

THIRD PARTIES

Privacy Policy

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I. Definitions and scope

The terms used in this document (the “**Third Parties Privacy Policy**”) such as “**Personal Data**” or “**Processing**” have the meaning given to them by the glossary in **Section VIII** of this Third Parties Privacy Policy or, failing that, by the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals in relation to the Processing of personal data and the free circulation of this data, hereafter “**GDPR**”) or any applicable local data protection legislation (the “**Applicable DP Legislation**¹”).

This Third Parties Privacy Policy applies to the Processing of the Personal Data of the following individuals:

- suppliers and partners’ employees and other business representatives with whom AccorInvest enters or may enter into a transaction or a business relationship;
- agency workers²;
- shareholders’ representatives and members of the administrative, management and supervisory bodies of AccorInvest and
- visitors to AccorInvest’s sites.

For the purposes of this document, these persons are generally referred to as “**Third Parties**” or “**Data subjects**”.

For the avoidance of doubt, this Third Parties Privacy Policy does not apply to the Personal Data of:

- customers of AccorInvest’s hotels (for which you should refer to the [Customers Privacy Policy](#));
- employees of AccorInvest’s Entities (for which you should refer to the [Employee Privacy Policy](#)).

This Third Parties Privacy Policy covers all AccorInvest Entities’ activities, from hotel operations to asset management and support activities.

This Third Parties Privacy Policy describes how we collect and use your Personal Data during and after your relationship with us, in accordance with Applicable DP Legislation.

¹ Including in relation to the United Kingdom, the UK General Data Protection Regulation and the Data Protection Act 2018 (together, the “**UK GDPR**”)

² Except in the UK, where for the processing of agency workers personal data Employee’s Privacy Policy applies

We reserve the right to update this Third Parties Privacy Policy at any time. We may also inform the Third Parties in other ways from time to time about the Processing of their Personal Data.

II. Data processing principles

AccorInvest is committed to complying with all laws and regulations that govern the Processing of Personal Data. Accordingly, AccorInvest undertakes to apply the following principles:

- **Data collection for specific purposes - lawfulness and fairness of Processing**

Personal Data is collected and processed solely for the purposes and in the contexts described in **Section IV** of the Third Parties Privacy Policy.

Any Processing of Personal Data by AccorInvest will have a lawful basis (such as consent, the performance of a contract or legal obligation, or the pursuit of a legitimate interest) as required under Applicable DP Legislation and will take into account the rights and interest of the concerned Third Parties.

- **Transparency**

Personal Data of Third Parties is collected and Processed in a manner that is transparent and easily understandable to the concerned Third Party.

- **Data minimisation and storage limitation**

AccorInvest will only collect Personal Data that is adequate, relevant and not excessive, having regard to the purposes for which it is processed as described in **Section IV**.

The Personal Data processed is kept only for the time required for the purposes described in **Section IV** and the rules that apply to the storage and archiving of data.

- **Data security**

AccorInvest protects Personal Data from destruction, loss, tampering, disclosure or unauthorised use.

Accordingly, technical and organisational measures such as the management of access rights and computer file security (e.g. passwords, encryption) are implemented to ensure the confidentiality, integrity and availability of the Personal Data.

III. Personal Data collected

As Data Controller, AccorInvest collects and processes different categories of Personal Data.

The Personal Data collected may be:

- identity and identification data (e.g. surname, first name, gender, nationality, date and place of birth, photographs) and contact information (e.g. postal address, e-mail address and telephone number);
- information regarding your shareholding in AccorInvest's or in any other company's equity (number of shares and any notes/information to be linked to that shareholding);
- data from any communication between you and AccorInvest, including data contained in the minutes of meetings;
- economic and financial information (e.g. bank details, tax information);
- data on the use of AccorInvest's information system (e.g. IP address, login data);
- location data (e.g. travel information);
- data from CCTV and control of access to premises (e.g. security passes);
- data collected in connection with a whistleblowing system made available to AccorInvest's employees and Third Parties;
- In addition, the following Personal Data of the Agency Workers' and suppliers' and partners' employees may be collected in accordance with the applicable laws and regulations:
 - social and financial information (e.g. social security number, work permit, salary, disability information)
 - information about profession, training and career (e.g. employment contract, start date, identification number, positions held, working hours, degrees, CV)
 - copy of the driving licence
 - any other information as required by the applicable regulations;
- any other Personal Data collected or provided by you in the course of the relationship.

