

PRIVACY POLICY

Club Med SAS, registered in the Paris Trade and Companies Register under number 572 185 684 and its subsidiaries (hereinafter, “Club Med” or “We”), believe it is important to protect your personal data and ensure strict compliance with provisions relating to the protection of privacy and the processing of personal data, especially the European Regulation on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (EU Regulation 2016/679 of 26 April 2016), the French Data Protection Act (*Loi informatique et libertés*) of 6 January 1978, as amended in 2004¹ (hereinafter, the “**laws in force**”).

The purpose of this personal data protection charter (hereinafter, the “**Charter**”) is to describe how and when Club Med, as a data controller, collects, uses and discloses certain personal data (hereinafter, the “Data”) you send us to respond to your requests and optimise and improve the quality of our services.

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1. When does this Charter apply?

This Charter informs you how your Data is collected, processed, and used when:

- You book a stay with Club Med;
- You visit the Club Med website or our mobile application (hereinafter, the “Website”);
- You subscribe to our Club Med newsletter (information on products & special offers) and customised content;
- You contact our Customer Service Department;
- You take part in our contests.

2. What Data does Club Med collect?

2.1 Data sent to us directly

You provide us with your Data when:

- You register on the Website by filling in the various forms relating to your account or by uploading Data;
- You book a holiday package;
- You take part in contests;
- You complete a Club Med questionnaire;
- You communicate with our Customer Service Department.

This Data may, for instance, consist of your:

- Last and first name(s);
- Date of birth;
- Gender;
- Mailing address;
- Email address;
- Telephone number(s);
- Means of payment;
- Booking history.

The same applies for any information you provide about anyone for whom you book a holiday package. In this respect, you agree to obtain their prior consent before disclosing their Data.

You may opt not to disclose certain information to us; however, this decision may prevent you from using our services. The required information for the provision of our services is identified with an asterisk in our information gathering forms.

2.2 Data automatically collected

While browsing the Website, Club Med may collect Data on the following, in strict compliance with the laws in force and your rights:

- Features of the operating system, browser or devices (computer, pad, smartphone) you use to access our services;
- Your location, such as your IP address;
- Your browsing path and interactions with the content of the Website, such as pages viewed, key search words used, frequency of your visits to the Website, advertising clicked on.

This browsing Data is collected using cookies. For more information on cookies, see Question 4.

3. How does Club Med use the Data collected?

3.1 Data from other sources

We may also collect Data through third parties, including in particular social media, when you register or log in to our services using a third-party account. When you do this, you will be informed of the Data transferred to us by the relevant third party.

We use, store and process your Data to process your requests, manage our commercial relationship, and optimise our services and tools to create and maintain a more secure environment and to comply with our statutory obligations.

3.2 Performing a contract

We use your Data to manage your holiday package booking and to perform various related services.

In particular, we use your Data to process your payments, to inform you by text message, e-mail or any other means of communication about how the contract you enter into with us is performed (information on your journey, any transport delays, on your loyalty program "Great Members", extra services proposed, etc.).

As part of our commercial activity, we may use commercial partners to provide certain services on our behalf.

For instance, we do not have our own fleet of aircraft, trains or coaches. We are required to enter into contracts with various carriers to offer you ways of getting you to our various resorts. Accordingly, some of your Data (last name, first name, date of birth, etc.) will be provided to the carrier in order for it to issue you a travel ticket.

Our business partners may not use your Data for purposes other than those required to perform services that you have requested. They are also required to process your Data in strict compliance with Existing Legislation.

3.3 Providing you with access to the Website and certain services

We use the Data you provide to identify you in order to access your Account on the Website (hereunder "Customer Account"), access to which is restricted to authenticated persons.

3.4 Sending you Club Med's newsletter and customised content

If, while booking a holiday package, setting up your account on the Website or thereafter within your Customer Account, you ticked the box or filled in the form to receive Club Med's newsletter (information on Club Med products and commercial offers) and customised content, we may use your Data to send you the following, according to your preferences (in particular, by e-mail, text message, telephone or letter):

- Information on the Website;
- Invitations to Club Med events which may be of interest to you;
- Information on our offers;
- Information on updates to the Charter or security measures.

To stop receiving commercial offers and communications from Club Med, you may at any time unsubscribe by either (i) clicking on the unsubscribe link or completing the objection process indicated in Club Med communications or (ii) contacting us (see Section 8 below). You may also object to receiving telemarketing calls by registering with Bloctel.

