



POLICY ON THE USE OF PERSONAL DATA

This policy on the use of personal data has been produced in compliance with the provisions of Act n°78-17 of 6 January 1978 on Information, Data Files and Civil Liberties (the French Data Protection Act) and the General Data Protection Regulation n°2016/679 (GDPR).

It sets out the internal policy for the use of personal data for administrative purposes adopted by Brides les Bains Tourist Office in the role of data processing manager.

Identity of the data processing manager

Brides les Bains Tourist Office, EPIC, with registered offices at Place de centenaire BP 28, 73572 Brides les Bains Cedex, France, registered in Chambéry under SIRET n° 51995858100018, with Bénédicte Breuls acting a legal representative.

Register of processing operations

The data processing manager is not required to keep a register of processing operations.

Persons concerned by the data processing

The persons concerned (subsequently referred to as "Persons Concerned") by data processing are:

- Pass Equili'Brides customers
- Participants of events organised by the Office
- Users of the Office's website
- accommodation providers who are partners of the Office
- accommodation providers who are not partners of the Office
- partners (other than accommodation providers) of the Office
- suppliers to the Office
- Persons who make a request for documents (type : brochure, etc.) or pieces of information

Categories of data processed

The data processing manager processes the following categories of data:

- Data relating to the identity of the Person Concerned
- Data relating to family, residential, economic and financial status
- Login data and IP addresses
- Data relating to payment methods

Origin of data collection:

Personal data is collected by the data processing manager when the Person Concerned: - registers for the Pass Equili'Brides (data of customers, partner and non-partner accommodation providers)

- registers for an event organised by the Office (for the participants)
- logs on to the Office website (website users)
- completes the contact form (website users)
- enters into a business relationship or partnership with the Office

Purpose and legal bases of data processing

The data processing manager collects personal data from the Persons Concerned on the following legal basis or bases:

- Management of Pass Equili'Brides orders (order management, performance of services, invoices and payments): the performance of contracts
- Keeping of accounts: fulfilling a legal obligation
- Managing complaints: fulfilling contracts
- Creating and managing events: legitimate interest
- Carrying out marketing initiatives: consent for non-customers — legitimate interest for existing and former customers
- Selection of suppliers: legitimate interest
- Managing a list of persons who have refused personal data processing: a legal obligation
- Tracking and monitoring Internet activity: consent
- Sending customer and accommodation provider files to Brides les Bains town hall for the latter to receive payment of the tourist tax: legitimate interest
- Responding to people's requests for documents (brochure, etc.) and pieces of information: fulfilling contracts

Purpose of data processing and retention periods

Personal data is collected by the processing manager for established, explicit and legitimate purposes. After processing, personal data is kept for a period of time no longer than that required for the purposes for which it was stored.

The data processing manager collects the personal data of Persons Concerned for the following periods:

- Contract management: the duration of the contract
- Keeping of accounts: 10 years
- Complaints management: according to the requirements of the complaints procedure
- Creation and management of events: the time required for managing the event
- Carrying out marketing initiatives: 3 years
- Selection of suppliers: according to the requirements of the complaints procedure
- Managing a list of persons who have refused personal data processing: 3 years
- Tracking and monitoring Internet activity: 13 months
- Sending data to Recipients: the period required by the transmission procedure

Recipients of the data

After collection, personal data is only for use by the data processing manager. Depending on the circumstances, the data processing manager can send certain data to third party recipients, with the prior consent of the Persons Concerned if necessary.

Customers of the Tourist Office are informed and accept that their data (identification and accommodation data in the Municipality) collected on purchase of the Pass Equili'Brides is passed on to the Brides les Bains town hall for the latter to receive payment of the tourist tax from service providers in the Municipality offering accommodation (by cross-referencing information already held by the Municipality).

Partner and non-partner accommodation providers are informed and accept that their data (identification data and data about their tenants) collected on purchase of the Pass Equili'Brides is passed on to the Mairie of Brides les Bains for the latter to receive payment of the tourist tax from service providers in the Municipality offering accommodation (by cross-referencing information already held by the Municipality).

