

Privacy, security and data protection charter

Applicable from 29/04/2021

Acceptance of the General Terms and Conditions of Use (GTCU) and this Charter.

By using the Platform, the User acknowledges and accepts the General Terms and Conditions of Use (GTCU) and this Privacy, Security and Data Protection Charter.

If the User does not approve the General Terms and Conditions of Use or this Privacy, Security and Data Protection Charter, the User is requested to cease all use of the Platform and to contact EUROP ASSISTANCE FRANCE at protectiondesdonnees@europ-assistance.fr so that it can delete any personal data concerning him/her that has been collected.

Capitalised terms shall have the meaning indicated in the GTCU, whether in the singular or the plural, depending on the context of their use.

1) Data Protection

Data Controller

The Platform is published and operated by EUROP ASSISTANCE FRANCE, a simplified joint stock company with share capital of €5,316,384 whose registered office is at 1 promenade de la Bonnette, 92230 Gennevilliers. Registered on the Nanterre Trade and Companies Register under number 403 147 903.

EUROP ASSISTANCE FRANCE (hereinafter “the Company”) acts as data controller within the meaning of the law of 6 January 1978, as amended in 2018, known as the “Data Protection Act”, and the European Data Protection Regulation no. 2016/679 of 27 April 2016 known as the “GDPR”.

The Company has drawn up this Privacy, Security and Data Protection Charter to express its commitment to guarantee the confidentiality and security of the information shared by the User with it.

This document and its General Terms and Conditions of Use (GTCU) set out how, and the purposes for which it collects and uses the personal data of the Platform Users.

Legal basis

The collection of personal data of Platform Users by the Company through the Platform has as its legal basis the performance of a contract (in this case the provision of Services on the Platform).

Data Collected

The Company may collect and process personal data, in particular of a sensitive nature, concerning the User when interacting on the Platform and using the Services, which may include the following information provided by the User by filling in forms or saving documents on the Platform:

- ✓ the User’s policy number;
- ✓ the name of the Club Med Village;
- ✓ the User’s first name;
- ✓ the User’s business email address;
- ✓ telephone number (optional)

Data is collected so that interested and consenting Users can benefit from the Services. The User's personal data transmitted via the Platform includes his/her administrative data.

The Company collects data only to the extent that it is necessary and essential to perform the various Services delivered in connection with the use of the Platform, and for all other purposes set out in this Privacy Policy.

Users are informed that their administrative data that are collected and transmitted via the Platform are necessary for the use and performance of the Services. Failing this, the User may not create his/her User Area and benefit from the Services of the Platform. Users are informed that their health data collected and transmitted via the Platform are necessary for the use and performance of the Services, to which they expressly agree.

The Company may share certain information concerning the User with other persons, as described below:

✓ Employees of the Company: are granted access to the User's personal data collected on the Platform, the Company's employees who need it for their role related to the activity of the website, under an authorisation policy to limit access to data, depending on the categories of data and the employees' tasks.

✓ Third-party service providers: the Company employs other companies and persons to perform work on its behalf. In these cases, the Company provides them only with the information they need to carry out their mission.

With the exception of these aforementioned uses, the Company shall not transmit the User's personal data to a third party without its consent.

However, Users are informed that the Company may freely exploit data that they have sent in connection with their use of the Services, once these have been anonymised, for the purposes of statistical studies.

Information about Users is an important part of the Company's business and the Company does not sell or lease such information to third parties to enable them to send direct marketing communications to the User without the express agreement of the User.

Protection of the Company and third parties

The Company may only disclose the data if it is legally obliged to do so, or if this disclosure is necessary to perform and enforce its General Terms and Conditions of Use or any other agreement concluded with the User, or to protect the rights of the Company.

How are User Data used?

The information provided by the User in connection with the use of the Services shall be used mainly to provide him/her with the Services of the Platform. Thus, a User's data can be used to:

- ✓ provide him/her with the Services;
- ✓ personalise his/her visit to the Platform;
- ✓ check that the content of the Platform is the most effective method for him/her and his computer;
- ✓ inform him/her of content that the Company thinks will be of interest;
- ✓ contact him/her and send him/her information concerning the Services and any changes he/she makes to the Services;
- ✓ send emails relating to various issues and interactions relating to the use of the Services;
- ✓ contact him if the Company needs to resolve issues relating to technical support for the Platform;
- ✓ provide the Company with information enabling it to develop new functionalities and new Services;
- ✓ manage his/her User Area.

Data Storage

In accordance with the French Data Protection Act of 6 January 1978, as amended, and the GDPR, the user's Data is only kept by the Company for the time strictly necessary to achieve the purposes set out above.

Data Protection Measures

Enhanced security measures are put in place to enable the collection and processing of Personal Data under conditions guaranteeing their confidentiality, integrity and, more generally, their security in compliance with the provisions of the French Data Protection Act of 6 January 1978, as amended, the GDPR and the applicable legal provisions.

It should be noted that user names and passwords are strictly personal and must remain confidential; the User therefore undertakes not to disclose them. Their use may not under any circumstances be transferred to a third party, for any reason whatsoever. The User is responsible for their safekeeping and undertakes not to disclose or appropriate those of another user.