We may also use your Data to send you advertising messages which may be of interest to you on third-party websites or on social media platforms. For more information, we suggest you read the terms relating to the use of your Data on these third-party websites and/or platforms.

3.5 For profiling purposes

We may also process your Data for profiling operations.

Profiling is the automated process of your Data to analyse, anticipate and assess your interests and preferences in order to send you customised content and commercial offers suited to your specific requirements.

Club Med will only share your Data with third-party service providers to determine your profile and preferences and send you more relevant Club Med content. Club Med will not disclose your Data to commercial partners.

You may object at any time to the use of your Data for profiling purposes by accessing your Account or by contacting us (see Section 8 below).

3.6 Optimising the Website and our services

We use your Data to carry out analyses, technical tests (which might include the anonymisation of your Data) and data deduplication in order to improve and optimise the Website and customise our tools and services. This means, for example, ensuring that the display of our content is adapted to your device or hosting your Data on even more secured servers, etc.

3.7 Handling complaints

When you contact our Customer Service Department by telephone or using the contact form available on the Website or by any other means made available by Club Med (social

media, chat, etc.), we use your Data (including the recordings of your calls, with your prior consent) to:

- respond to and resolve your complaint;
- track and manage the follow-up of your complaint;
- improve customer service.

3.8 For internal statistics and surveys

We may use your Data to carry out various statistical analyses and/or to ask you to take part in our surveys.

3.9 Ensuring compliance with legal and judicial obligations

Your Data may be used to:

- respond to a request from an administrative or judicial authority, a law enforcement representative, an officer of the court or to comply with a judicial decision;
- ensure compliance with our general terms and conditions of sale and with the Charter;
- protect our rights and/or obtain compensation for any harm we may suffer or mitigate the consequences thereof;
- prevent any act contrary to the laws in force, including in particular the prevention of fraud risks.

3.10 Managing your participation in contests

When you participate in contests, you provide us with a certain amount of Data. This Data is essential in order for you to participate and for us to award a prize.

With your prior and express consent, we may use this Data to send you the Club Med newsletter (information on products and commercial offers) and customised content.

3.11 Managing your participation to solidarity projects identified by the Club Med Foundation

When you participate to funds raising “Club Med Foundation Funds” which gather financial donations from our Customers willing to support solidarity projects identified by the Club Med Foundation, you will provide us with some Data. This Data will be necessary to take into consideration your participation and allows the sending of your tax receipt.

4. What cookies does Club Med use?

4.1 What are cookies?

When you use the Website, Club Med may place a text file called a “cookie” in the browser files of your computer (or tablet/pad, etc.). When enabled, these cookies are used to identify your computer on your next visit. Whenever you visit the Website, the settings from your previous visit are saved.

4.2 What cookies does Club Med use?

Club Med uses the cookies listed hereafter.

You can block the use of the Cookies (following the instructions detailed in “How to disable Cookies?” below)

a) Cookies needed to provide the services requested

Club Med uses cookies which are strictly necessary to provide you with requested services and/or information, including in particular:

- session ID cookies;
- shopping cart cookies;
- authentication cookies;
- load balancing session cookies;

b) Analytics Cookies

Club Med uses tracking and analytic cookies (“statistical cookies”).

Data collected from statistical cookies is not cross-checked with other data processed (or is previously anonymised) and is only used to collect anonymous information about the user’s behaviour on our Website.

These cookies are not used to follow users’ surfing behaviour after visiting our Website nor are they used to geolocate a visitor.

c) Improvement and customisation cookies

Club Med uses improvement and customisation cookies. These cookies are used to analyse, optimise and customise your browsing experience. Cookies are also used to allow targeted advertising and profiling as specified in Section 3.5. Cookies are only placed on your device with your prior express consent.

4.3 How do you disable/block cookies?

On your first visit on the Website, a Consent Management Platform will inform you on the different purposes of the Cookies, on the possibility to refuse cookies that need your prior consent. Your consent is saved for a period of 13 months.

By clicking on “Cookie preferences” within the Consent Management Platform, you may refuse cookies according to their different purposes.

You may change your browser settings to disable/block cookies. You may either accept all cookies or you can configure your browser to display a message when a server wants

to store a cookie. You may also disable all cookies. Note that if you disable all cookies, you may not be able to access parts of our Website or use some of our services.

