

CUSTOMERS

Privacy Policy

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I. Purpose and scope

The main purpose of this Customers Privacy Policy is to enable the AccorInvest Entities acting as the data controllers to provide their Customers with information about processing of their personal data when they visit a hotel or another establishment owned by an AccorInvest Entity.

The Customers Privacy Policy aims to present the information in a transparent and clear manner that shall enable the Customers to easily understand the processing of their personal data. The Customers Privacy Policy covers all AccorInvest Entities' activities, from hotel operations to support activities. It describes how we collect and use your Personal Data during and after your relationship with us, in accordance with the applicable data protection legislation.

The terms used in the Customers Privacy Policy such as "**Personal Data**", "**AccorInvest Entities**", "**Customers**" or "**Processing**" have the meaning given to them by the **Glossary** in **Section X** or, failing that, by the General Data Protection Regulation (article 4 of the 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 (the "**GDPR**")) or the applicable local data protection legislation (together, the "**Applicable DP Legislation**¹").

As a Customer, your personal data will also be dealt with by the company owner of the trademark of the hotel you stayed in, such as the French company Accor SA as well as by the company that provides management services and other services to the hotels, such as affiliated entities of Accor SA. To learn more about the Accor's role in processing of the Customers Personal Data please refer to the **Section IX** of the Customers Privacy Policy and check out [Accor Customer Personal Data Protection Charter](#).

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

- Employee of AccorInvest's Entities (for which you should refer to the [Employee Privacy Policy](#)); or
- other data subjects such as suppliers, shareholders or visitors (for which you should refer to the [Third Parties Privacy Policy](#)).

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

II. Data controller - DPOs

The data controller of the processing activities presented in this policy is the AccorInvest Entity that operates the hotel, whose identity and contact details are accessible in the Privacy notice available at the hotel or by contacting us at the e-mail address mentioned in **Appendix 1**.

A Group Data Protection Officer (DPO) has been designated by AccorInvest Group S.A. In addition to that, some of the AccorInvest Entities have designated a local DPO. The e-mail addresses at which the Group DPO and the local DPOs can be contacted are mentioned in **Appendix 1**. The local DPO is the main contact for the national Supervisory Authority.

III. Data processing principles

AccorInvest is committed to complying with all the laws and regulations that govern the Processing of Personal Data. Accordingly, and in relation to the provided services, 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 VI**.

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 the Applicable DP Legislation.

- **Transparency**

Personal Data is collected and Processed in a manner that is transparent and easily understandable to the Customer.

- **Data minimisation, accuracy 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 VI**.

The Personal Data Processed is kept only for the time required for the purposes and in accordance with the principles described in **Section V**.

- **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.

IV. Personal Data collected

As Data Controller, AccorInvest collects and Processes different categories of Customer's 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, voice, signature, client identification, passport or ID number)
- contact information (e.g. postal address, e-mail address and telephone number)
- occupation and employer
- information concerning previous stays
- arrival and departure dates
- total cost of the stay
- data from any communication between you and the hotel
- Customer's comments about the hotel
- financial data such as credit card number
- data from CCTV
- data from the magnetic cards and locks for access to the rooms
- family situation
- preferences of stay and interests (for example, smoking or non-smoking room, preferred floor, type of bedding, type of newspapers/magazines, sports, cultural interests, food and beverages preferences, etc.)
- membership of a loyalty program, membership number
- technical data (such as IP address, logs)
- list of newsletters that you may subscribe to
- navigation data.

AccorInvest may also exceptionally process certain Special Categories of Personal Data (as defined by the GDPR) such as information revealing handicap, health conditions or religious opinion derived notably from food preferences in order to provide a possibly tailor-made and secure service adapted to the needs of its Customers.

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

- you have given your explicit consent to the Processing of your Personal Data for one or more specified purposes
- Processing is necessary for the purposes of carrying out the legal obligations and exercising specific rights of AccorInvest or yours in the field of applicable law
- 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.

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 Customer is party, the retention period is equal to the term of the contract plus the limitation period applicable to contractual matters.

In the absence of such legal and regulatory provisions, 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 data subject.

Should you need any further information, please contact us at the e-mail address mentioned in **Appendix 1** with regards to your country.

VI. Purposes and legal basis of Processing

The Processing of Personal Data is carried out for a specified explicit and legitimate purpose. A simple Processing purpose may have one or more basis for the lawfulness of the processing.

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 regulation such as:</p> <ul style="list-style-type: none"> - storing of accounting documents - managing data subject's requests regarding their Personal Data - regulations related to the entry and stay of aliens (registration forms) 	<p>Necessary to comply with a legal obligation.</p>
<p>Management of administrative and fiscal operations related to:</p> <ul style="list-style-type: none"> - contracts - orders - invoices - payments - management of Customers' account - financial statistics 	<p>Necessary for the performance of the contract to which the Customer is a party.</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in the management of the operations with Customers.</p> <p>Processing is necessary to comply with a legal obligation.</p>
<p>Responding to requests from the police or from judicial or administrative authorities in the event of an inspection or investigation according to the applicable law.</p>	<p>Necessary to comply with a legal obligation.</p>
<p>Allowing AccorInvest Entities to protect their rights or substantiate any claim, defence or statement in a case or before the judicial and/or administrative authorities, an arbitration tribunal or a mediator, in connection with actions, investigations or an internal or external audit or investigation.</p>	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in protecting their rights and interests.</p>

