

Atout France

INFORMATION NOTICE FOR PARTNERS, CLIENTS OR PROSPECTIVE CLIENTS

The following information is provided to you so that you are aware of Atout France's commitments regarding personal data protection.

This information will also allow you to gain knowledge of your rights, as well as the conditions under which personal data are collected, processed, stored and archived.

As part of your contractual relationship or your prior authorization, Atout France processes personal data (hereinafter the "processing") which relate to you.

The categories of personal data processed by Atout France are mainly collected in the context of Atout France's mission and regarding the promotion of French tourism in all territories. In this context, the following personal data categories are processed :

- **General personal data**

Example: Identifying data such as name, surname or contact, etc.;

- **Connection data**

Example: e-mail address, operating cookies, etc.;

- **Professional data**

Example: Position held.

You are a partner or prospective client or client of Atout France, this information notice is provided to you to inform you of your rights and the terms and conditions for the use of your personal data.

You hereby acknowledge that this information notice informs you of the purposes, the legal framework, the interests, the recipients or categories of recipients with whom we share your personal data and the possibility of transferring your data to a third country.

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1. Preamble

1. Atout France is in the process of ensuring compliance with the rules imposed by the European Regulation on personal data protection. Our personal data protection policy is now compliant with these rules, which involves our informing you of our personal data protection policy by communicating this information notice to you.

2. Atout France is responsible for the processing set out herebelow regarding your personal data.

2. Contents of the information notice

2.1 Who are we?

2.1.1 Data controller

The following information is communicated to you so that you are aware of the personal data protection commitments of Atout France, whose registered office is located at 200/216 rue Raymond Losserand – CS 60043 – 75680 Paris Cedex 14, who acts as data controller for the processing of personal data referred to in this document.

The data controller within the meaning of the European data protection Regulation undertakes to protect personal data and to keep it confidential.

2.1.2 Our data protection officer

Atout France has appointed a data protection officer, whose contact details are as follows:
dpo@atout-france.fr.

2.2 The personal data, which we process

Atout France collects and processes the following data, for the purposes and legal bases presented below:

- Identifying data (e.g. surname, first name, address, professional contacts, etc.);
- Connection data (e.g. email address, operation and analysis cookies...);
- Sensitive data (e.g. information on intolerances in the context of events organization).

2.3 The purposes and legal bases of our data processing

2.3.1 The purposes and the legal bases of the processing, which we carry out

The processing of personal data are carried out for the following purposes and on the following bases:

- registration of tour and holiday operators and maintenance of the public register of tour and holiday operators ;
- classification of commercial tourist accommodation and maintenance of the public register of classified accommodation ;
- Palace classification and Vignobles & Découvertes Label, the management of which has been entrusted by the French State to Atout France ;
- organization of events ;
- organization of investigations ;
- organization of competitions ;
- organization of training ;
- management of professional contact files ;
- management of member and prospective client files ;
- promotional and communication operations ;
- studies.

2.3.2 The legitimate interests pursued

The legitimate interests pursued by Atout France may in particular consist in:

- Promotion or communication operations for the France destination to best fulfil the missions of general interest entrusted to Atout France,
- Qualitative and quantitative surveys,
- Qualification of adherent data,
- Organization and follow-up of events,
- Surveys,
- Management of operating and analysis cookies of Atout France websites.

2.4 The recipients of your data

The personal data that we collect, as well as that which is collected subsequently, is intended for us in our capacity as data controller.

We ensure that only authorized persons can have access to this data. Our service providers may be recipients of this data to perform the services we entrust to them. Some personal data may be sent to third parties or to legally authorized authorities (eg state administrations, auditor) in order to meet our legal, regulatory or contractual obligations.

Atout France has set up offices throughout the world in order to carry out its assignments. These offices and subsidiary come under the responsibility of Atout France Paris.

Your personal data may be the subject of reconciliation, pooling or sharing between all of Atout France's offices as well as its subsidiary.

