

Club Med Privacy Policy

Club Med, including Shanghai Club Med Holidays Travel Agency Co., Ltd. and its affiliated entities in and outside China (hereinafter, individually or collectively referred to as “Club Med” or “We”,), believes it is important to protect your personal data and ensures strict compliance with provisions relating to the protection of privacy and the processing of personal data, especially the Cybersecurity Law of the People's Republic of China (the “CSL”), and when applicable, the European Regulation on the Protection of natural persons with regard to the processing of personal data (EU Regulation 2016/679 of 26 April 2016).

The purpose of this Privacy Policy (hereinafter, the “**Policy**”) is to describe how and when Club Med, as a data controller, collects, uses and discloses certain personal data (hereinafter, the “Data”). We attach great importance to the security of your Data. Before providing us with your Data, please read this Policy carefully to learn about our privacy practices. If you have any questions regarding this Policy or related matters, you may contact us at any time (see Section 13 below).

This Policy will help you understand the following:

- 1. When does this Policy apply?*
- 2. What Data does Club Med collect?*
- 3. How does Club Med use the Data collected?*
- 4. What are the legal bases for the processing of your Data?*
- 5. What cookies does Club Med use?*
- 6. How long does Club Med keep your Data?*
- 7. How does Club Med share, transfer, and publicly disclose your Data?*
- 8. The protection of your Data by Club Med*
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1. When does this Policy apply?

This Policy 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 and ensure that they are aware of and accept this Policy. You may forward the hyperlink of this “Club Med Privacy Policy” to those for whom you book a holiday package.

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 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.

3. How does Club Med use the Data collected?

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

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 other about how the contract you enter into with us is performed (information on your journey, any transport delays, extra services proposed, etc.).

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, access to which is restricted to authenticated persons.

3.4 Sending you our Club Med newsletter and customised content

If, on booking a holiday package, setting up your account on the Website or thereafter, you ticked the box or filled in the form to receive the Club Med 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 Policy or security measures.

To stop receiving commercial offers and communications from the Club Med Group, you may at any time unsubscribe by (i) clicking on the unsubscribe link or completing the

objection process indicated in Club Med communications or (ii) contacting us (see Section 13 below).

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.

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 13 below).

3.6 Optimising the Website and our services

We use your Data to carry out analyses, technical tests (including 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 Policy;
- 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 may 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 Club Med products and commercial offers) and customised content.

We will ask for your consent before using your Data for a purpose that isn't covered in this Privacy Policy or using the Data collected for a specific purpose for other purposes.

We may collect and use your Data, without the need to obtain the consent from you, under any of the following circumstances:

- where the collection and use are in direct relation to State security or national defence security;
- where the collection and use are in direct relation to the public security, public sanitation, or major public benefits;
- where the collection and use are in direct relation to investigations into crimes, prosecutions, court trials, execution of rulings, etc.;
- where the collection and use are for the sake of safeguarding significant legal rights and interests, such as the life and property, of you or other individuals, but it is difficult to obtain their consent;
- where the Data collected is the data voluntarily published by you before the general public;
- where the Data is collected from information that has been legally and publicly disclosed, such as legal news reports and information published by the government;
- where the collection and use are necessary for ensuring the safe and stable operation of our services, such as identifying and disposing of faults in our services;
- other circumstances specified by laws and regulations.

4. 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;
- the safeguarding of your vital interests.

5. What cookies does Club Med use?

5.1 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.

5.2 What cookies does Club Med use?

Club Med uses the cookies listed in the appendix to the Policy.

a) Cookies needed to provide the services requested

Club Med may have to use those 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;
- user interface customization cookies;
- analytic (or statistical) cookies.

Data collected from statistical cookies is not cross-checked with other data processed (or 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.

You may block the placement of cookies, particularly statistical cookies (see “Disable cookies”).

b) Improvement and customisation cookies

Certain cookies are used to analyse, optimise and customise your browsing experience. Cookies are also used to automatically process your Data in accordance with the terms and

conditions specified in Section 3.4. Cookies are only placed on your device with your prior express consent.

When you browse the Website, third-party cookies (set by a communications agency, measurement company, targeted advertising service provider, etc.) may enable these third parties, during the cookie's lifespan, (i) to collect browsing information about our Website users and (ii) to post advertising content based on your interests. The setting and use of third-party cookies are subject to the cookie management policies of these third parties.

5.3 How do you disable/block cookies?

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.

To disable cookies, follow the instructions provided in the appendix.

