

COOKIE AND PERSONAL DATA PROTECTION POLICY

The PIERRE ET VACANCES - CENTER PARCS Group attaches the highest importance to protecting the privacy and personal data of its customers and individuals accessing its websites.

This cookies and personal data protection policy (hereafter the "*Policy*") aims to:

- (i) describe what types of personal data related to you the PIERRE ET VACANCES - CENTER PARCS Group and - if applicable - its Data Processors may collect, and
- (ii) to inform you about how your personal data is processed by the entities of the PIERRE ET VACANCES - CENTER PARCS Group, any partners and Data Processors they may have, and
- (iii) to inform you of your rights and of how you and the PIERRE ET VACANCES - CENTER PARCS Group can work together on your personal data.

All operations on your personal data are performed in compliance with the applicable regulations and in particular Regulation 2016/679 of the European Parliament and Council dated 27 April 2016 concerning the protection of physical persons with regard to the processing of personal data and the free circulation of this data (hereafter the "*Regulation*"), and any national legislation applicable to the protection of the data.

Without prejudice to the choices that are made available to you by these terms and conditions and by the Law, You acknowledge having been made aware of and accepting this Policy at the same time as having accepted the Site's General Conditions of Use.

If You disagree with these terms, You are free to not provide personal data. You are nonetheless warned that access to some of the Services is conditional upon the communication of some of this data - indicated by an asterisk - and that absent this communication, some functionality may be degraded.

ARTICLE 1 – DEFINITIONS

The following terms, beginning with a capital letter, shall have the following meaning:

- "**Personal data (or PD)**", "**Special categories of data**", "**Process/processing**", "**Data Controller**", "**Data Processor**", "**Data Subject**" have the same meaning as in Regulation (EU) 2016/679 of the European Parliament and Council dated 27 April 2016 concerning the protection of physical persons regarding the processing of personal data and the free circulation of this data;
- "**PIERRE & VACANCES CENTER PARCS Group**" designates all of the legal entities operating the following brands: Pierre & Vacances, Pierre & Vacances Premium, Pierre & Vacances Villages Clubs, Maeva, Aparthotel Adagio, Aparthotel Adagio access, Center Parcs, Sunparks, Pierre & Vacances Conseil Immobilier, Center Parcs Conseil Immobilier, les Senioriales, Village Nature, la France du Nord au Sud.
- "**Processing of personal data**" designates any operation or set of operations performed with or without automated procedures and applied to personal data or sets of personal data, such

as collection, registration, organisation, structuring, retention, adaptation or modification, extraction, viewing, use, communication by passing on, distribution or making available in any other form, link or interconnection, limitation, erasure or destruction;

- **"Personal data file"** means any structured and stable set of personal data accessible according to specific criteria, whether this set is centralised, decentralised or distributed in a functional or geographic manner;
- **"Partner"** designates a third-party company with which the Data Controller having collected the data has concluded an agreement to make data available for the purposes of processing for the benefit of this third-party company; these companies may send you additional proposals to subscribe to commercial offers, within the limits authorised by the Law.
- **"Service"**: designates a service offered by an entity of the PIERRE ET VACANCES - CENTER PARCS Group or one of its partners
- **"Company"**: designates the entity of the PIERRE & VACANCES CENTER PARCS Group whose details appear on the Legal information as publisher or having issued the data collection form.
- **"Site"**: designates a website of one of the entities of the PIERRE & VACANCES CENTER PARCS Group.

ARTICLE 2 - FIELD OF APPLICATION

In addition to their principal, traditional activities of tourism and property, or to enable their objectives to be achieved, some entities of the PIERRE & VACANCES CENTER PARCS Group may engage in e-commerce activities.

ARTICLE 3 - Processing of personal data

Within the context of operating its Site, the Data Controller responsible for processing collects data about You.

a) Legal basis of processing

The processing is based on either (i) the consent of the individuals concerned, (ii) (a) the set-up and execution of a contract or (b) pre-contractual measures at the request of the individual concerned, or (iii) the need to satisfy the legitimate interests of the PIERRE ET VACANCES - CENTER PARCS Group.

b) Purposes

- *(i) With the consent of the User or Customer, the personal data concerning them is collected and processed for the purposes of:*
 - Sending free informational newsletters and measuring click rates on the links included in the newsletters,
 - Contact details update allowing the lease execution,
 - Drawing up statistics and measurements of how frequently Services are used;
 - Passing on, free of charge or at cost, to all of the entities of the PIERRE ET VACANCES - CENTER PARCS Group, as well as all of its partners, for the purposes of direct marketing and commercial solicitation, by any communications channel.

