

PRIVACY POLICY OF THE SAS ATTRAP'RÊVES WEBSITE

CLAUSE 1: INTRODUCTION

This privacy policy applies to the website of SAS Attrap'Rêves, a simplified joint-stock company (*société par actions simplifiée*), whose headquarters are located at 1 chemin de la Ribassière, 13190 Allauch, France and which is registered in Marseilles under number 520 456 096.

The purpose of this privacy policy is to explain the following to users of the Attrap'Rêves website (hereinafter "the Website"):

- How their personal data is collected and processed. Personal data includes any information that can be used to identify a user. This includes the user's first and last name, age, postal address, email address, location and IP address;
- The rights of users concerning this data;
- Who is responsible for handling the personal data collected and processed;
- To whom this data is transmitted;
- The Website's policy on cookies, if applicable.

This privacy policy supplements the legal disclaimer and the General Terms and Conditions of Use of the Website which users can find at the following link:

<https://www.attrap-reves.com>

CLAUSE 2: GENERAL PRINCIPLES RELATING TO THE COLLECTION AND PROCESSING OF PERSONAL DATA

In accordance with the provisions of Article 5 of the European General Data Protection Regulation 2016/679 ("the GDPR"), the collection and processing of personal data of users of the Website shall comply with the following principles:

- Lawfulness, fairness and transparency: data can only be collected and processed with the consent of the user who owns said data. Whenever personal data is collected, the user will be informed that his or her data is being collected, and for what purpose it is being collected;
- Limited purposes: the collection and processing of data is carried out to meet one or more of the purposes set out in these General Terms and Conditions of Use;
- Minimisation of data collection and processing: only data necessary for the proper performance of the Website's objectives are collected;
- Limited retention of data: data is stored for a limited period of time, of which the user is informed. If this information cannot be communicated, the user will be informed of the criteria used to determine the retention period;
- Integrity and confidentiality of collected and processed data: the data controller undertakes to guarantee the integrity and confidentiality of the data collected.

In order to be lawful, and in accordance with the requirements of Article 6 of the GDPR, the collection and processing of personal data may only take place if at least one of the following conditions is met:

- The user has expressly consented to the processing;
- The processing of the data is necessary for the proper performance of an agreement;
- The processing is carried out in accordance with a legal requirement;
- The processing is necessary for the protection of the vital interests of the user concerned or of another individual;
- Processing may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority;
- The processing and collection of personal data is necessary for the purposes of the legitimate and private interests of the data controller or of a third party.

CLAUSE 3: PERSONAL DATA COLLECTED AND PROCESSED WHEN BROWSING THE WEBSITE

A. DATA COLLECTED AND PROCESSED AND METHOD OF COLLECTION

The personal data collected on the Attrap'Rêves Website is as follows:

- First name and last name
- Company name (if any)
- Postal address
- Telephone/Mobile number
- Email address

This data is collected when the user performs one of the following actions on the Website:

Personal data is collected:

- When the user submits a query or a request for information;
- When the user places an order online to book a stay or purchase a gift voucher;
- When a person who has been offered a gift voucher registers to book a night at Attrap'Rêves.

Furthermore, when a payment is made on the Website, proof of the transaction, including the order form and the invoice, will be kept in the Website publisher's information systems.

The data controller will keep all the data collected in the Website's information systems under reasonable security conditions for a period of 3 years or for the duration of the business relationship.

The collection and processing of data is carried out under the following circumstances:

- Within the context of the business relationship when the user books or purchases a voucher for an overnight stay;
- When a person who has been offered an overnight stay wishes to book a date to stay at Attrap'Rêves;
- Within the framework of a request for information or contact, in order to respond to the request.

B. TRANSMISSION OF PERSONAL DATA TO THIRD PARTIES

The user's personal data may be passed on to the following third parties:

- Attrap'Rêves' chartered accountant in the context of the management of the company's accounts (name and postal address only).

