

# PRIVACY & COOKIES POLICY

## RESATRAVEL

### *Privacy policy*

In the context of using its services and in particular the services accessible on its website and its mobile site, RESATRAVEL, as the data controller, is likely to collect and process personal data about you.

RESATRAVEL is committed to respecting the privacy of its passengers, prospects and visitors to its website and mobile site. All the personal data processing carried out in the context of the services available complies with the local regulations applicable to the protection of personal data and in particular the provisions of the amended "Data Protection Act" of 6 January 1978 and the General Data Protection Regulation (EU Regulation 2016/679).

In order to ensure that these rules are properly applied, RESATRAVEL has appointed a data protection officer who is the main contact for the French Data Protection Authority (CNIL). RESATRAVEL also implements appropriate internal procedures to raise awareness among its employees and to ensure compliance with these rules within its organization.

The Customer shall be solely responsible for the data communicated to RESATRAVEL and shall declare that the data provided during the visit is perfectly accurate. In accordance with Article 34 of the French law of 6 January 1978 relating to information technology, files and freedom, the Customer is informed that the personal information indicated as being compulsory on the forms and collected on the site is necessary for site usage. These informations are intended exclusively for RESATRAVEL and its contractual partners for the purposes of executing the present Conditions.

The personal database created during the Order process is confidential.

RESATRAVEL shall not be held liable for any "spam" suffered by Customers who have voluntarily and spontaneously decided to publish their e-mail address online. In accordance with the provisions of the French law on confidence in the digital economy of 21 June 2004, any data that may enable customers to be identified (and in particular IP addresses) that have contributed to the creation of content on the site shall be held and retained by RESATRAVEL.

Non-personal statistical data (e.g. number of unique visitors, average number of pages viewed per Customer) are analysed by RESATRavel to learn about the usage habits of the Site in order to improve the editorial and community content.

### **Our commitments in terms of personal data protection**

RESATRavel undertakes to guarantee a high level of protection for the personal data of its customers, prospective customers, users of its website and mobile site and any other person whose personal data it processes.

RESATRavel undertakes to comply with the regulations applicable to all personal data processing that it implements. More specifically, RESATRavel undertakes to respect the following principles :

- Your personal data is processed lawfully, fairly and transparently (**lawfulness, fairness, transparency**).
- Your personal data is collected for specified, explicit and legitimate purposes and is not further processed in a way that is incompatible with these purposes (**purpose limitation**).
- Your personal data is kept adequate, relevant and limited to what is necessary for the purposes for which it is processed (**data minimization**).
- Your personal data is accurate, kept up to date and all reasonable steps are taken to ensure that inaccurate data, having regard to the purposes for which it is processed, is erased or rectified without delay (**accuracy**).

RESATRavel shall implement appropriate technical and organizational measures to guarantee a level of security appropriate to the risk inherent in its processing operations, to meet regulatory requirements and to protect the rights and data of the persons concerned from the outset of the processing operations.

Furthermore, RESATRavel contractually imposes the same level of personal data protection on its subcontractors (service providers, suppliers, etc.).

Finally, RESATRavel undertakes to respect any other principle that is required under the regulations applicable to the protection of personal data, and more specifically concerning the rights conferred on the persons concerned, the duration of the storage of personal data and the obligations relating to cross-border transfers of personal data.

## **Why is this data likely to be collected by RESATRAVEL ?**

### **1. Means of collecting your data**

In the context of our exchanges, you may communicate your personal data to us by various means, and in particular on our websites and mobile sites when you browse the Internet, make purchases, make reservations, fill in the various collection forms, when you make any contact with RESATRAVEL or when you send us your personal data in any other way.

### **2. Purposes of processing and legal bases**

Your data is mainly used for booking and purchasing tickets, providing specific services: transport services, statistical studies, after-sales service, processing your requests and/or complaints, but also to ensure the safety and security of flights and to fight against fraud. The processing of your data for the various purposes mentioned above is necessary in particular:

- to ensure the execution of the transport contract,
- to comply with a legal obligation (in particular to ensure the safety of flights, to accomplish the compulsory immigration formalities with the French or foreign public authorities...),
- for the purposes of the legitimate interests pursued by RESATRAVEL (in particular to develop new services and offers, improve customer service, etc.).

More specifically, your data is used :

- to enable you to benefit from all the services available on the RESATRAVEL website and its mobile site: reservation management, assistance and complaints,
- to enable you to navigate on our websites,
- to match our information, notifications and other services to your interests,
- to facilitate the completion of administrative formalities relating to immigration and entry into the territory, to prevent non-payment and to combat fraud, and to ensure the safety and security of flights.

## **Our commitments to the protection of personal data**

### **1. Recipients of your data**

The data collected on the RESATRAVEL website and its mobile site may be communicated to its partners (transporters, credit card companies, etc.) or to its ancillary service providers (insurers), in the context of the performance of all or part of the services referred above. We remind you that in this context, RESATRAVEL requires its service providers to implement strict confidentiality and data protection measures.

## **2. Transfer of data outside the European Union**

Some of the above-mentioned recipients may be established outside the European Union and may have access to all or part of the personal information collected by RESATRAVEL (surname, first name, passport number, travel details, etc.) for the purpose of executing the transport contract or because of a specific legal entitlement.

### **How to exercise your rights ?**

In accordance with the regulations applicable to the protection of personal data, you may, at any time, exercise your rights of access, rectification, deletion of data concerning you as well as your rights of limitation and opposition to the processing and portability of your personal data.

In addition, you have the legal right to define directives concerning your personal data post mortem.

Furthermore, any person who was a minor at the time of collection of his or her personal data may obtain its deletion as soon as possible.

These rights can be exercised by mail to the following address :

VLC TRAVEL Data Protection Officer  
73 ter, rue Francis de Pressensé  
69100 Villeurbanne  
France

Email : [Rgpd-dpo@resaneo.com](mailto:Rgpd-dpo@resaneo.com)

In this context, we kindly ask you to add to your request the elements necessary for your identification (surname, first name, e-mail) as well as any other information necessary to confirm your identity.

You also have the right to appeal to the Commission Nationale de l'Informatique et des Libertés (CNIL) in case of violation of the regulations applicable to the protection of Personal Data and in particular the RGPD.

When you contact our customer service department, your call may be recorded for the purpose of improving service quality, preventing disputes and malicious calls. If you do not wish to be recorded, please notify the consultant directly.

The collection of certain personal data is essential to allow access to certain services or benefits (special meals, medical assistance, etc.). You may, of course, exercise your right to object to the collection and processing of this data, but this may make it impossible for you to benefit from these services or benefits.

In accordance with French and international laws and regulations, the failure to communicate or the inaccuracy of certain data may lead to a decision to refuse boarding or entry into a foreign country (for example, by decision of a customs service), without RESATRavel being held responsible.

## ***Cookies***

The Internet user is hereby informed that a cookie may be installed on his browser software when he visits the Site (a cookie is a block of data that does not allow the Internet user to be identified and that is used to record information relating to his browsing on the Site). The cookie generally contains an identification number or a code that will enable RESATRavel to recognize the customer when he returns to the site. The use of these systems enables RESATRavel to collect statistical data in order to improve the presentation of its Web site and to better meet the needs of Internet users. Browsers have functions that allow the user to refuse to accept cookies, to be warned before accepting them or to delete them. For more information on cookies and the various regulations mentioned above, Internet users can visit the CNIL website: [www.cnil.fr](http://www.cnil.fr).