The data that is collected and processed because it is necessary for the execution of a contract or taking pre-contractual measures may also be used for the purposes stated above, the User having consented to this by ticking the box intended for this purpose.

In addition, the entities of the PIERRE ET VACANCES - CENTER PARCS Group may collect personal data for other purposes, taking care to obtain the prior and detailed consent of the individuals concerned.

Generally, the consent of User or Customer is indicated by ticking the boxes, provided for this purpose, when registering for the Services, or later.

Consent can be withdrawn at any time. The withdrawal of consent has no retroactive effect on the lawfulness of the processing carried out on this basis, prior to the said withdrawal.

- *(ii) In the context of the execution of a contract or taking pre-contractual measures at the request of the individual concerned, the personal data is collected for the purposes of:*
 - The reservation and tracking of a stay and/or activities;
 - Payment for reserved products and services;
 - The management of notices, surveys and polls of Users and customers on the Services or content of the Site and the Applications.
 - Restoring a shopping basket that has not yet been confirmed or whose payment did not complete;
 - Setting up or accessing an account for a customer allowing them to update their personal information, view or modify information about a stay or reserve additional services;
 - Setting up a Customers file to track and perform the services of the PIERRE ET VACANCES - CENTER PARC Group entities or their Data Processors and third-party entities responsible for delivering the promised service;
 - Performing customer satisfaction surveys after stays
 - Contact from a customer relationship representative

- *(iii) In the context of a legitimate interest of the Data Controller, the personal data is collected and processed to allow it to ensure the continuity of service and the sustainability of the activity of the entities of the PIERRE ET VACANCES - CENTER PARCS Group:*
 - Any other purpose that may appear legitimate, on the condition that fundamental rights and liberties are respected

c) Data processed

Prior to collecting data, the User will be informed if the personal data requested must be filled in or if it is optional.

Data identified with an asterisk inside a registration or collection form is mandatory. If not provided, access to the Services and their use by the individual concerned will be impossible or a request associated with a form will not be able to be satisfied.

The rest is optional and not supplying it will not affect the delivery of the services promised or responses to requests for information, although it may limit their relevance.

In particular, the entities of the PIERRE ET VACANCES - CENTER PARCS Group may collect the following data from you:

- **Identity:** family name, given names, address, telephone number (fixed-line or mobile), fax number, email address, date of birth, internal processing code enabling customer identification (this internal processing code is distinct from the registration number in the national identification directory of physical persons, the social security number and the bank card number); And, for employment applications, professional experience, diplomas and skills.
- **Data about means of payment:** postal ID or bank statement, transaction number, cheque number, bank card number, third-party financing
- **Data related to the commercial relationship:** requests for documentation, requests for trial, products and services reserved and bought, quantity, amount, periodicity, delivery address, purchase history, source of the sale (vendor, representative) or the order, correspondence with the customer and after-sales service;
- **Data about invoice payments:** settlement methods, agreed discounts, information about loans taken out (amount and duration, name of the lending organisation), received, unpaid, reminders, balances;
- **Contact data:** the correspondence exchanged, date and time of the messages
- **Data about newsletter subscriptions:** family name, given names, email address
- **Visitation statistics:** IP address, cookies, for example, the pages viewed by the user, the date and time they were viewed (see detailed information about cookies below).

Geo-location may be set up on mobile applications with the consent of the user. The data will not be retained once the site is left. The user can deactivate geo-location at any time. Depending on the services offered, deactivation may disrupt operation of the application.

Under all circumstances, the entities of the PIERRE ET VACANCES - CENTER PARCS Group undertake to process all of the data collected in compliance with the applicable regulations and in particular Regulation 2016/679 mentioned previously.

d) Recipients of the data collected – provision of the data to third parties

- The personal data collected on a Site or a form is intended for the publisher of the Site or the issuer of the Form (whose details appear in the Legal Information or whose identity is specified on the data collection form) and, if appropriate, the official organisations and administrative or judicial authorities in the cases anticipated by the Law.

If the entities of the PIERRE ET VACANCES - CENTER PARCS Group entrust the data processing to Data Processors to provide the services, the latter will, in particular, be chosen for their capacity to present adequate guarantees regarding implementation of the appropriate technical and organisational measures, particularly in terms of reliability and security measures.