C. DATA HOSTING

The Attrap'Rêves Website is hosted by: Anthemis - Hébergement, whose headquarters are located at the following address: 1 rue du 35ème Régiment d'Aviation, 69500 Bron, France

The Website host can be contacted at the following telephone number: +33 4 37 43 18 02 or by email at contact@anthemis-hebergement.com

The data collected and processed via the Website are exclusively hosted and processed in France.

CLAUSE 4: DATA CONTROLLER

A. DATA CONTROLLER

The person responsible for handling personal data is: [Geoffrey Torro](#).

He can be contacted in the following ways:

By email at rgpd@attrap-reves.com or by letter at the following address: ATTRAP-REVES, chemin de la Ribassière, 13190 Allauch, France.

The data controller is responsible for determining the purposes and means of processing personal data.

B. OBLIGATIONS OF THE DATA CONTROLLER

The data controller undertakes to protect the personal data collected, not to transmit it to third parties without the user's knowledge and to respect the purposes for which the data was collected.

The Website has an SSL (Secure Sockets Layer) certificate to ensure that information and data being transferred through the Website are secure.

The purpose of an SSL certificate is to safeguard the data exchanged between the user and the Website.

In addition, the data controller undertakes to notify the user in the event of the rectification or deletion of the data, unless this would entail disproportionate formalities, costs and procedures.

In the event that the integrity, confidentiality or security of the user's personal data is compromised, the controller undertakes to inform the user by any means.

CLAUSE 5: RIGHTS OF THE USER

In accordance with the regulations concerning the processing of personal data, the user enjoys the rights listed below.

In order for the data controller to comply with the user's request, the user is obliged to provide the following information: first and last name, email address and, if relevant, his/her personal account number or subscriber number.

The data controller is obliged to respond to the user within a maximum of 30 (thirty) days.

A. PRESENTATION OF THE USER'S RIGHTS REGARDING DATA COLLECTION AND PROCESSING

a. Right of access, rectification and deletion

The user can access, update, modify or request the deletion of data relating to him/her, by respecting the following procedure:

All of Attrap'Rêves' customers have a customer account where they can consult their replies to requests for consent and modify them. With respect to data deletion requests, the customer must send such a request in writing to the headquarters of Attrap'Rêves (the address can be found in the footer of the Website) along with proof of identity of the person making the request.

If the user has a personal account, he/she has the right to request the deletion of their personal account by following the procedure below:

The customer must send his/her request in writing to the headquarters of Attrap'Rêves (the address can be found in the footer of the Website) along with proof of identity of the person making the request (copy of identity card or passport).

b. Right to data portability

The user has the right to request the transfer of his/her personal data, held by the Website, to another Website, by complying with the following procedure:

The customer must send his/her request in writing to the headquarters of Attrap'Rêves (the address can be found in the footer of the Website) along with proof of identity of the person making the request (copy of identity card or passport).

c. Right to restrict and object to the processing of data

The user has the right to request the restriction of or to object to the processing of his/her data by the Website, which cannot be refused by the Website, unless the latter can prove that it has legitimate and compelling reasons for doing so, which would prevail over the interests and rights of the user.

In order to request the restriction of the processing of his/her data or to formally object to the processing of his/her data, the user must follow the procedure below:

The customer must send his/her request in writing to the headquarters of Attrap'Rêves (the address can be found in the footer of the Website) along with proof of identity of the person making the request (copy of identity card or passport).

d. Right not to be subject to a decision based exclusively on an automated process

In accordance with the provisions of the GDPR, the user has the right not to be subject to a decision based solely on automated processing if it produces legal effects concerning him or her, or significantly affects him or her in a similar manner.

e. Right to determine the fate of data after death

The user is reminded that he/she can organise what should happen to his/her collected and processed data in the event of his/her death, in accordance with French Act no. 2016-1321 of 7 October 2016.

f. Right to refer to the competent supervisory authority

In the event that the data controller decides not to respond to the user's request, and the user wishes to contest this decision, or, if he/she believes that one of the rights listed above has been infringed, he/she is entitled to refer the matter to the French Data Protection Authority (*Commission Nationale de l'Informatique et des Libertés* or "CNIL", <https://www.cnil.fr>) or any competent judge.