Furthermore, persons who have registered for events organised by Brides les Bains Tourist Office are informed and accept that their identification data may be passed on to partners of these events so that the latter can monitor and manage lists of those who have registered.

The Authorised Recipients undertake to use such data for this and no other purpose.

Sub-contractors

The Persons Concerned are informed and accept that the data processing manager involves sub-contractors in processing their personal data.

The data processing manager has concluded a written contract with each of its sub-contractors in compliance with the requirements of the French Data Protection Act and the GDPR.

Sub-contractors act solely on the instructions of the data processing manager and undertake to provide the same guarantees for personal data protection. Sub-contractors employ the appropriate technical and organisational measures for ensuring that data processing complies with legal and regulatory requirements.

The data processing manager undertakes to involve only those sub-contractors who:

–are based in a country of the European Union or

–are based in a country showing a level of protection deemed to be appropriate in the opinion of European data protection authorities or

–provide the appropriate guarantees in application of article 46 of the GDPR.

Failing that, data may only be transferred in adherence to article 49 of the GRPR.

The list of sub-contractors will be made available to the Persons Concerned on written request. The data processing manager undertakes to inform each Person Concerned of any addition of or change to a sub-contractor by email as soon as possible if such a change has a negative impact on the processing of their data.

The Person Concerned is required to make any observation or objection in writing within fifteen days of receipt of such information. If no response is given within this time, the Person Concerned acknowledges that they have approved the sub-contractor in question. The data processing manager will provide the Person Concerned with all the necessary information enabling them to determine the compliance of the sub-contractor with the regulatory requirements.

Transmission of data outside the European Union

The data processing manager is required to transmit certain data outside the European Union.

The data processing manager undertakes to ensure that data is only transmitted to countries showing a level of protection deemed to be appropriate in the opinion of European data protection authorities or, failing that, to provide the appropriate guarantees in application of article 46 of the GDPR.

Failing that, data may only be transferred in adherence to article 49 of the GRPR.

At any event, the Persons Concerned enjoy enforceable rights and effective legal remedies in the matter.

Security measures

The data processing manager employs the appropriate technical and organisational measures for ensuring a level of security suitable for the risk.

The data processing manager employs measures for ensuring that any natural person acting under the authority of the processing manager or that of the sub-contractor and having access to personal data does not handle it unless instructed by the processing manager or unless obliged to do so.

What happens to personal data on the death of an individual – Right of access, rectification, deletion and portability with regard to data

Any Person Concerned by processing may provide instructions for the retention, deletion and communication of their data after their death. These instructions may be general or specific. A Person Concerned by processing also has the right of access, refusal, rectification, deletion and, in certain situations, portability with regard to their personal data. The Person Concerned has the right to withdraw their consent at any time if consent forms the legal basis of data processing.

The request must contain the last name, first name and email or postal address of the Person Concerned and must be signed and accompanied by valid proof of ID.

The Person Concerned may exercise their rights by writing to: Pauline Martin - pauline.martin@brides-les-bains.com

Complaints

Any Person Concerned by the processing of personal data has the right to make a complaint to the supervisory authority (CNIL).

Cookies policy

A cookie is a small text file (tracer) that is located or stored on the user's device (PC, tablet or mobile device) when they visit the website. The cookie enables the website to recognise them, help them move between website pages and provide them with secure connections and remembers their preferences for future visits.

These cookies can also be used for advertising purposes, audience measurement and sharing on social media.

The data processing manager uses the following cookies requiring the consent of the Person Concerned:

- Cookies used for advertising purposes
- Cookies for social media for promoting the website through shares
- Cookies for audience measurement
- Cookies for sharing videos for increasing visibility

If an Internet user has not given their consent, such cookies are not placed or read.

When an Internet user accesses the website, an information and consent request banner appears.

The banner remains if the user does not continue with navigation i.e. while they have not moved to another page on the website or clicked on a feature of the website (image, link, "search" button).

The information banner can refer the user to options for refusing cookies requiring consent.

Brides les Bains Tourist Office

Bénédicte Breuls (signature)