5. How long does Club Med keep your Data?

As a general rule, your Data is kept only for the time necessary to carry out the operations for which the Data was collected.

Depending on the Data category, Club Med keeps the Data for the following time periods:

- Prospect Data is kept for a maximum of three years from the last contact they initiated with Club Med;
- Data relating to customers who have subscribed to a package are kept for a period of 3 years after the end of the contractual relationship with Club Med, which expires at the end of the "Grand Members" loyalty program (more information by clicking on the "Grand Members Program" link on the Club Med website);
- Bank details are not kept after payment of your package and/or services ordered, unless you have given your consent for them to be recorded or in the event of recurring payment, in which case they are kept for the duration of our contractual relationship;
- Data collected automatically via cookies, including browsing data, is kept for a maximum of 13 months;
- Data relating to your participation in solidarity projects identified by the Club Med Foundation is kept for a period of 3 years;
- Data relating to the identity documents you send us when exercising your right of access or rectification are kept for a maximum of 12 months;
- Data relating to an incident that has led to your inclusion on Club Med's incident list is kept until the payment incident has been resolved or, failing that, for a period of 5 years;
- Information enabling us to take into account the opposition rights of the persons concerned is kept for a maximum of three years starting from the exercise of this right.
- Data relating to WhatsApp conversations is kept for 1 year when used for statistical, quality analysis and follow-up purposes.
- Data relating to recordings of your calls (subject to your prior consent) and Data relating to the processing of your complaints are kept for a period of 1 year.

We may also delete your Data on request, following the instructions details in article 8.

Note that on the expiry of these periods, and on receipt of your request to delete, your Data may be archived in order to comply with statutory, accounting and tax obligations and/or during the applicable limitation period and/or for the duration of any legal dispute.

6. What categories of recipients receive your Data?

We may share your Data with various third parties including in particular:

- our affiliated entities to provide you with the requested services or acting as data processors in accordance with applicable laws;
- our commercial partners, suppliers and/or data processors who process your Data on our behalf, and according to our instructions, or as Controllers for the purposes specified in Section 3 (including in particular carriers, insurance companies, customs authorities, local service providers, financial institutions, technical data processors, etc.). We take special care to ensure that these third parties provide adequate guarantees to ensure the protection and security of your Data;
- duly authorised French or foreign authorities, particularly pursuant to legal proceedings or data transmission request.

7. What are the legal bases for the processing of your Data?

In accordance with the laws in force, we rely on various legal bases to process your Data, including:

- your prior express consent to the processing of your Data for one of the purposes listed in Section 3;
- the performance of the contract you entered into with us;
- the need to comply with a statutory obligation or to defend ourselves in the event of legal proceedings;
- the legitimate interests pursued by Club Med;

8. What are your rights?

8.1 Your rights of access, rectification, deletion and objection

You may ask us to access, rectify, update, restrict or delete your personal information.

You may also exercise your right to object to the processing of your personal Data.

8.2 The right to portability of your Data

The right to portability allows you to recover some of your personal Data, namely:

- Data you sent us directly as specified in Section 2.1;
- Data generated by your use of the Website as specified in Section 2;

We endeavour to respond to your request within a reasonable time and no later than the time limit provided by law.

8.3 The right to determine what happens to your Data

You have the right to set general or specific guidelines for the retention, deletion and disclosure of your Data after you close your account.

8.4 Contact

If you believe your rights have not been respected, you may, at any time, file a complaint with Club Med's Data Protection Officer (DPO) via mail to: dpo@clubmed.com

8.5. Right to form a complaint to the Data Protection Authority

You may also file your complaint with the competent regulatory authority.

9. Will your Data be transferred outside the European Union?

We may transfer your Data to countries outside the European Union for the sole purposes indicated in this Charter.

When your data is transferred, we ensure that your Data is protected in accordance with protection levels provided for in Europe.

Transfers are made exclusively to countries that are recognised as providing an adequate level of data protection by the European Commission.

Data may be transferred to a country that does not offer an adequate level of protection, especially if your Travel Package is taking place in such a country. In that case, Club Med and its partners or service providers agree to implement appropriate guarantees to govern the transfer (e.g. standard contract clauses of the European Commission), which you may request by sending a letter to the DPO as specified above.