Data Subject Rights

Users have the right to access, rectify, delete and transfer the data concerning them. They also have the right to object to and limit the processing of its data. Users have the right to set guidelines governing how they intend these rights to be exercised after their death. They may exercise these rights (substantiated by identity documents) by contacting EUROP ASSISTANCE FRANCE at protectiondesdonnees@europ-assistance.fr or at the postal address below:

EUROP ASSISTANCE FRANCE – Délégué à la protection des données - 1 promenade de la Bonnette
92633 GENNEVILLIERS cedex.

Users acknowledge that they may object at any time to the processing of their personal data by requesting the closure of their User Area.

Users are informed that they have the right to appeal to the CNIL.

2) Cookies

When using the Platform, cookies generated by the Company's or its partners' IT servers may be installed automatically on the user's terminal subject to the choices expressed by them regarding cookies, which they may change at any time.

The purpose of these cookies is solely to enable or facilitate electronic communication and navigation on the Platform and are strictly necessary for the provision of the Services, and in particular to:

- ✓ measure the number of pages viewed, the number of visits and the activity of the User on the Platform;
- ✓ memorise information relating to forms completed by the User on the Platform (Registration or access to the User Area) or to Services implemented on the Platform;
- ✓ enable the User to access his/her User Area;
- ✓ implement security measures, for example when the User is asked to log back in to Content or a service after a certain period of time.

Cookies are stored by the Company for a maximum period of 13 months and the data collected through them are not transferred to third parties or used for other purposes.

The depositing of certain cookies on the User's device requires the User's consent. Other cookies are exempt from consent.

2.1. Summary table of cookies

Service providers	Cookie name	Purpose	Duration	Data Controller
Fair & Smart	cookieTAP	For obtaining visitor consent and the management of non-mandatory website cookies	180 days	Europ Assistance France
Google	SID, SAPISID, APISID, SSID, HSID, NID, ANID	Google has set a number of cookies on all pages with a Google map. Their purpose is to collect information to measure the number and behaviour of Google Maps users.	Maximum 2 years	Europ Assistance France
Google	CONSENT	This cookie is an extension of the cookie usage notification. It does not collect personal data.	2 years	Europ Assistance France
Google Advertising	1P_JAR	Google advertising cookie used for tracking users and targeted advertising	1 month	Europ Assistance France

Google Advertising	ANID, APISID, HSID, NID, OTZ, SAPSID, SID, SIDCC, SSID, DV, SEARCH_SA MESITE	Google uses these cookies based on recent searches, in order to improve its advertising service on its websites. These cookies retrieve statistical information about the number and behaviour of users visiting the website and their preferences.	Maximum 2 years	Europ France	Assistance
Google Advertising	__Secure-3PAPISID, __Secure-3PSID, __Secure-3PSIDCC, __Secure-APISID, __Secure-HSID, __Secure-SSID	Cookie used for targeted advertising	Maximum 12 months	Europ France	Assistance
Google Analytics	_utmb	Manages the data of a user's current visit. Once it expires, a new session is recorded. _utmb identifies the start of a session (B for "beginning". It works in conjunction with _utmc).	30 minutes from creation date	Europ France	Assistance
Google Analytics	_utmc	_ Session cookie complementary to _utmb, identifies the end of a session. It therefore expires with that one.	Expires at the end of the session	Europ France	Assistance
Google Analytics	_utmt	Used to measure request rate.	10 minutes	Europ France	Assistance
Google Analytics	_gid	Counts page views	24h	Europ France	Assistance
Google Analytics	_ga, _ga_MSSRLL 635P	Identification of website users.	2 years	Europ France	Assistance
Google Doubleclick	IDE	Stores information about how the user uses the website and any other advertising before visiting the website. This is used to show users ads that are relevant depending on the user profile.	1 year	Europ France	Assistance
Microsoft	ARRAffinity, ARRAffinitySameSite	Allows scalability management of Azure websites	Session	Europ France	Assistance

Microsoft	.AspNetCore.Antiforgery.w5W7x28NAls	Secures the page using an anti-counterfeiting cookie.	Session	Europ Assistance France
Microsoft	.AspNetCore.Culture	Used to track information about a user's preferred culture (languages)	1 year	
Microsoft	.AspNetCore.Session, .AspNetCore.CustomCookieAuth	Used to maintain the session between the visitor's browser and server.	Session	Europ Assistance France
Google Analytics	_utma	Used to calculate the number of new visitors to a particular website or page.	2 years	Europ Assistance France
Google Analytics	_utmz	Identification of the navigation source (examples: navigation from another website or search engine).	6 month	Europ Assistance France
Google Analytics	DV	Google audience measurement cookie	1 Day	Europ Assistance France

2.2. Management/Deactivation of cookies

The User can manage and withdraw his/her consent to the cookies used by the Website at any time by clicking on the "Services management" module at the bottom of the Website.

Users can also configure their browser to accept or refuse cookies on a case-by-case basis before they are installed.

Each browser is configured differently. The procedure for disabling cookies is described in the user's browser help menu, which tells them how to change their cookie preferences.

Note that deactivating cookies could prevent the use of or access to certain features of the Website.

More information on cookies: <https://www.cnil.fr/fr/site-web-cookies-et-autres-traceurs> and <https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser>.

3) Changes to the Privacy Charter

This Privacy Charter may be amended. These changes will come into force as soon as the new version of the Privacy Charter is published on the Platform page.

4) Contact

For any request relating to this Privacy Policy, the Company invites the User to contact the Data Protection Officer at protectiondesdonnees@europ-assistance.fr.