

GIE ATOUT FRANCE

INFORMATION NOTICE FOR PARTNERS, CUSTOMERS OR PROSPECTS

The following information is given to you so that you are aware of Atout France's commitments to personal data protection.

It also explains your rights and the conditions under which your personal data are collected, processed, stored and archived.

Atout France processes personal data (hereafter the "processing") within your contractual relationship or with your prior consent.

The categories of personal data which are processed by Atout France are mainly collected within the scope of Atout France's missions and to promote the French tourism offer across all regions. This covers the following categories of personal data:

- **General personal data**
E.g.: Identification data such as your personal details, or contact details, etc.;
- **Login data**
E.g.: email address, operation cookies, etc.;
- **Professional data**
E.g.: position held.

If you are a partner, prospect or customer of Atout France, this information notice is intended to inform you of your rights and how your personal data will be used.

You acknowledge that this information notice informs you of the purposes, legal framework, interests, recipients or categories of recipients with whom your personal data are shared, and of the possibility of your data being transferred to a third country.

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1. Introduction

Atout France has brought itself into line with the EU Personal Data Protection Regulation. Our personal data protection policy is now compliant with these rules, and we are therefore informing you of our personal data protection policy in this information notice.

Atout France is the controller for the processing operations described below which it performs on your personal data.

2. The content of the Information Notice

2.1 Who are we?

2.1.1 Controller

The following information is given to you so that you are aware of the commitments to personal data protection made by Atout France, whose registered office is at 200/216 Rue Raymond Losserand - CS 60043 - 75680 Paris Cedex 14 - France, and which is the controller for processing the personal data covered by this document.

The Controller within the meaning of the General Data Protection Directive undertakes to protect personal data and to keep them confidential.

2.1.2 Our Data Protection Officer

Atout France has appointed CGI France as its Data Protection Officer, and its contact details are as follows: dpo@atout-france.fr

2.1.3 The personal data we process

When processing personal data for the purposes indicated hereafter, Atout France collects and processes the following data:

- identification data (e.g. surname, first name, address, business contacts, etc.)
- login data (e.g. email address, operation and analysis cookies, etc.)
- sensitive data (e.g. information on any intolerance in relation to event organisation).

2.2 The purposes and the legal basis for our data processing

2.2.1 The purposes and grounds for the processing operations we carry out

The processing we undertake is for the following purposes and on the following grounds:

- Registering travel and holiday operators and keeping the public register of travel and holiday operators.
- Classifying commercial tourist accommodation and keeping the public register of classified accommodation.

- Awarding Palace distinction and Vignobles & Découvertes label, which the State has entrusted the management of to Atout France.
- Reviewing applications for the Destination d'Excellence and Tourism et Handicap labels.
- Using an API (Application Programming Interface) to populate the site, so that the general public can identify establishments that have been awarded quality labels.
- Updating the pages of the Atout France website dedicated to the Destination d'Excellence and Tourisme et Handicap labels.
- Ad hoc gathering of statistics to analyse the deployment of the Destination d'Excellence and Tourisme et Handicap labels.
- Organizing events.
- Conducting surveys.
- Organizing competitions.
- Organizing training courses.
- Managing professional contact files.
- Managing members and prospects' files.
- Implementing promotion and communication campaigns.
- Conducting research.

2.2.2 The legitimate interests pursued

The legitimate interests pursued by Atout France can notably involve:

- Promotional and communication campaigns for France as a destination in order to perform the public-interest missions entrusted to Atout France as best as possible.
- Qualitative and quantitative surveys.
- Qualifying member data.
- Organizing and following up events
- Surveys.
- Managing operation and analysis cookies of Atout France's websites.

2.2.3 The recipients of your data

The personal data we collect, as well as the data which are gathered subsequently, are intended to be used by us in our capacity as controller.

We ensure that only empowered and authorised persons have access to these data. Our service providers can be recipients of these data in order to perform the services which we entrust to them. Some personal data may be sent to third parties or legally empowered bodies (e.g. government departments, statutory auditors) in order to comply with our legal, regulatory or contractual obligations.