AccorInvest may also to the limited extent justified by the given circumstances, process certain Special Categories of Personal Data such as information revealing racial or ethnic origin, religion beliefs, biometric data or health data and Personal Data relating to criminal convictions and offences.

Where Special Categories of Personal Data are processed, AccorInvest ensures that at least one of the following conditions is met:

- you have given your express consent

- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of AccorInvest or yours under applicable employment, social security or social protection laws
- the information is made public by you
- Processing is necessary to protect your vital interests
- Processing is justified by public interest
- Processing is necessary for the observation, exercise or defence of a legal claim, or
- Processing is necessary for preventive or occupational medicine, fitness for work assessment, medical diagnoses, healthcare or social welfare, or management of health care or social protection services systems.

Where Personal Data relating to criminal convictions and offences are processed, AccorInvest ensures that the processing is authorised by Union or Member State law providing for appropriate safeguards for the rights and freedoms of data subjects. These Personal Data may be collected from publicly accessible sources or from the legal representative of a company you are legally or contractually related to.

IV. Purposes and legal basis

The processing of Personal Data is carried out for one or more specific and legitimate purposes.

The lawful Processing of Personal Data is necessary to achieve the following purposes:

| Processing purposes | Legal basis for Processing |
|---|---|
| <p>Compliance with the applicable legislation and regulations. For example:</p> <ul style="list-style-type: none"> - the social regulations (notably for those related to fight against illegal employment) - managing whistleblowing systems and compliance and ethics issues - the tax and financial regulations - the anti-bribery and anti-money laundering regulations | <p>Processing is necessary to comply with a legal obligation.</p> |
| <p>Management of the Know Your Customer process run to verify upfront compliance status of the AccorInvest potential suppliers based on the information collected through the dedicated forms</p> | <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest, understood as the proper management of its business relationships with suppliers and partners.</p> |
| <p>Management of administrative and business operations related to:</p> <ul style="list-style-type: none"> - contracts - orders - invoices - payments - management of suppliers' account - financial statistics and annual revenue per suppliers - partners and suppliers' selection - creation and update of a suppliers and partners' information database - monitoring of relationship with suppliers and partners | <p>Processing is necessary for the performance of a contract to which the data subject is a party.</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities, understood as the proper management of their business relationships with suppliers and partners.</p> <p>Processing is necessary to comply with legal obligations.</p> |

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| <p>Responding to requests from the police or from judicial or administrative authorities in the event of an inspection, audit or investigation according to the applicable law.</p> | <p>Processing is necessary to comply with legal obligations.</p> |
| <p>Allowing AccorInvest Entities to protect their rights or substantiate any claim, defence or statement in a case at hand or before the judicial and/or administrative authorities, an arbitration tribunal or a mediator, in connection with actions, disciplinary investigations or an internal or external audit or investigation.</p> | <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities, understood as protection of their rights and interests, notably for defence establishment and pursuit of legal claims.</p> |
| <p>Checking qualifications and other documents during the onboarding process of agency workers.</p> <p>Maintenance and calculation of the working time and other documentation during relationship with agency workers, preparation of workstation in accordance with the safety and hygiene regulations and other employer’s oriented tasks.</p> | <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in organizing the integration of the agency worker.</p> <p>Processing is necessary to comply with a legal obligation.</p> |
| <p>Providing services to Third Parties (providing food or accommodation, lunch vouchers, access to a company or inter-company canteen etc.).</p> | <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in providing services to Third Parties.</p> |
| <p>Organising social company events (seminars, conventions, entertainments etc.), including competitions on websites and social networks.</p> | <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in organizing company events.</p> <p>Consent to the processing of the data subject’s personal data for one or more specific purposes has been given (where applicable).</p> |
| <p>Allowing the Third Party to access and use AccorInvest’s IT tools.</p> <p>Processing of the Third Parties personal data in a form of browsing data</p> | <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in allowing access to and use of its IT tools to the Third Parties.</p> |