6. 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:

- Data directly sent to us as specified in Section 2.1 is kept for the time necessary to process the Data;
- Browsing Data is kept for a maximum of 13 months;
- Prospect Data is kept for a maximum of three years from the last contact you initiated with Club Med;
- Data relating to identity documents sent to us to exercise your right to access or rectify the Data is kept for a maximum of 12 months;
- Information provided to process a data subject's exercise of its right to object to the receipt of electronic marketing is kept for a maximum of three years from the exercise of this right.

7. How does Club Med share, transfer, and publicly disclose your Data?

7.1 Share

Generally, we do not share your Data with companies, organizations, or individuals outside of Club Med except in the following cases:

- We'll share your Data outside of Club Med when we have your consent. We'll ask for your explicit consent to share any sensitive personal information;
- We may share your Data in accordance with laws and regulations, or the mandatory requirements of the competent government authorities;
- We'll share your Data with our affiliates. However, we only share it on a need-to-know basis and will be bound by the purposes stated in the Policy and by applicable regulations. If our affiliates are to change the intended purposes for which they use your Data, they will seek your consent again;
- We may share your Data with our commercial partners, suppliers and/or data processors (including in particular carriers, insurance companies, customs authorities, local service providers, financial institutions, technical data processors, etc.) to ensure the smooth completion of our services. 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. However, we will only share your Data for legitimate, justified, necessary, specific, and explicit purposes, and will only share the Data necessary to provide the service. Our partners have no right to use the shared Data for any other purposes;
- We will enter into strict non-disclosure agreements with all companies, organizations and individuals with which we share your Data, requiring them to process your Data according to our instructions, this Policy and any other related confidentiality and security measures;

7.2 Transfer

We will not transfer your Data to any company, organization or individual, except in the following cases:

- We'll transfer your Data to other parties when we have your express consent;
- When it comes to mergers, acquisitions or bankruptcy liquidations, if it involves the transfer of Data, we will require the new company or organization which hold your Data to be bound by this Policy, otherwise we will require the company or organization to obtain your consent again.

7.3 Disclosure

We will make available your Data to the public only under the following conditions:

- With your express consent;
- With legal reasons: we may publicly disclose your Data if it's required by law, legal processes, litigation or the competent government authorities.

8. The protection of your Data by Club Med

Club Med makes its best reasonable efforts to protect your Data, including by taking reasonable physical, organisational and logistical measures necessary to prevent the disclosure, destruction or missing of such Data and by ensuring secure access only to those persons authorised to process the Data. However, no method of transmission over the Internet or method of electronic storage is 100% secure and thus we cannot guarantee its absolute security.

9. What are your rights?

We attach great importance to your concern for Data and makes every effort to protect your right to access, correct, delete, and withdraw consent to use, your Data, so that you have full capacity to protect your privacy and security. These rights are set out below.

9.1 The right to access and correct your Data

Unless provided by laws and regulations, you have the right to access to and correct your Data at any time.

9.2 The right to delete your Data

Under any of the following circumstances, you may request us to delete your Data:

- When our processing of Data violates laws or regulations;
- When we collect or use your Data without your consent;
- When our processing of Data violates our agreement with you;
- When you no longer use our services, or cancel your user account; or
- When we no longer provide you with any services.

9.3 Responding to your requests

If you would like to access, correct or delete your Data, or if you believe that there is any violation of laws and regulations or any agreement with you regarding the collection or use of Data, you can send an email to CustomerCare.CN@clubmed.com. For the sake of security, you may be required to file written requests or prove your identification in other ways. We will respond to your request within reasonable time. We may reject those requests that are duplicative, require excessive technical means, pose risks to the legitimate rights and interests of others, or are fairly unrealistic.

Please note that we may need to retain certain Data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or reservation, you may not be able to change or delete the Data provided until after the completion of such purchase or reservation). There may also be residual Data that will remain within our databases and other records, which will not be

removed. In addition, there may be certain data that we may not allow you to review for legal, security or other reasons.

10. How does Club Med protect children' Data?

If you are a child, we suggest you ask your parents or guardians to read this Policy carefully and use our services or provide us with the Data, with the consent of your parents or guardians.

For the Data of child collected with the consent of parents, we will only use or publicly disclose it when permitted by laws, explicitly consented by the parent or guardian or required for protecting the child.

We treat anyone under the age of 14 as a child.

11. Will your Data be transferred outside China?

As we provide services through resources and servers around the world, this means that, with your consent, your Data may be transferred to or accessed by Club Med SAS, a company duly incorporated in accordance with the laws of France and once collected, your Data will be stored on the servers of our service provider which is IBM located in France. But we will ensure that your Data is protected in accordance with local regulations and especially the EU Regulation 2016/679 of 26 April 2016 which provides protection levels at least to those provided for in China.

