

## **INFORMATION NOTICE CONCERNING THE CLUB MED GROUP EMPLOYEE DATA PROTECTION POLICY**

Club Med (hereinafter referred to as "Club Med" or "Us/We"), its subsidiaries, and its partner companies which own managed Club Med resorts place a great deal of importance on the protection of your personal data and carefully monitor the respect of legislative and regulatory provisions, in Europe and in France, pertaining to the protection of privacy and personal data processing as well as recommendations issued by its supervisory authority (hereinafter referred to as "Current Legislation").

Club Med notably has, for this purpose, internal personal data protection and information system security policies intended for all employees who may be required to process such data.

This information notice is intended to outline how and when Club Med (SAS company registered on the Paris Trade and Companies Register under number 572 185 684 and the registered office of which is at 11 rue de Cambrai, 75019 Paris), as data controller, collects, uses and sends information which directly or indirectly identifies its employees and those of its subsidiaries or partner companies which own managed Club Med resorts ("Personal Data"). This document is also intended to inform employees of their rights in terms of Personal Data protection.

This document outlines and addresses the following points:

1. To whom is this information notice applicable?
2. What Personal Data is collected by Club Med?
3. For what purposes is the Personal Data we collect used?
4. For how long is your Personal Data stored?
5. What categories of recipients receive your Personal Data?
6. On what legal basis do we use your Personal Data?
7. Is your personal data transferred outside of the European Union?
8. Your Personal Data rights.
9. Protection of your Personal Data by Club Med.
10. Modification of the information notice

### **1. To whom is this information notice applicable?**

This is intended for all employees whether or not bound by an employment contract with Club Med, with one of its subsidiaries, or with a partner company which owns a resort managed by a company forming part of Club Med group.

As part of the specific process, data concerning dependants or family members of the employees may also be processed by Club Med, if legitimate, necessary and in proportion.

## **2. What Personal Data is collected by Club Med?**

### **2.1 Information that you have directly sent us**

We collect, process and store Personal Data:

- at the time of your application, with a view to signature of your employment contract,
- and subsequently, throughout the performance of said contract,
- and then after the end of contractual relations, to respect our legal obligations and, where applicable, to defend our legitimate interests.

Personal data concerns:

- personal identification and contact details (civil status, age, sex, date of birth, nationality, address(es), telephone number(s), ID document numbers, social security numbers, photo, etc.);
- the financial identification (bank account number, garnishment of wages);
- remuneration and social benefits;
- personal characteristics (family, dependants, heirs for various benefits or insurances, residence and work permits for foreign employees, studies, diplomas, etc.),
- professional life and career (qualifications, professional experience, training, posts occupied with dates of occupancy, etc.);
- work organisation including professional travel;
- medical fitness for employment;
- security.

As part of certain processes (your departure on international mobility or management of company benefits, for instance), it is also necessary and justified that you send us data pertaining to your dependants or family members. You hereby undertake to obtain the prior consent of these persons in order to send their personal information to Club Med and to inform them hereof.

Club Med only collects legitimate and necessary data to be used for the following purposes:

- Drafting and performance of the employment contract,
- Fulfilment of legal obligations imposed on the employer in the framework of working relations,
- Support and development of employees' skills,

- Smooth operation of the company (work organisation, security of clients and employees, maintenance and optimisation of its tools) and defence of legitimate interests.

For all of these reasons, personal data should be provided to Club Med.

You may choose not to send certain information which is not collected on a compulsory basis (in Workday, compulsory information is identified with an asterisk). However, this decision may not allow you to receive certain benefits or services.

## **2.2 Personal data originating from other sources.**

French or foreign bodies or authorities may send Club Med personal data in accordance with regulations in force in countries. For instance, in France, Club Med may receive and process fiscal data in terms of the Nominative Social Declaration, of the withholding tax deduction (from 2019) or in terms of the garnishment of wages.

Moreover, in terms of internal processing according to the purposes outlined hereinabove, Club Med may have to enter employees' professional data. For instance, Club Med may indicate training received via Club Med or career management information.

Club Med may also enter civil status data, for instance in order to obtain a visa following professional mobility.

## **3. For what purposes is the Personal Data we collect used?**

Your Personal Data is used so as to:

### **3.1 Draft, and then perform employment contract(s) signed**

Your Personal Data is used to enable performance of employment contract(s) signed between you and Club Med or a subsidiary or a partner company which owns a managed resort.

They are notably used to:

- Prepare your recruitment and for all compulsory formalities and declarations concerning your recruitment,
- To calculate and pay your wage as well as any ancillary remuneration,
- Send you documents and information,

- Allow you and your beneficiaries to receive social benefits and cover,
- To guarantee administrative support and fulfil contractual and legal obligations,
- To manage your working hours pursuant to your employment contract and labour law,
- To perform your assignment and undertake your operational or geographical mobility in line with the terms and conditions agreed between us,
- To organise your supervision and development of skills and, notably, to offer you training and performance evaluations.

In carrying out our activities, we may make use of service providers hired to provide certain services to us or on behalf of the subsidiary or partner company which employs you.

As an example, the performance of payroll operations or certain training programs are entrusted to service providers. Consequently, we send these service providers only that data required and in proportion to the desired purposes.

Moreover, pursuant to agreements concluded with our service providers, they may not use this information for any other purposes than those strictly required for the performance of the services and are bound to process this information in strict respect of Legislation in force.

### **3.2 Fulfilment of legal obligations imposed on the employer in the framework of working relations**

Club Med, its subsidiaries, and its partner companies should, as employers, fulfil legal obligations for working relations and employment contracts binding them to their employees.