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| <p>Processing of personal data within the data rooms set up in relation to the AccorInvest business needs</p> | |
| <p>Ensuring security in particular in respect of:</p> <ul style="list-style-type: none"> - access to premises (e.g. security passes and CCTV recordings); - preventing and managing incidents against persons or assets (e.g., thefts, assaults, degradations); - internal and external investigations made by authorities (e.g., CCTV recordings); - access to and use of IT tools, in accordance with AccorInvest’s IT Security Policy or specific rules adopted by each AccorInvest Entity. | <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in ensuring the security of premises and infrastructure.</p> <p>Processing is necessary to comply with a legal obligation.</p> |
| <p>Day to day management of AccorInvest Entities operations for purposes such as:</p> <ul style="list-style-type: none"> - planning and budgeting - staff management - financial reporting - legal activities of the entities (ex. organization of the board and general meetings) - internal and external communication - activity reports that may include the personal data of certain categories of data subjects. | <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in pursuing their corporate objectives.</p> <p>Processing is necessary to comply with a legal obligation.</p> |
| <p>Organising internal or external training.</p> | <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities, understood as organization of training sessions.</p> <p>Processing is necessary to comply with a legal obligation.</p> |

V. Data retention

The Personal Data Processed is retained by the AccorInvest Entity in accordance with the retention obligations stipulated by applicable legal and regulatory provisions.

When the Processing is necessary for the performance of a contract to which the Third Party is a party, the retention period is equal to the term of the contract plus the statute of limitation period applicable to contractual matters.

In the absence of legal and regulatory provisions or contract, the Personal Data may be retained for the period necessary for the purposes for which it was Processed.

We may further retain the Personal Data for legal purposes and to protect AccorInvest's rights and interests until the end of the retention period as prescribed by applicable laws.

After the retention period the Personal Data will either be destroyed or anonymised. The anonymisation of the Personal Data means that it can no longer be associated with the Third Parties.

Should you need any further information, please contact us at the email address in the Appendix I "Data Privacy contact e-mail addresses" with regard to your region.

VI. Data recipients and transfers

AccorInvest may transfer Personal Data internally or externally to Recipients if this is necessary to achieve the purposes specified in **Section IV**.

The Personal Data is shared with AccorInvest's personnel authorized to receive it, and may also be transferred to external Recipients such as:

- suppliers that need the Personal Data to provide services to AccorInvest (e.g. IT service providers, auditors, hotel managers);
- financial institutions and advisers requiring the Personal Data for legal or compliance purposes;
- government, competent authorities and judicial authorities, if required by law or in connection with a criminal investigation or proceedings and in accordance with local regulations;
- external advisers (such as lawyers) to assert AccorInvest's rights and defend itself in legal proceedings;
- hotel's purchaser and third-party companies involved in transactions involving the Group's assets (e.g. assets purchasers, notary).

AccorInvest takes appropriate steps to ensure that Personal Data is protected when sharing it with staff or third-party Recipients. In all cases, the transferred data is limited to what is strictly necessary for the purposes for which it is being transferred.

In some of the above-described occasions, your personal data might be transferred to the countries that do not afford the same level of protection as the country in which the Personal Data was collected. In such case, AccorInvest will ensure that appropriate safeguards are implemented to manage this transfer (for example through standard contractual clauses).

VII. Rights of the data subjects

As data subjects, Third Parties are entitled to exercise the rights set out in Applicable DP Legislation.

Applicable DP Legislation provides that data subjects have, subject to certain conditions and limits, a right of access, to rectify and erase their Personal Data collected by an AccorInvest Entity. Data subjects also have the right to data portability, to request its restriction or to object to the Processing of their Personal Data. In the limited circumstances where you may have provided your consent to the collection, Processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific Processing at any time. You also have the right to ask the local DPO (if such local DPO has been appointed) for a copy of the legal tool we rely on to manage transfers.

When you exercise your right by using one of the email addresses listed in the **Appendix I**, please note that you contact the local DPO, if such local DPO has been appointed, or the AccorInvest persons responsible for data protection matters in the relevant country.

On the other hand, when you use the Group data privacy email address, hereafter mentioned, please note that you contact our Group DPO.

These rights can be exercised by sending either:

1. An email to one of the following:
 - (i) the relevant country's data protection e-mail address as specified in the **Appendix I** to this Third Parties Privacy Policy;
 - (ii) any other e-mail address indicated by the AccorInvest Entity that collected the Personal Data; or
 - (iii) group.dataprivacy@accorinvest.com.