Atout France has offices worldwide to perform its tasks. Atout France Paris is responsible for these offices and subsidiary.

Your personal data may be aggregated, pooled or shared between all Atout France offices and its subsidiary.

Your personal data can be disclosed to these offices and subsidiary for the purposes indicated in

this information notice. These operations are conducted in accordance with legal instruments which comply with the applicable regulations, and which ensure that your rights are protected and complied with.

2.3 Transfers of your data

We transfer your personal data to Atout France's offices which are located in the following countries: Atout France website – International Network: <http://www.atout-france.fr/notre-reseau>

Atout France shall transfer your personal data to a third country or to an international organization which are the subject of an adequacy decision issued by the European Commission. If no such decision has been issued, the data will only be transferred providing appropriate safeguards have been set up. You will always have enforceable rights and effective remedies, in line with current regulations.

2.4 The periods of time we store your data

The periods of time we store your personal data are proportionate to the purposes for which they are collected. Our data storage policy is therefore organised as follows:

Atout France undertakes to store personal data according to legal requirements. Due to the international scope of Atout France's activities, it processes the personal data of residents from different countries. Therefore, Atout France has drawn up its storage rules in accordance with the most restrictive regulations in all these countries in order to protect the rights of all data subjects.

These indications are supplemented by the attached guidelines.

2.5 Your rights

2.5.1 The different ways you can exercise your rights

You can exercise your rights by e-mail to the following address: contact.rgpd@atout-france.fr by proving your identity.

You must clearly state your surname(s) and first name(s), and the address where you would like the application form for exercising your rights to be sent. Atout France will be able to reply to your request once it has received your completed, dated and signed form, together with a photocopy of an identity document with your signature. The form can also be sent by post to Atout France- Service Juridique – 200/216 Rue Raymond Losserand - CS 60043 - 75680 Paris Cedex 14 - France.

As a general rule, you can exercise all your rights free of charge. However, regarding your rights

of access, you may be asked to pay a reasonable fee based on the administrative costs for any data copies you may request.

Regarding your rights of information, Atout France will not be obliged to respond to requests for information if you already have the information you are requesting.

Atout France will inform you if it cannot act on your requests.

Atout France points out that the non-disclosure or modification of your data may impact the processing of certain requests when carrying out contractual relations and that your request to exercise your rights will be kept for monitoring purposes. All your rights are detailed in the next article (2.7.2).

2.5.2 Your right of information

You acknowledge that this information notice informs you of the purposes, legal framework, interests, recipients or categories of recipients with whom your personal data are shared, and about the possibility of your data being transferred to a third country or an international

Besides this information, you declare that, in order to guarantee fair and transparent processing of your data, you have received additional information concerning:

- The period that your personal data are stored.
- The existence of your rights and how to exercise them.

If we decide to process data for different purposes than those indicated, you will be informed of all information relating to these new purposes.

2.5.3 Your right of access to and rectification of your data

You have the right to access to your personal data and to have your personal data rectified. You can exercise these rights by contacting Atout France at the following address: contact.rgpd@atout-france.fr.

As such, you have the confirmation on whether your personal data are being processed and, if they are, you can access your data as well as the information concerning:

- The purposes of the processing.
- The categories of personal data concerned.
- The recipients or categories of recipients and the international organizations to which the personal data have been or will be disclosed, in particular recipients in third countries.
- Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period.
- The existence of the right to request from the controller rectification or erasure of your personal data or restriction of processing of your personal data or to object to such processing.
- The right to lodge a complaint with a supervisory authority.

- Information as to the source of the data when they are not collected directly from the data subjects.
- The existence of automated decision-making, including profiling, and in this case, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for data subjects.

You may ask us to rectify or complete your personal data if they are inaccurate, incomplete, ambiguous or out of date.

2.5.4 Your right to erasure of your data

You can ask us to erase your personal data when one of the following grounds applies:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- You withdraw the consent you gave previously.
- You object to the processing of your personal data when there is no legal ground for such processing.
- The personal data processing does not comply with applicable laws and regulations.
- Your personal data have been collected in relation to the offer of information society services to children under 16 years of age.