10. The protection of your Data by Club Med

Club Med undertakes to guarantee the integrity and reliability of Data entrusted to it, including by taking all physical, organisational, and logistical measures necessary to prevent any alteration or destruction of such Data and by ensuring secure access only to those persons authorised to process the Data.

11. Amendments

Club Med may be required to amend this Charter in the event of a change in applicable laws. Amendments, if any, will be posted on this Website or will be communicated via mail.

Last updated on December 2023

Appendix: List of Cookies used by Club Med

Publisher: Google Analytics Premium (GAP)

Cookie name: _ga

Purpose: used to differentiate between the users of the website in the solution (take a random ID)

Cookie retention period: a maximum of 13 months

Publisher: DoubleClick

Cookie name: DoubleClick "ID" cookie

Purpose: allows DoubleClick to provide a better advertising level. They are used to offer targeted advertisements on web browsers' searches, to improve the reports on campaign performances and to avoid the re-broadcasting of advertisements which the web browser has already seen.

Cookie retention period: a maximum of 13 months

Publisher: AdmotTV

Purpose: used to identity users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: Google analytics

Cookie name: gat_cmTracker

Purpose: Google Analytics Statistics

Cookie retention period: a maximum of 13 months

Publisher: Tradelab

Cookie name: _tlc; _tls; _tlv

Purpose: used to display targeted advertising on third-party websites

Cookie retention period: a maximum of 13 months

Publisher: Criteo

Cookie name: uid, tc, nxtck_srv

Purpose: used to identify users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: Nextperformance

Cookie name: ccv2

Purpose: used to identify users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: Facebook

Cookie name: fr

Purpose: used to identify users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: Google AdWords

Purpose: used to identify users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: Bing

Purpose: used to identify users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: DoubleClick

Purpose: used to identify users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: Air360

Purpose: • Data processing based on consent: Measure content performance

• Data processing based on legitimate interest: Measure content performance

Cookie retention period: 25 months maximum

Publisher: The Trade Desk

Purpose: • Create a personalised ads profile

• Select personalised ads

• Store and/or access information on a device

• Use precise geolocation data

• Develop and improve products

• Measure ad performance

• Select basic ads

Cookie retention period: 25 months maximum

Publisher: Critizr

Purpose: Personalization and optimization of your navigation and our content

Cookie retention period: 25 months maximum

Publisher: Lightbox CDN (Digioh)

Purpose: • Store and/or access information on a device

Cookie retention period: 25 months maximum

Publisher: Pinterest

Purpose: • Apply market research to generate audience insights

• Create a personalised ads profile

• Create a personalised content profile

• Develop and improve products

• Measure ad performance

• Measure content performance

• Select basic ads

• Select personalised ads

• Select personalised content

• Store and/or access information on a device

Cookie retention period: 25 months maximum

Publisher: Smart Tribune

Purpose: • Audience measurement and performance monitoring of digital paths

• Personalization and optimization of your navigation and our content

Cookie retention period: 25 months maximum

Publisher: Teads

Purpose: • Apply market research to generate audience insights

• Create a personalised ads profile

- Develop and improve products
 - Measure ad performance
 - Select personalised ads
 - Store and/or access information on a device
 - Select basic ads
- Cookie retention period: 25 months maximum

Publisher: Trip Advisor

- Purpose: • Create a personalised ads profile
- Select personalised ads
 - Store and/or access information on a device
 - Apply market research to generate audience insights
 - Develop and improve products
 - Measure ad performance
 - Select basic ads
- Cookie retention period: 25 months maximum

Publisher: Whip

- Purpose: • Audience measurement and performance monitoring of digital paths
- Personalization of our ads on our partners' websites.
- Cookie retention period: 25 months maximum

Publisher: AB Tasty

- Purpose: • Data processing based on consent:
- Create a personalised content profile
 - Develop and improve products
 - Measure content performance
 - Select personalised content
 - Store and/or access information on a device
- Cookie retention period: 25 months maximum

Publisher: Quiq

- Purpose: • Store and/or access information on a device
- Apply market research to generate audience insights

- Develop and improve products
- Cookie retention period: 25 months maximum

Publisher: Tik Tok

- Purpose: • Apply market research to generate audience insights
- Create a personalised ads profile
 - Create a personalised content profile
 - Develop and improve products
 - Measure ad performance
 - Measure content performance
 - Select basic ads
 - Select personalised ads
 - Select personalised content
 - Store and/or access information on a device
- Cookie retention period: 25 months maximum