These obligations may be recurrent and periodical, notably obligations for declarations pertaining to staff administration, payroll and recruitment. These obligations may also be ad hoc and fulfil a legal or judicial requirement of Club Med or bodies and authorities - whether French or foreign.

Club Med only processes and sends this data in a legitimate and proportionate manner and thereby only fulfilling necessary and justified purposes.

### **3.3 To support and develop employees**

Pursuant to their HR ethos and policy, Club Med, its subsidiaries and partner companies place talent development at the heart of their priorities and focus on allowing employees to grow within the company. Consequently, Club Med collects, processes and uses employees' personal data to foster skills and career development (for processing such as career and development management, mobility and training management, as well as the evaluation of skills and performances).

### **3.4 Ensuring proper operation of various establishments and company services as well as the security of employees and clients.**

Personal data of employees is also used to coordinate organisation and activities, such as reporting of staff and the establishment of budgets, as well as the security of work places and travel and health prevention.

We can, also, use your Personal Data to improve, optimise and maintain our services and tools in compliance with Current Legislation. For instance, this includes ensuring that the display of our various content is adapted to the workstation you use, to allow us to host your Data on even more secure Servers, to undertake technical tests or anonymise your Data.

In all of these instances, Club Med only processes your Data for legitimate and proportionate purposes and only fulfils necessary and justified objectives.

## **4. For how long is your Personal Data stored?**

Generally, your Personal Data will only be stored for the time required for performance of operations for which the said data has been collected (processing purposes cf. article 3 of the notice).

Subsequently, essential data will be retained and stored in compliance with legal obligations and rules on statutory limitations of legal action. Data will then be deleted when the ground justifying their storage is no longer necessary.

## **5. What categories of recipients receive your Personal Data?**

We may share your Personal Data with various third parties, and notably:

- with our subsidiaries and our partner companies which own managed resorts and which are also subject to compliance with the provisions set forth under this notice;
- with our suppliers and/or sub-contractors who process your data on our behalf, according to our instructions, for the purposes outlined under article 3. We ensure in particular that these third parties offer sufficient guarantees to ensure protection and security of your Data;
- with bodies and authorities - French and foreign - duly authorised, notably to fulfil legal obligations imposed on the employer in the framework of working relations.

## **6. On what legal basis do we use your Personal Data?**

To process your Personal Data we rely on various legal bases, and notably:

- your consent for processing data collected for your recruitment;
- performance of your employment contract;
- the need to ensure compliance with a legal obligation or to act in defence in the case of legal action;
- fulfilment of legitimate interests of Club Med, its subsidiaries and partner companies which own managed resorts.

## **7. Is your personal data transferred outside of the European Union?**

We may transfer your Data to countries which are located outside of the European Union for the sole purposes outlined in this notice.

For each transfer, we ensure that your Data benefits from an adequate level of protection equivalent to that offered in the EU.

Transfers are solely undertaken to countries recognised by the European Commission as offering a suitable level of data protection.

In the case where data is transferred to a country which does not offer a suitable level of protection, Club Med and its subsidiaries, partners or service providers undertake to transfer your Data in strict compliance with current Legislation and, where applicable, to support the transfer with appropriate guarantees (certification mechanism or signature of standard contractual clauses of the European Commission) for which you may request notification by a letter sent to the address appearing under article 8.4 hereunder.

## **8. Your Personal Data rights.**

### **8.1 Your rights to access, amend, delete and object.**

You are entitled to request us to access, correct, update or delete your personal data.

You may personally access and amend some of this information on your Workday profile. To access all information and/or request a data change, kindly send a written request to Club Med, Digital RH, 11 rue de Cambrai, 75957 Paris Cedex 19, France.

You are also entitled to delete your Personal Data in certain precise instances set forth by law, notably: data no longer required for the purposes for which it was collected or processed, objection to processing.

Finally, you have a right to object to processing of your Personal Data. This right is accompanied by a certain number of legal conditions, notably the obligation for the processing manager to demonstrate the existence of legitimate and fundamental grounds prevailing over the right to objection (for instance: performance of the employment contract).

## **8.2 Right to portability of Personal Data**

The right to portability offers you the chance to recover some of your Data, namely:

- Data you sent us directly as detailed under point 2.1;
- Data generated and collected by your activities within Club Med in the context of working relations.

We will endeavour to respond to your request within a reasonable deadline and, in all instances, within deadlines set forth by Current Legislation.

## **8.3 Definition of instructions concerning what happens to your Personal Data**

You are entitled to define general or special instructions pertaining to the storage, deletion and communication of your Personal Data after death.

## **8.4 Contacts**

To exercise these rights, kindly send a letter to the following address: Club Med, Digital RH, 11 rue de Cambrai, 75957 Paris Cedex 19, France, attaching a copy of your ID document.

At any time, if you believe that your rights have not been respected, you have the option of lodging a complaint with the DPO at Club Med at: CLUB MED, DPO, 11 rue de Cambrai-75957-Paris Cedex 19, France, or with the French Data Protection Authority (CNIL) ([www.cnil.fr](http://www.cnil.fr)).

## **9. Protection of your Personal Data**

Club Med undertakes to guarantee the integrity and reliability of data entrusted to it, notably by taking all physical, organisational and logistical measures required to prevent any alteration or destruction of data by offering secure access solely to persons authorised to process such data.

## **10. Modification of the information notice**

Club Med may have to amend this information notice, notably if current Legislation changes. Any modification will be displayed on this page.

Updated version on November, 12<sup>th</sup>, 2018.