<p>Allowing the Customer to access and use AccorInvest's hotels IT tools.</p>	<p>Necessary for the performance of the contract to which the Customer is a party.</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in protecting their rights and interests.</p>
<p>Ensuring security in particular in respect of:</p> <ul style="list-style-type: none"> - access and monitoring of the premises (e.g. magnetic cards and locks and CCTV recordings). 	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in ensuring the security of premises and infrastructure.</p> <p>Necessary to comply with a legal obligation.</p>
<p>Management of reservation (conference rooms, restaurant and accommodation requests).</p>	<p>Necessary for the performance of the contract to which the Customer is a party.</p> <p>Necessary to comply with a legal obligation.</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities by contacting the Customers and providing them with requested products and services.</p> <p>Processing based on your consent only for Special Categories of Personal Data collected for managing food preference/allergy.</p>
<p>Managing and improving the quality of the service during the stay at the hotel notably by:</p> <ul style="list-style-type: none"> - managing access to rooms - monitoring the use of services (telephone, bar, pay TV etc.) - managing the relationship with the Customer before, during and after the stay by collecting his/her preferences regarding the services experienced during the stay. 	<p>Performance of a contract with the Customer.</p> <p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in providing the Customer with requested products and services.</p>

<p>Promoting the hotels services notably by:</p> <ul style="list-style-type: none"> - sending newsletters, promotions, hotel offers, or contacting you by telephone - organize game contests - sharing opinions given about the hotel 	<p>Performance of the contract to which the Customer is a party</p> <p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in promoting AccorInvest hotels services.</p> <p>Necessary for the purposes of the legitimate interest pursued by the AccorInvest Entities understood as sending electronic communications to the Customer related to the hotels products or services similar to those you previously contracted or subscribed with hotel of your stay.</p> <p>In case of electronic communication related to another kind of products or services than the ones concerning hotels services or when it is required by the applicable law, we will ask for the Customer's prior consent.</p>
<p>Improving hotels services, in particular:</p> <ul style="list-style-type: none"> - Carrying out surveys and analyses of questionnaires and Customer comments; - Managing claims/complaints; - Developing statistics and carrying out reporting of the same. 	<p>Necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in improving hotels services.</p>

VII. 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 VI**.

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. Accor S.A. or its affiliated entities acting as manager of the hotels, IT services providers, auditors)
- financial institutions
- governments, 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 its rights and defend itself in legal proceedings
- hotel business' purchasers and other third-party companies involved in assets transactions (e.g. law firm, notary).

Your Personal Data may be also shared with the French company Accor S.A. and its affiliated companies.

AccorInvest takes appropriate steps to ensure that Personal Data is protected when sharing it with Recipients (internal, external and third parties). In all cases, the transferred data is limited to what is strictly necessary for the purposes for which it is being transferred.

Please note that AccorInvest Entities are located throughout the world. As a result, your personal data may be transferred outside the country where you are located. This includes transfers to foreign countries where the law does not provide sufficient protection for personal data according to the local regulation.

In order to ensure the lawfulness of data transfers, AccorInvest Entities will ensure that appropriate safeguards are implemented with regards to such transfers (for example through standard contractual clauses).

VIII. Rights of the Customers

As Customers and data subjects, you are entitled to exercise the rights set out in the 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 of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific Processing at any time.

You have also the right to ask for the information and copy of the safeguards we put in place with regards to the data transfers to foreign countries where the law does not provide sufficient protection for personal data according to the local regulation.

These rights can be exercised by sending either:

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

When you exercise your right by using one of the e-mail addresses mentioned in **Appendix 1**, 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.

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
Data Privacy department
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.

As data subject You are also 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 2a** have appointed the European Economic Area ("EEA") entity specified in **Appendix 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 2b** have appointed the UK entities specified in **Appendix 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.

IX. Processing of personal data by Accor (for the hotels operated under a brand owned by Accor)

As our Customer that benefits from the AccorInvest Entities services, you should be also aware that your personal data might be processed by our business partner company Accor S.A. (82 rue Henri Farman, 92130 Issy-les-Moulineaux - France) as the owner of the hotel's trademark or by Accor's affiliated companies, that provide hotel management services and other relevant services to the AccorInvest Entities.

As a result Accor may process the Customer's personal data independently from the AccorInvest Entities as the data controller for the purposes and with the data protection measures, detailed in the Accor Personal Data Protection Charter. Accor S.A. may also act as the joint data controller in relation to the Customers (guests) personalization program available at AccorInvest hotels, where Customers stay preferences are collected by the hotels during their stay.

You can access to the Accor Personal Data Protection Charter by visiting **Accor Customer Personal Data Protection Charter**. If you have any question regarding the processing of your personal data by Accor Group entities, you can also contact Accor's Data Protection Officer at accorhotels.dpo@accor.com.

X. Glossary

AccorInvest Entity: any legal entity of the AccorInvest Group, i.e., companies controlled directly or indirectly by AccorInvest Group SA, including hotels owned by such entities.

AccorInvest: all AccorInvest Entities.

Customers Privacy Policy: the presented document together with the Appendices, that provides the general knowledge and understanding of the processing of the Customers' personal data by AccorInvest.

Customers: hotels' guests, AccorInvest clients business representatives and any other visitors of the hotels, whose personal data is processed by the 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 Customers Privacy Policy at any time, and we will provide you with a new Customers 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.

Last update: [23/08/2022]

APPENDIX 1: DATA PROTECTION OFFICERS (DPOs) AND OTHER PERSONS' CONTACT DETAILS

- **France** : donnees.personnelles@accorinvest.com
- **UK**: gdpr_uk@accorinvest.com
- **Belgium, Netherlands, Luxembourg** : 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
- **Italy and Greece**: it.gdpr@accorinvest.com
- **Switzerland**: gdpr-switzerland@accorinvest.com

APPENDIX 2: 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.