However, this right may not be exercised if the storage of your personal data is required by law or regulation, for example for the establishment, exercise or defence of legal claims.

2.5.5 Your right to restriction of data processing

You can request the restriction of the processing of your personal data in the cases specified by law and the regulations.

2.5.6 Your right to object to data processing

You have the right to object to the processing of your personal data when the processing is based on the legitimate interest of the data controller or when the processing is necessary for the performance of an assignment in the public interest or relating to the exercise of public authorities.

2.5.7 Your right to data portability

You have a right to portability concerning your data. The data for which this right can be exercised are:

- Your personal data, exclusively, excluding anonymized data or data that does not concern you.
- The personal declaration data and the personal operation data mentioned above.
- Personal data that does not infringe the rights and freedoms of third parties, such as rights protected by business secrecy.

This right is restricted to processing based on consent or a contract as well as to personal data that you have personally generated.

This right does not cover derived data or inferred data, which are personal data created by Atout France.

2.5.8 Your right to withdraw your consent

When the data processing we perform is based on your consent, you can withdraw it at any time. We will then stop processing your personal data, without this affecting any previous operations you consented to.

2.5.9 Your right to lodge a complaint

You have the right to lodge a complaint with the CNIL (the French Personal Data Protection Authority) in the French territory, without prejudice to any other administrative or judicial remedy.

If you are a national from a country in which Atout France offices are located outside France, you have the right to lodge a complaint with your national data protection authority.

2.5.10 Your right to give post-mortem instructions

If you are a French national, you are entitled to give instructions concerning the storage, erasure and disclosure of your personal data after your death to a trusted, certified third party which is responsible for ensuring that the deceased's wishes are complied with, in accordance with the requirements of the applicable legal framework.

2.6 Why are your data disclosed to us?

The personal data of private individuals or professional people who have expressed an interest in France as a destination are disclosed to us within the scope of the public interest missions entrusted to Atout France by the French State pursuant to the law no 2009-888 of 22 July 2009 on the development and modernisation of tourism services.

Atout France has three main missions: to promote France as a tourist destination in France and abroad, to perform tourist engineering operations and to contribute to the competitiveness and quality policy of tourist companies and destinations. Atout France is responsible for monitoring the quality of the tourism offer through a number of measures: classification of tourist accommodation, the Palace distinction, registration of travel operators, the Vignobles & Découvertes label, Destination d'Excellence & Tourisme et Handicap labels.

Appendix - Guidelines for the storage of personal data of partners, customers or prospects

Category	Category of processing or macro purpose (within the scope of Atout France's global activities)	Period of storage by Atout France	What category of person?
Surveys	Quantitative surveys	The period of time required to achieve the purpose of the survey or until the right to object is exercised or consent is withdrawn	All
Surveys	Qualitative surveys	The period of time required to achieve the purpose of the fact finding or until the right to object is exercised or consent is withdrawn	All
Events	Marketing	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
Events	Press event	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
Pro contact files	Catalogue - Pro contact file	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
Statistics files	Web analysis	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
Cookies	Operation and analysis cookies	13 months	All

Training courses	Management of training courses	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	Customers
Management of Destination d'Excellence & Tourisme et Handicap labels	Management of application files	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
Management of Destination d'Excellence & Tourisme et Handicap labels	Management of the website to help the general public identify approved establishments	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
Management of Destination d'Excellence & Tourisme et Handicap labels	Compiling statistics	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
Management of Destination d'Excellence & Tourisme et Handicap labels	Carrying out surveys	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
File management: future members' customer	Competition	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
File management: future members' customer	Competition marketing	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
File management: future members' customer	Emailing	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All

Prospects file management	Management of applications to Atout France	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
Sales	Online shop	Until consent is withdrawn or 3 years after the last contact of the people with the organization.	All
Group tourist accommodation	Classifying and keeping the public register of classified accommodation	Duration of the public service mission	All
Travel and holiday operators	Registering and keeping the public register of travel operators	Duration of the public service mission	All
Palace distinction and Vignobles & Découvertes label	Reviewing application files	Duration of the public service mission	All