Your personal data may be communicated to these offices and subsidiary for the purposes referred to in this information notice. These operations are carried out on the basis of instruments that comply with applicable regulations and are able to ensure the protection and respect of your rights.

2.5 The transfer of your data

We transfer your personal data to Atout France's offices located in the following countries: Atout France website— international network: <http://www.atout-france.fr/notre-reseau>

Atout France transfers your personal data to a third country or to an international organization subject to an adequacy decision issued by the European Commission. In the absence of an adequacy decision, transfer of personal data would only be carried out on the condition of the implementation of appropriate safeguards. You always have opposable rights and effective remedies, under the conditions of the Regulation in force.

2.6 The retention periods applied to your data

The retention periods that we apply to your personal data are proportionate to the purposes for which they were collected. Consequently, we organize our data retention policy as follows:

Atout France is committed to keeping personal data in accordance with legal obligations. Given the international scope of its activities, Atout France processes the personal data of residents of different territories. Also, and in order to preserve the rights of all those concerned, Atout France has defined its retention rules according to the most restrictive regulations of all of these countries. The reference table attached hereafter completes this information.

2.7 Your rights

2.7.1 Terms and conditions for exercising your rights

You may exercise your rights by electronic mail at the following address: contact.rgpd@atout-france.fr with proof of your identity.

In order to do so, you should clearly set out your surname(s), first name(s) and the address where you would like the form for the request to exercise your rights to be sent to. Immediately upon receipt of your duly completed, dated and signed form, to which you shall have attached a photocopy of an identification document including your signature, Atout France will be in a position to respond to your request. The form may also be sent by post to Atout France – Service Juridique (Legal Department) – 200/216 rue Raymond Losserand – CS 60043 – 75680 Paris Cedex 14 – France.

In principle, you can exercise all of your rights, free of charge. However, in terms of the right of access, you may be asked to pay a reasonable fee based on administrative costs for any copy of the data you request.

Regarding the right to information, Atout France will not have the obligation to follow up on this, when you already have the information, for which you have requested the communication.

Atout France shall inform you if it cannot respond to your request.

Atout France would like to inform you that the non-information or the modification of your data may have consequences regarding the processing of certain requests within the framework of the execution of the contractual relations and that your request for the exercise of your rights will be kept for monitoring purposes. All the rights you have are detailed in the following article (2.7.2).

2.7.2 Your right to information

You acknowledge that this information notice informs you of the purposes, the legal framework, the interests, the recipients or categories of recipients with whom your personal data is shared and the possibility of a transfer of your data to a third country or international organisation.

In addition to this information and in order to guarantee fair and transparent processing of your data, you declare that you have received additional information concerning:

- the retention period of your personal data;
- the existence of your rights and the terms and conditions for their exercise.

If we decide to process data for purposes other than those indicated, all information relating to these new purposes shall be communicated to you.

2.7.3 Your right to access and rectify your data

You have a right to access and rectify your data, which you may exercise by contacting Atout France at the following address: contact.rgpd@atout-france.fr.

In this respect, you receive confirmation of whether your data is processed or not and when it is processed and have a right to access your data as well as information regarding:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients as well as the international organizations which the personal data has been or shall be communicated to, in particular the recipients established in third countries;
- where possible, the planned retention period for personal data or, when this is not possible, the criteria used to determine such period;
- the existence of the right to request the data controller for the rectification or erasure of your personal data, the right to request a restriction of the processing of your personal data, the right to object to this processing;
- the right to lodge a complaint with a supervisory authority;
- the information relating to the source of the data when it is not collected directly from the data subjects;
- the existence of automated decision making, including profiling and in the latter case pertinent information regarding the underlying logic, as well as the importance and the expected consequences of this processing for the data subjects.

You may ask us, depending on the case, for your personal data to be rectified or completed if this is inaccurate, incomplete, ambiguous or out of date.

