



Personal Data Protection Policy

Last updated: 31/03/2025

TRAVEL PLANET GROUP (hereinafter "Travel Planet") hereby informs you, in its capacity as data controller, of the processing of your personal data. We process your data for the purposes set out below, which include, in particular, identity data, contact data, and travel data.

The personal data collected is not used for commercial purposes. Please note that this data is collected solely for the purpose of providing services under a service agreement concluded between Travel Planet and the Client, relating to the business travel of its employees.

In the event of any inconsistency between the contents of this Personal Data Protection Policy and the provisions of the contracts you have concluded with us, the contractual provisions shall prevail.

If you have any questions about your data, you may contact Travel Planet or our Data Protection Officer at the following address:

Travel Planet

230 Route des Dolines

06560 VALBONNE

Data Protection Officer

dpo@my-travelplanet.com

I. Types of Personal Data Collected and Processed

The data collected and processed by Travel Planet includes:

- Identity Data: company name, login (if different from the employee's email), first name, last name, title, gender, date of birth, and passport information (optional).
- Contact Data: address (optional), phone numbers, email addresses.
- Travel Data: preferred language, preferred currency, discount or membership cards (optional), departure location, destination, departure time, arrival time, airline, class, and fare.
- Billing Data: billing analysis fields (department within the company concerned by the billing).
- User Profile Customization Data on the Travel Planet Website: preferred language and preferred currency.

230 Route des Dolines, 06560 VALBONNE

Tel : +33(0)9 72 10 05 90 - E-mail : solutions@my-travelplanet.com

www.my-travelplanet.com

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II. How We Use and Share Personal Data

A) Purposes of Processing: Your personal data is processed for the following purposes:

- To deliver all the services selected by the company for its employees' business travel, including related ancillary services,
- To transmit, as required by regulatory information, data to third parties involved in the provision of these services,
- To manage the contractual relationship, including the sending of letters and emails related to subscribed services,
- To manage customer satisfaction, for example through satisfaction surveys,
- To compile statistics needed by the Client, Travel Planet, and its affiliates,
- To issue invoices related to the services provided,
- For debt collection, litigation management, and evidence handling,
- To manage your requests regarding your personal data rights.

B) Sharing of Your Data: Your data may be shared, depending on the processing purpose, with:

- (i) service providers involved in delivering our services (transport companies, hotels, restaurants, car rental agencies, etc.);
- (ii) legal or governmental bodies as part of our legal and regulatory obligations.

C) Legal Bases: The processing of personal data is carried out in accordance with the following legal bases:

- To execute contracts related to the services you have subscribed to with us,
- To pursue our legitimate interests, in compliance with your rights, such as improving our services and developing our business.

Security: Travel Planet implements organizational, technical, software, and physical measures to ensure digital security and protect your personal data from loss, unauthorized access, disclosure, or alteration. In addition, Travel Planet staff are bound by confidentiality obligations concerning your data.

D) Data Retention: Travel Planet retains your personal data for the duration necessary to fulfill the processing purpose, extended where applicable by legal retention and limitation periods (typically five years following the end of the contractual relationship).

To comply with our legal obligations or respond to requests from regulators and administrative authorities, as well as for historical, statistical, or scientific research purposes, we may archive your data under conditions provided by law.

For prospective clients, data is deleted three years after the last contact.

You will find more detailed information on these data processing activities in Appendix 1.

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III. Your Rights Regarding the Processing of Personal Data

You may, at any time and upon simple request, under the conditions provided by law, (i) access your personal data, (ii) request its correction, (iii) request its deletion, (iv) request the restriction of its processing, (v) request its portability, and (vi) provide us with general or specific instructions regarding the handling of your data in the event of your death. You may also object, under the conditions provided by law, to the use of your data for processing operations carried out based on our legitimate interests.

Please note that exercising certain rights may, in some cases, prevent Travel Planet from providing certain services. You can exercise your rights by contacting us at the address mentioned above; postage costs will be reimbursed upon request.