- Nevertheless, the personal data collected on a Site or a form – including data which had to be communicated for execution of a contract or to take pre-contractual measures and which the Data Subject consented to see used for other purposes (in particular direct marketing and promotions for other activities) by the same Data Controller - may, with the express and prior consent of the Data Subject, be sent or made available to other entities within the PIERRE ET VACANCES - CENTER PARCS Group as well as their commercial Partners. This consent may be withdrawn at any time.

e) Transfer of Data to authorities and/or public organisations

In compliance with the applicable regulations, the data may be sent to the competent authorities on request and in particular to public organisations, exclusively to meet legal obligations, to representatives of the law, ministerial officers and organisations responsible for the recovery of debts.

f) Abroad transfer of Data

- (i) In relation to a reservation for a destination offered by the PIERRE ET VACANCES - CENTER PARCS Group located within the European Union, the data communicated will not be transferred outside the European Union, in the absence of any legal obligation.
- (ii) In relation to a reservation for a destination offered by the PIERRE ET VACANCES - CENTER PARCS Group located outside the European Union (particularly China), data transfers may be carried out. To guarantee that the stay and the reserved activities take place as they should, and strictly within the framework of the reservation contract to which the Data Subject is a party, the data will be sent or made available to the local entity of the PIERRE ET VACANCES - CENTER PARCS Group managing the destination site. All the technical and organisational measures required have been put in place to ensure the security and protection of the data.

g) Retention periods

The entity or entities of the PIERRE ET VACANCES - CENTER PARCS Group involved in the processing store your personal data in a secure environment for the time necessary to achieve the purposes for which it is processed, plus the period indicated below or, otherwise, what can be determined from the applicable laws or regulations, particularly civil and commercial limitation period.

These periods may differ according to the national requirements of the country in which the entity or entities of the PIERRE ET VACANCES - CENTER PARCS concerned is/are located.

Some personal data may be retained for longer periods exclusively for archiving purposes, in the public interest, for the purposes of scientific or historical research or for statistical purposes. In the latter cases, the data will then be anonymised.

Regarding the periods:

- Data associated with stays is retained throughout the duration of the contractual relationship, then archived for 5 years counting from the end of the subscription or the purchase. Invoices are retained for 10 years.
- Data processed within the context of direct marketing operations for which you have given your agreement shall not be retained for more than 3 years after the last contact from you; it will be deleted when you indicate an objection to its use.
- Information about competitions is retained for the competition period.
- Data associated with requests for information, without a current contract, is retained for the time required for a response, plus a maximum period of 6 months.
- Your bank card information is not retained beyond the time of the transaction unless you have consented to it being stored.
- Information about employment applications is retained for a maximum of two years.

h) Social networks

If You have a social network account and You access the Site or the Applications without previously having signed up for the Services, the Publisher may receive information from the said social networks to facilitate the creation of an account on the Site or the Application.

When You use a Service via a social network, You allow the Publisher to access some information that you have provided to the social network, in particular your user name, your surname and forename, your profile image and your data about the use of this Service. By accessing a Service via a social network, You authorise the Publisher to collect, store and use all information that You have authorised the social network to provide to the Publisher.

ARTICLE 4 – PROTECTION OF THE PERSONAL DATA OF JUVENILES

The PIERRE ET VACANCES - CENTER PARCS Group neither collects nor retains personal data related to juveniles below 16 years of age without obtaining ascertainable parent consent, recognizing that the those in possession of parental authority may ask to receive the information about their child and request its deletion. This age of consent may differ depending on the country in which the entity of the PIERRE ET VACANCES - CENTER PARCS Group is located.

ARTICLE 5 - COOKIES

The User has been informed that, when connecting to Sites or Applications and during use of the Services, cookies or other technologies are used, subject to the choices expressed by the User. These choices may be changed at any time, by configuring the browser settings, as indicated below.

A cookie allows its issuer, during its period of validity, to recognise the device concerned (computer, tablet, smartphone, etc.) each time the device accesses digital content including cookies from the same issuer. A cookie stores information about your computer's navigation of our website (the pages you viewed, the date and time they were viewed, etc.) which we will be able to read during subsequent visits.

These cookies facilitate navigation and make the website more user-friendly.

Under this circumstance, access to some sections and services of the site may be different, or impossible.

1) Types of cookies:

a) Cookies that are strictly necessary: navigation cookies

Navigation cookies allow the performance of the Services to be improved in order to create a better experience of using the Site and Applications for the User.