2.7.4 Your right to request the erasure of your data

You may ask us for the erasure of your personal data when one of the following reasons applies:

- personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- you withdraw the consent, which you had previously given;
- you object to the processing of your personal data when there is no legal ground for such processing;
- the processing of personal data does not comply with the provisions of applicable laws and regulations;
- your personal data has been collected in the context of the company's offer of services to children under the age of 16.

However, the exercise of this right will not be possible when the retention of your personal data is necessary under the laws or regulations and in particular, for example, for the establishment, exercise or defense of legal claims.

2.7.5 Your right to the restriction on the processing of data

You may request the restriction of the processing of your personal data in the cases provided for by law and regulations.

2.7.6 Your right to object to data processing

You have the right to object to the processing of your personal data when the processing is based on the legitimate interest of the data controller or when the processing is necessary for the performance of an assignment in the public interest or relating to the exercise of public authorities.

2.7.7 Your right to the portability of your data

You have the right to the portability of your personal data.

The data on which this right may be exercised relates to:

- only your personal data, which excludes anonymized data or data which does not relate to you;
- declarative personal data as well as personal operating data mentioned above;
- personal data, which does not infringe the rights and freedoms of third parties such as those protected by business confidentiality.

This right is limited to processing based on consent or on an agreement as well as personal data you have personally generated.

This right does not include derived data or inferred data, which is personal data created by Atout France.

2.7.8 Your right to withdraw your consent

When the data processing that we carry out is based on your consent, you may withdraw it at any time. We shall then cease to process your personal data, without any prior operations for which you have given your consent being called into question.

2.7.9 Your right of recourse

You have the right to lodge a complaint with the Cnil (French data protection authority) on French territory without prejudice to any other administrative or jurisdictional recourse.

If you are a citizen of a country where Atout France offices are established outside France, you have the right to lodge a complaint with your national personal data protection authority.

2.7.10 Your right to set post-mortem directives

If you are a French citizen, you have the possibility of defining directives relating to the storage, the erasure and the communication of your personal data after your death through a certified trusted third party, in charge of ensuring that the will of the deceased is complied with in accordance with the requirements of the applicable legal framework.

2.8 Why is your data communicated to us?

Personal data of individuals or professionals who have shown an interest in France as a destination are communicated to us in the context of general interest assignments entrusted by the French state to Atout France on the basis of the law n° 2009-888 of the 22nd July 2009 on the development and modernization of tourist services.

Atout France has three main missions: to ensure the promotion of tourism in France both in France and abroad, to carry out tourism consultancy operations and to contribute to the policy of competitiveness and quality of tourism companies and destinations. Atout France is in charge of ensuring the quality of the offer thanks to several mechanisms: classification of tourist accommodation, Palace classification (*distinction Palace*) and registration of travel operators, Vignobles & Découvertes label.

Reference table for retention period of personal data of partners or clients or prospective clients

Category	Processing category or macro purpose (such use comes under the framework of Atout France's global activities)	Retention period by Atout France	Which category of person?
Investigations	Quantitative investigations	6 years	All
Investigations	Qualitative investigations	6 years	All
Events	Marketing	6 years	All
Events	Press events	6 years	All
Pro contact files	Catalogue –File Pro contacts	6 years	All
Statistical files	Web analysis	6 years	All
Cookies	Operation and analysis cookies	13 months	All
Trainings	Training management	Duration of contract + 6 years	Clients

File management: members' future client	Competitions	6 years	All
File management: members' future client	Marketing Competitions	Term of the agreement + 6 years	All
File management: members' future client	Emailing	Term of the agreement + 6 years	All
File management prospective clients	Management of applications to Atout France	6 years	All
Sales	On-line shop	6 years	All
Collective tourist accommodation	Classification and holding of the public register of classified accommodation	Duration of the public service assignment	All
Tour and holiday operators	Registration and holding of the public register of tour and holiday operators	Duration of the public service assignment	All
Palace classification and Vignobles & Découvertes Label	Review of applications	Duration of the public service assignment	All