B. PERSONAL DATA OF MINORS

In accordance with the provisions of Article 8 of the GDPR and the French Data Protection Act, only minors aged 15 or over may consent to the processing of their personal data.

If the user is a minor under the age of 15, the consent of a legal representative is required in order for his/her personal data to be collected and processed.

The Website publisher reserves the right to verify by any means that the user is over 15 years of age, or that he/she has obtained the agreement of a legal representative before browsing the Website.

CLAUSE 6: USE OF COOKIES

The Website may resort to the use of cookies.

A cookie is a small file (less than 4 kb), stored by the Website on the user's hard drive, containing information about the user's browsing habits.

These files allow the Website to process statistics and information on traffic, to facilitate browsing and to improve the service for the user's benefit.

The use of cookies involving the storage and analysis of personal data is strictly subject to the user's consent.

The user's consent is considered valid for a maximum period of 13 (thirteen) months. At the end of this period, the Website must again request the user's permission to save cookies on his/her hard drive.

a. Objection by the user to the use of cookies by the Website

Users are informed that they may object to the storage of these cookies by configuring their browser software.

Information on how to configure your browser to prevent the storage of cookies can be found at the following links:

- **Chrome:** <https://support.google.com/accounts/answer/61416?hl=en&co=GENIE.Platform%3DDesktop>
- **Firefox:** <https://support.mozilla.org/en-US/kb/block-websites-storing-cookies-site-data-firefox>
- **Safari:** <https://www.apple.com/legal/privacy/en-ww/>
- **Internet Explorer:** <https://support.microsoft.com/en/help/17442/windows-internet-explorer-delete-manage-cookies>
- **Opera:** <http://www.opera.com/help/tutorials/security/cookies/>

In the event that the user decides to disable cookies, he or she may continue to browse the Website. However, any malfunction of the Website caused by this action cannot be considered to be the fault of the Website publisher.

b. Description of the cookies used by the Website

The publisher of the Website draws the user's attention to the fact that the following cookies are used during browsing:

- PHPSESSID (unique identifier for managing exchanges between the Internet user and the application server)
 - - lang (language management on the visitor's end)
 - sidebarheight (sidebar height memo)
- These cookies are necessary for the functioning of the application and are only valid during the session.
- Consentcootra: tracking of acceptance of the use of trackers and cookies with a lifetime of 12 months
 - -_ga and -gid: tracking of browsing history by and for analytics.

Commenté [ON1]: Texte français à modifier - PHPSESSID et non pas PHPSEDDID

When browsing the Website, the user is made aware that third-party cookies may be stored. More specifically, this concerns the following third parties: Google and Facebook

In addition, the Website integrates social network buttons, allowing the user to share his/her activity on the Website. Cookies from these social networks may therefore be stored on the user's computer when he/she uses these functions.

The user's attention is drawn to the fact that these Websites have their own privacy policies and general terms and conditions of use that may differ from those of the Website. The publisher of the Website invites users to consult the privacy policies and general terms and conditions of use of these websites.

CLAUSE 7: TERMS AND CONDITIONS FOR CHANGING THE PRIVACY POLICY

This privacy policy can be consulted at any time at the following address:

- On the respective websites of the publishers mentioned (urls subject to change frequently)

The publisher of the Website reserves the right to modify it in order to ensure its compliance with the law.

Users are therefore invited to consult this privacy policy regularly in order to be informed of the latest changes.

However, in the event of a substantial change to this policy, the user will be informed in the following manner:

The latest version of the privacy policy is published online and can be consulted on the Website. Should any significant changes be made to the privacy policy, users will be informed of important changes in Attrap'Rêves' privacy policy by means of an email campaign to its customers.

It is brought to users' attention that the last update to this privacy policy occurred on: 19/07/2019. [19/07/2019](#).

CLAUSE 8: USER ACCEPTANCE OF THE PRIVACY POLICY

By browsing the Website, the user certifies that he/she has read and understood the present privacy policy and accepts its terms and conditions, particularly with regard to the collection and processing of his/her personal data, as well as the use of cookies.