

PRIVACY POLICY – GDPR

1) Who are we?

The company SAS APPART'CITY, registered with the RCS of Montpellier under number 490 176 120, with its registered office at 125, rue Gilles Martinet, 34077 MONTPELLIER (hereinafter referred to as "APPART'CITY"), is the data controller for the purposes described below.

Data Protection Officer:

APPART'CITY has appointed a Data Protection Officer (DPO). The email and postal contact details are as follows:

- dpo@appartcity.com
- DPO APPART'CITY – 125, rue Gilles Martinet, 34077 MONTPELLIER

2) Categories of collected data and sources

The processed data include identification data (name, first name, contact details, nationality, etc.), data related to your interests, email address, elements of personal life (marital status, number of children, etc...), elements of professional life, data related to customer reservations and payments, as well as data related to the diplomas and experiences of job applicants.

Information collected by APPART'CITY that is essential to fulfill the aforementioned purposes is marked with an asterisk on collection forms. If you do not provide this required information, APPART'CITY may not be able to provide the relevant service.

Your data is collected directly by APPART'CITY or may have been transmitted to us by our business partners (reservation centers, travel agencies, recruitment agencies, etc.). The personal data collected are kept by APPART'CITY in accordance with data protection regulations and the durations of legal requirements. For example:

- Data related to recruitment management are kept for a duration of 24 months;
- Data related to prospects are kept for 3 years from the last commercial contact;
- Data related to customers are kept for the duration of the contractual relationship plus the statutory prescription period.

3) Purposes and legal bases

The table below summarizes the purposes of personal data processing for which APPART'CITY processes your personal data:

PURPOSES OF THE PROCESSING	LEGAL BASIS
Carrying out commercial prospecting actions	Our legitimate interest or your consent if required by regulation
Recruitment	Our legitimate interest
Management of contact requests	Our legitimate interest
Booking data management	Performance of the contract between us
Recovery Data Management	Performance of the contract between us
Management of police records	Compliance with regulatory obligations
Management of commercial contracts (including the management of orders, payments and possible disputes)	Performance of the contract between us

Supplier Management	Performance of the contract between us
Management of access to rooms and reserved areas (badges/door locks)	The performance of the contractual relationship between us
Interest Tracking	Our legitimate interest or your consent if required by regulation
Management of a loyalty program and promotional operations	Our legitimate interest
Management of customer reviews and satisfaction surveys	Our legitimate interest
Litigation Management	Our legitimate interest and the performance of the contractual relationship between us

4) Recipients of the data

The personal data processed are primarily accessible to the Commercial & Marketing Department, the Information Systems Department, the Finance Department, and the Human Resources Department of APPART’CITY.

Your personal data may be communicated to Third Parties, Partners, and/or Subcontractors of APPART’CITY (external service providers for IT maintenance, for example) for the purposes outlined in this Policy. Subcontractors acting in accordance with APPART’CITY's instructions will be required to implement appropriate measures to protect this personal data. These entities include:

Cityzenbooking - D-Edge - Webhelp - Koédia - Contentsquare (Anonymous data) - ABTasty (Anonymous data) - Actito - Wihp - Google - Awin - Bing - Deebr - Qualitelis

If some Third Parties are located in countries whose regulations may not necessarily offer the same level of protection as those of the European Union Member States, APPART'CITY will ensure that these transfers are made in accordance with the provisions imposed by French regulations (such as the implementation of specific contractual clauses in accordance with the Standard data protection clauses (SCCs) adopted by the European Commission). You can contact our DPO at the following address: dpo@appartcity.com, to obtain more information on these topics and a copy of the relevant documents.

5) Security measures

APPART'CITY implements appropriate technical and organizational measures, in accordance with current legal requirements, especially Article 32 of the GDPR, to ensure the protection of your personal data against destruction, loss, alteration, misuse, unauthorized access, modification, or disclosure, whether these actions are unlawful or accidental. To this end, we have established technical measures, such as firewalls, and organizational measures, such as an identification/password system, physical protection devices, etc... to ensure the constant confidentiality, integrity, availability, and resilience of the systems and processing services. When you transmit information regarding your credit card during the reservation, a Secure Socket Layer (SSL) encryption protocol is used to secure your transactions, reinforced by organizational measures ensuring the security of processing.

6) Your rights

These rights can be exercised at any time by sending an email to the address dpo@appartcity.com or a letter to the following address: DPO APPART'CITY – 125, rue Gilles Martinet, 34077 MONTPELLIER.

You can also file a complaint with the National Commission for Information Technology and Civil Liberties (CNIL). Additional information is available on its website www.cnil.fr.

- You have the right to request access and rectification of your personal data;
- You have the right to request the limitation of the processing of your personal data, (i) if you contest the accuracy of your data during the period allowing us to verify the accuracy of this data, (ii) if you consider that we are processing your data unlawfully and you demand limitation of their use instead of deletion, (iii) if we no longer need your data for the purposes mentioned above but they are still necessary for the establishment, exercise, or defense of legal claims, (iv) in case of exercising your right to object during the verification period to determine whether our legitimate reasons prevail over yours;
- You have the right to request the deletion of your personal data. In the event of a request;

APPART'CITY

- You have the right to request, at any time, to exercise your right to object to processing carried out for reasons relating to your particular situation;
- You also have the right to object to commercial prospecting, without having to provide a reason;
- You have the option to register for free on the BLOCTEL telephone solicitation opt-out list (www.bloctel.gouv.fr) in order to no longer receive telephone solicitations from a professional with whom you have no ongoing contractual relationship, in accordance with Law No. 2014-344 of March 17, 2014, relating to consumer rights;
- You have the right to exercise the right to data portability, which entitles you to obtain a copy of your personal data or to transfer them to a third party in a structured, commonly used, and machine-readable format;
- You also have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;
- You have the right to withdraw your consent at any time;
- You also have the right to provide instructions regarding the storage, erasure, and communication of your personal data after your death.

In order to preserve the confidentiality and security of your personal information, it will be necessary to proceed with a preliminary identification in order to respond to your request. Therefore, if it is necessary to confirm your identity, we may ask you to provide a copy of an official identification document, such as an identity card or a passport, to support your request.

All requests will be processed promptly and in compliance with applicable law.