12. Notice of Change

This Policy may be amended and updated from time to time, consistent with the requirements of the applicable laws and regulations regarding data protection. But we will not reduce your rights under this Policy without your express consent. We will issue the amended or updated version of the Privacy Policy on our website for you to get aware of the latest Privacy Policy. We will also notify you of the changes in the Policy through pop-up windows when you log in our website, push notifications when you use our services, email or in other appropriate ways.

13. Contact

If you have any questions or comments about this Policy, or if you would like to correct, amend, or delete the Data that we may maintain about you, please contact us by send a letter to Room 701-704, S1, No.600 Zhongshan East 2nd Road, Huangpu District, Shanghai, Customer Relationship Management Department.

Last updated on 30 September 2018

Appendix:

List of Cookies used by Club Med

Club Med regularly updates this list. This list was last updated on 21 May 2018

Publisher: Adobe Analytics

Cookie name/purpose:

Cmclid / C_m: identify where a visitor is from when he comes to the Website

s_cc: know if the settings of the web browser's browser can or cannot support the enabling of cookies

s_sq: know what the previous page visited was

s_vi: identify the paths on the Website

iccm: recognise the visitor on the whole of our Website

Cookie retention period: a maximum of 13 months

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: Neolane

Cookie name: neolaneID

Purpose: used to identify prospects and customers in the Club Med database? browsing on the Website (takes their ID in database)

Cookie retention period: a maximum of 13 months

Publisher: Kameleoon

Cookie name: kameleoonVisitIdentifier / kameleoonSessionId

Purpose: test the new functionalities of the Website

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 identify users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: Freespee

Cookie name: __fs_dncs_exttrack

Purpose: Freespee tracking information

Cookie retention period: a maximum of 13 months

Publisher: Freespee
Cookie name: __fs_dncs_sessionid
Purpose: Freespee tracking information
Cookie retention period: a maximum of 13 months

Publisher: Freespee
Cookie name: __fs_dncs_trackingid
Purpose: Freespee tracking information
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: Adobe
Purpose: used to identify users browsing the website
Cookie retention period: a maximum of 13 months

Publisher: Ligatus
Purpose: used to identify users browsing the website
Cookie retention period: a maximum of 13 months

Publisher: Gemini
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: Lengow

Purpose: used to identify users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: Quantum

Purpose: used to identify users browsing the website

Cookie retention period: a maximum of 13 months

Publisher: Spin

Purpose: used to identify users browsing the website

Cookie retention period: a maximum of 13 months

HOW ARE COOKIES DISABLED?

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.

To disable cookies:

>> If you use Internet Explorer 8 and following:

1. Go to “Tools” in the menu bar and click on “Internet Options”
2. Click on the tab “Non-disclosure” on top
3. Slide the cursor up to the setting “Block all cookies” to block all cookies or slide down to the setting “Accept all cookies” to accept all cookies.

For further information, consult <http://windows.microsoft.com/fr-fr/internet-explorer/delete-manage-cookies>

>> If you use Firefox 30.0 and following:

1. Click on the button “menu” and select “Options”
2. Select the panel “Privacy”.
3. In the history area, for the option “Retention rules”, select “use customised settings for the history”.
4. Tick the space “Accept the cookies” to activate the cookies or untick it to disable it.

If you have problems with the cookies, ensure that the option “Accept third party cookies” is not positioned on Never.

5. Choose how long the cookies may be retained.

Retain them until: “Their expiry”: Each cookie will be deleted on its expiry date, date set by the website issuing the cookie.

Retain them until: “Closing of Firefox”: cookies enabled on your computer will be deleted when you close Firefox.

Retain them until: “Ask me each time”: a warning shows each time a website wishes to send a cookie, asking you if you agree to enable the cookie or not.

6. Click OK to close the “Options” window

For more information, consult <https://support.mozilla.org/fr/products/firefox/privacy-and-security/cookies>

>> If you use Google Chrome:

1. Go to the menu “Tools”
1. Click on “Settings”
2. Click on “Advanced settings”
3. Click on “Non-disclosure/Content settings”
4. “Cookies” must be selected. Then select “Block cookies and third party website data”

For more information, consult <https://support.google.com/chrome/answer/95647?hl=fr>

>> If you use Safari 5.0:

1. Choose Safari > Preferences and click on “Security”.
2. In the section “Accept cookies”, specify if and when Safari must accept cookies of websites. For an explanation on options, click on the help button (looks like a question mark). If you have set Safari to block cookies, you should perhaps temporarily accept cookies to open a page. Repeat the above stages, by selecting “Always”. When you have finished with the page, disable the cookies again and delete cookies from the page.

For more information, visit http://support.apple.com/kb/ht1677?viewlocale=fr_FR

If you have a different browser type or version, see your browser’s “Help” menu.