such as a non-human-readable form of your email or other identifier to ensure the security of your information. Our partners also may collect information directly from your device, such as your IP address, device ID, and information about your browser or operating system; may combine our personal and non-personal information about you with information from other sources; and may place or recognize a unique cookie on your browser. To opt out of LiveRamp’s services, please go to http://www.liveramp.com/opt_out. To opt-out of third party cookies, please go

to <http://www.aboutads.info/choices>. To opt-out of the use of your mobile device ID for targeted advertising, please see <http://www.aboutads.info/appchoices>

4.4 Cookie settings

You can customize your browser in order to accept or refuse cookies.

You can either allow all cookies, be notified when a cookie is stored or refuse all cookies. If you refuse all or part of the cookies, the Website may not function properly or some pages may be inaccessible.

Adjusting cookie settings:

If you use Internet Explorer 8. and above:

1. Open “Tools” in the menu and click on “Internet options”
2. Click on the “Privacy” tab
3. Move the slider to the top to “Block all cookies” in order to block all cookies, or to be bottom to “Allow all cookies” in order to allow all cookies. For additional information, please consult <http://windows.microsoft.com/fr-fr/internet-explorer/delete-manage-cookies>

If you use Firefox 30.0 and above:

1. Click on the “menu” button and choose “Options”
2. Select the “Privacy” panel.
3. In the “History” section with regard to the settings for “History”, select “Use custom settings for history”.
4. Check mark “Accept cookies” to enable cookies, or uncheck it to disable them. If you are troubleshooting problems with cookies, make sure that the option “Accept third party cookies” is also not set to “Never”.
5. Choose how long cookies are allowed to be stored:

Keep until: “They expire”: Each cookie will be removed when it reaches its expiration date, which is set by the website that sent the cookie.

Keep until: “I close Firefox”: The cookies that are stored on your computer will be removed when Firefox is closed.

Keep until: “Ask me every time”: Displays an alert every time a website tries to send a cookie, and asks you whether or not you want to store it.

6. Click on OK to close the “Options” window.

For additional information, please consult <https://www.mozilla.org/en-US/privacy/websites/>

If you use Google Chrome:

1. Click on “Tools” in the menu

2. Click on “Settings”
3. Click on “Show advanced settings”
4. Click on “Privacy/Content settings”
5. “Cookies” must be selected. Then select “Block third-party cookies and site data” For additional information, please consult <https://support.google.com/chrome/answer/95647?hl=en>

If you use Safari 5.0:

1. Select Safari > Preferences and click on “Security”.
2. In the section “Allow cookies”, set whether Safari should accept cookies from websites. To see an explanation of the options, click the “Help” button (question mark). If you have set Safari to block cookies, you may need to temporarily accept cookies to open a page. Repeat the above steps, selecting “Always”. When you are finished with the page, block cookies again, and then remove the page’s cookies.

For additional information, please consult <https://support.apple.com/en-us/HT201265>

If you have a different browser type or version, please consult the “Help” menu for your browser.

5. YOUR RIGHTS

In accordance with in force Legislation, you are entitled to access and correct your personal data, and oppose processing of your personal data on legitimate grounds.

To exercise these rights, please send a letter by post to the following address: Guest Relations, Club Med Sales, Inc., 2151 E. Broadway Road, Suite 217, Tempe, AZ 85282 USA and attach a photocopy of your identity card.

Moreover, you can refuse to receive Club Med’s commercial e-mails by clicking on an unsubscribe link contained in these e-mails.

6. AMENDMENTS

Club Med may be required to amend this Charter, including inter alia, if in force Legislation changes. All amendments will be displayed on this page. By consulting it each time you connect to the Website, you will always be kept up-to-date regarding the personal data collected and how Club Med may use such data.