These cookies are essential in that they allow you to move around our websites and use their functionality (for example, they allow you to access secure zones of our websites). Without these cookies, the services you have requested (such as search) cannot be provided to you:

These Cookies do not require prior notification of the User or prior agreement from the User to be stored on the User's device

More precisely, these Cookies allow, in particular:

- ✓ To adapt the presentation of the Site and the Applications to the display preferences of the device (language used, display resolution, operating system used, etc.) when Users visit the Site and the Applications, depending on the equipment and the display or reading software that the device has;
- ✓ To allow access to a reserved space subject to a login and password;
- ✓ To save information about the form the User has filled in on the Site and Applications or information that the User has chosen on the Site or Application;
- ✓ To offer the User access to his or her account, particularly but not limited to, the shopping basket, their payments, order history, or any other space reserved for customers based on their login credentials;
- ✓ To implement security measures, for example when the User is asked to re-connect to an item of content or a Service after a certain time has elapsed.

Strictly necessary cookies deployed:

Domaine propriétaire.groupepvcp.com & propriétaire.villagesnature.com	
Cookie	Description
has_js	Necessary cookie for the operation of the automated social media manager Drupal
Drupal.tableDrag.showWeight	Necessary cookie for the operation of the automated social media manager Drupal

b) Google Analytics and privacy – "DO NOT TRACK" function

This website uses a web analysis service provided by Google Inc ("Google"). The information about your use of this site generated by the cookies is sent to a Google server in the United States and stored there. Google uses this information to evaluate your use of the website, in order to compile reports on the website activity for the operators of the website and to provide other services associated with use of the website and use of the internet. Google will also send this information to third parties when appropriate if the law requires it or if this data is processed by third parties on Google's behalf. Google will use this information to evaluate your use of the website, author reports on the website activities on behalf of its operators and provide other services associated with the use of this site and the internet. Google will also send this information to third parties when appropriate if the law requires it or if this data is processed by third parties on Google's behalf. Under no circumstances will the IP address be associated with other Google data.

Users can deactivate cookies by changing their browser settings. You can also activate the "DO NOT TRACK" function on your browser.

For Google Chrome

- 1) Open the Chrome menu (icon on the top right with three horizontal lines)
- 2) Click "Settings";
- 3) Scroll the page down and click "Advanced";
- 4) In the Privacy and security section, tick the option "Send a "Do Not Track" request with your browsing traffic".

- 5) Click "OK" in the window that opens to confirm your choice.

For Mozilla Firefox

- 1) Open the Firefox menu (icon on the top right with three horizontal lines)
- 2) Click on "Options"
- 3) Go to the "Tracking protection" part of the Privacy & Security section then tick "Send web sites a "Do Not Track" signal that you don't want to be tracked".

For Internet Explorer

- 1) Open the Internet Explorer menu (icon on the top right in the form of a toothed wheel)
- 2) Click "Internet options";
- 3) In the window that opens, click the "Advanced" tab
- 4) Scroll down till you find the option "Send Do Not Track requests to sites you visit in Internet Explorer" and tick it.
- 5) Confirm your choice by clicking "OK".

For Opera

- 1) Open the "Customize and control Opera" menu (icon in the top left corner)
- 2) Click "Settings";
- 3) Open the "Privacy & security" section then
- 4) Tick "Send a 'Do Not Track' request with your browsing traffic".
- 5) Click "OK" in the window that opens to confirm your choice.

If the "DO NOT TRACK" option is activated, no information will be collected to draw up your profile: yourself and your device will not be traced.

Cookie	Description
Google Analytics	<p>Google stores cookies from our websites to analyse how our websites function and how the user moves on the websites. This information then allows us to make changes to our websites to improve your online experience. The cookies that Google stores also help us evaluate the effectiveness of our advertising campaigns.</p> <p>The Google Analytics cookies are __utma, __utmb, __utmc, __utmv, __utmz, and __utmx.</p> <p>Examples:</p> <p>__utma is a persistent cookie that expires 2 years after its last update,</p> <p>__utmb is used to track the user's page views on your site,</p> <p>__utmz keeps a record of the entry point into our websites.</p>

2) Cookies subject to consent

Some cookies are subject to consent. By continuing to browse the site or use its functionality, the User consents to the placement of cookies. He or she may also exercise or withdraw their consent by clicking on the homepage.

I accept the placement and reading of cookies so that I am offered personalised advertising:

Yes No

I accept the placement and reading of cookies for the purposes of audience analysis of the website:

Yes No

I accept the placement and/or reading of cookies for the purposes of sharing site content (e.g. "Like" buttons on Facebook):

Yes No

If your browser allows it, you can also object to the storage of cookies by configuring your browser settings, as indicated below:

3) Rejecting cookies

Users can configure their browsing software so that cookies are stored on the device or, on the contrary, so that they are rejected, either systematically, or depending on their issuer. Users can also configure their browser software so that the acceptance or rejection of cookies is proposed intermittently, before a cookie is stored in their device.