Further information on each of these rights is available in Appendix 2.

In the event of a dispute, you may file a complaint with the CNIL (French Data Protection Authority), whose website is available at www.cnil.fr and whose headquarters are located at 3 Place de Fontenoy, 75007 Paris.

Full Name and Signature:



Appendix 1: Non-Exhaustive Overview of Information Related to Your Interactions with Us and Their Impact on Your Personal Data

Sub-purpose & Reference	Relevant Contracts (non-e	Legal Basis for Processing	Data Retention Period	Data Recipients	Data Obtained from Third
Service Delivery	Service Agreement	Necessary for the perform	Five (5) years* from: - the	- Travel Planet - Third-part	Some data is provided by
Production of Statistics or	Service Agreement	Necessary for the perform	Five (5) years* from: - the	- Travel Planet - The Client	Some data is provided by

Some specific processing operations or those concerning a limited number of clients are not mentioned in this data protection policy. In such cases, affected clients will be informed directly through appropriate communication channels.

Purpose 1: Implementation of Travel Planet Services

* Subject to the application of longer statutory retention or limitation periods



Purpose 2: Invoicing and Accounting Obligations

Sub-purpose & Reference	Relevant Contracts (non-e	Legal Basis for Processing	Data Retention Period	Data Recipients	Data Obtained from Third
Issuance of Invoices	Service Agreement	Legal retention requireme	Ten (10) years* from the c	- Travel Planet - The Client	Some data is provided by t

* Subject to the application of longer statutory retention or limitation periods.

Purpose 3: Debt Recovery, Dispute Management, and Evidence
General Description: All procedures used to recover amounts owed by the debtor.

Sub-purpose & Reference	Relevant Contracts	Legal Basis for Processin	Data Retention Period	Data Recipients	Data Obtained from Thir
Debt Recovery / Client Re	All services provided by T	Necessary for the perfor	Five (5) years* from: - the	- Travel Planet - Judicial c	Some data is provided by

* Subject to the application of longer statutory retention or limitation periods.



Appendix 2: Additional Information About Your Rights

You have the following rights regarding the processing of personal data carried out by Travel Planet. For more information, Travel Planet invites you to consult the CNIL website: www.cnil.fr.

- **Right of Access:** You have the right to obtain confirmation from the data controller as to whether or not your personal data is being processed, and, where it is, access to such data and information about the purposes of the processing (Article 15 of Regulation 2016/679 on the protection of personal data – "GDPR"). Clearly unfounded, excessive, or repetitive requests may not receive a response.
- **Right to Rectification:** You have the right to obtain from the data controller, without undue delay, the correction of any personal data you believe to be inaccurate (Article 16 of the GDPR).
- **Right to Erasure:** You have the right to obtain from the data controller the erasure of your personal data, subject to the conditions and limitations set out in Article 17 of the GDPR.
- **Right to Data Portability:** You have the right to receive the personal data you have provided to the data controller in a structured, commonly used, and machine-readable format (Article 20 of the GDPR). This right applies only to data you have provided, where the processing is based on your consent or a contract, and is carried out by automated means.
- **Right to Withdraw Consent:** You have the right to withdraw your consent to the processing of your data when such processing is based on consent. The withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal. Please refer to the tables above to determine whether a particular processing operation is based on consent.
- **Right to Restriction of Processing:** You have the right to request the restriction of the processing of your personal data under the conditions set out in Article 18 of the GDPR.
- **Right to Object:** You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data where the processing is based on legitimate interest (Article 21 of the GDPR).
- **Right to Define Post-Mortem Instructions:** You have the right to define directives regarding the retention, deletion, and communication of your personal data after your death (French Law No. 78-17 of January 6, 1978, as amended, Article 40 II).
- **Right to Lodge a Complaint with a Supervisory Authority:** Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data constitutes a violation of applicable data protection regulations (Article 77 of the GDPR).

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