2. A letter marked for the attention of the Legal department to either:
 - (i) the registered office address of the AccorInvest Entity that collected the Personal Data; or
 - (ii) AccorInvest Group SA
26A, boulevard Royal
L- 2449 Luxembourg, Grand Duchy of Luxembourg.

To protect the Personal Data of the data subject exercising their rights, AccorInvest will need to identify the data subject before responding to the request.

If there are reasonable doubts about their identity, the data subject may be asked to provide a copy of an official identity document, such as an identity card or passport, to support his or her request.

The data subjects are entitled to file a complaint with a Supervisory Authority.

In accordance with Article 27 of GDPR and the Article 27 of the UK GDPR :

- The UK AccorInvest Entities specified in **Appendix II 2a** have appointed the European Economic Area (“EEA”) entity specified in **Appendix II 2a** as their GDPR representative, the latter being authorised to act on their behalf regarding their GDPR compliance when processing data of individuals in the EEA, and to deal with supervisory authorities or data subjects in this respect;
- The AccorInvest Entities located in the EEA specified in **Appendix II 2b** have appointed the UK entities specified in **Appendix II 2b** as their UK GDPR representative, the latter being authorised to act on their behalf regarding their UK GDPR compliance when processing data of individuals in the UK, and to deal with supervisory authorities or data subjects in this respect.

VIII. Glossary

AccorInvest Entity: all the legal entities of the AccorInvest Group, i.e., companies controlled directly or indirectly by AccorInvest Group SA.

AccorInvest: all AccorInvest Entities.

Data Controller: the person who, alone or jointly with others, determines the purposes and means of Processing Personal Data.

Personal Data: any information relating to an identified or identifiable individual. An individual who can be identified, directly or indirectly, including by reference to an identifier, such as a name, identification number, location data, online or to one or more specific elements specific to one's physical, physiological, genetic, psychological, economic, cultural or social identity is deemed to be an identifiable individual.

Processing: any operation or set of operations performed or not in an automated manner and applied to data or data sets such as collection, recording, organisation, structuring, retention, adaptation or modification, extraction, consultation, use, communication by transmission, circulation or any other form of dissemination, reconciliation or interconnection, limitation, erasure or destruction.

Recipient: whether a third party or not any individual or legal entity, public authority, department or any other organisation to which Personal Data is disclosed.

We reserve the right to update this Third Parties Privacy Policy at any time, and we will provide you with a new version of the Third Parties Privacy Policy when we make any substantial updates. We may also notify you in other ways from time to time about the Processing of your Personal Data.

APPENDIX I
DATA PRIVACY CONTACT E-MAIL ADDRESSES

- **France & Luxembourg:** donnees.personnelles@accorinvest.com
- **UK:** gdpr_uk@accorinvest.com
- **Belgium, Netherlands, Luxembourg** (except head office): gdpr_benelux@accorinvest.com
- **Germany, Austria:** datenschutz@accorinvest.com
- **Portugal :** accorinvest.pt.protecao.dados@accorinvest.com
- **Spain:** accorinvest.sp.proteccion-datos@accorinvest.com
- **Poland:** pl.gdpr@accorinvest.com
- **Czech Republic:** cz.gdpr@accorinvest.com
- **Slovakia:** sk.gdpr@accorinvest.com
- **Hungary:** hu.gdpr@accorinvest.com
- **Romania:** ro.gdpr@accorinvest.com
- **Lithuania:** lt.gdpr@accorinvest.com
- **Switzerland :** gdpr-switzerland@accorinvest.com

**APPENDIX II:
GDPR and UK GDPR'S REPRESENTATIVES**

2a – GDPR's representatives

The following UK AccorInvest Entities :

- 1) Accor UK Business & Leisure Hotels Limited (registered in England and Wales with company number 01016187)
- 2) Accor UK Economy Hotels Limited (registered in England and Wales with company number 01244907)

have appointed as GDPR representative the following EEA entity:
AccorInvest Group SA, registered under the laws of Luxembourg with company number 100771, located 26A boulevard Royal – 2449 Luxembourg – Grand-Duchy of Luxembourg.

2b – UK GDPR's representatives

All AccorInvest Entities located in the EEA which operate hotels activities have appointed as UK GDPR representative the following UK entity:

Accor UK Business & Leisure Hotels Limited, registered under the laws of England and Wales with company number 01016187, located 10 Hammersmith Grove – London W6 7 AP – United Kingdom.