For management of Cookies and User choices, the configuration of each browser is different. It is described in your browser Help menu, which provides information about how to modify your cookie preferences:

Internet Explorer:

1. Click the Tools button, then Internet Options.
2. In the General tab, beneath Browsing history, click Settings.
3. Click the "View files" button.
4. Click the "Name" column header to sort all the files into alphabetical order, then go through the list till you see files starting with the prefix "Cookie".
5. Select all of them or only the cookies including the name "XXXX" and delete them
6. Click twice on OK

Firefox:

1. Click the Tools button, then Options.
2. Choose Privacy & Security and select Show cookies

3. Tick the cookies and click Delete now.

Google Chrome 4, Google Chrome 8 and above:

1. Choose the Tools menu, then Options.
2. Click the Advanced options tab.
3. Find the Content Settings section.
4. Tick Block all sites from storing data.

Safari:

1. Choose the Safari menu, the Preferences in the Edit menu.
2. Click the Security tab, then select the level of confidentiality desired.

Netscape Navigator 9.0:

1. Choose the Tools menu, then Options.
2. Click the Privacy tab.
3. Untick Accept cookies from sites.

Opera:

1. Choose Menu, then Settings.
2. Click the Preferences tab.
3. Select Advanced, then Cookies.
4. Tick Never accept cookies.
5. Tick Delete new cookies on leaving Opera and click OK.

If applicable, the user is informed that under this circumstance, access to some sections and services of the site may be different, or impossible.

Users can choose to express or modify their cookie preferences at any time.

Finally, the user can visit the site Youronlinechoices, offered by digital advertising professionals within the European association EDAA (European Digital Advertising Alliance) and managed in France by the Interactive Advertising Bureau France.

This allows the User to get to know the companies registered on this platform and which offer the possibility of refusing or accepting the cookies used by these companies to adapt the advertising that may be displayed on the User's device to his or her browsing information: <http://www.youronlinechoices.com/fr/controler-ses-cookies/>. Bottom of form

The retention period of the cookies varies depending on the cookie type. We mainly use cookies that erase themselves once the connection is over. These are called "session or browsing" cookies.

A log file also allows us to keep track of the history of all accesses to our web pages or the download of different files available on our sites, for a period of 6 months. Finally, information about your consent to cookies is retained for a maximum period of 13 months.

The cookies are used for internal purposes and are not accessible by third parties.

ARTICLE 7 - RIGHTS OF INDIVIDUALS

In compliance with the Regulation (EU) 2016/679 concerning the protection of personal data, You have the right to ask the Data Controller for access to the personal data that relates to You, the rectification or erasure of this data (right to be forgotten), or a limitation of the processing of your personal data and the right to the portability of this data.

You can also object to the processing of data that relates to You for reasons pertaining to your own particular situation.

For data not indicated as mandatory and which You have consented to provide and have processed, You have the right to withdraw your consent: the withdrawal of consent has no retroactive effect on the processing that has been carried out on this basis, prior to the said withdrawal.

You have the same right and under the same conditions in relation to the data indicated as mandatory during its collection and which You have authorised us to process for purposes other than the execution of the contract to which you are a party or the performance of pre-contractual measures taken at your request. They will then remain processed, as the case may be, solely for the purposes of the performance of the contract or in the other cases provided for or authorized by the Law.

These rights are described more fully on the website of the CNIL: <https://www.cnil.fr/fr/comprendre-vos-droits>.

You may also have additional rights provided by your national legislation, such as the definition of directives related to the retention, erasure and communication of your personal data after your death.

Regarding telephone canvassing, you have a specific right of objection by subscribing to the BLOCTEL list.

To exercise your rights, you can contact the customer service department of the company you dealt with initially, by email or mail addressed to the company's registered office, as it appears in the "Legal information" section.

For any communication regarding your rights or the processing of your data and to allow rapid processing of your request, please indicate your family name, given names, address and customer number or case number if you have one, as well as any valid proof of ID (particularly CNI, passport, residence card) to be send exclusively by mail.

You also have the right to file a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL)(www.cnil.fr) or the Monitoring Authority within your place of residence.

ARTICLE 8 – SECURITY MEASURES

Taking into account the development of technology, implementation costs, the nature of the data to be protected as well as the risks to the rights and liberties of people, the PIERRE ET VACANCES - CENTER PARCS Group uses all appropriate technical and organisational measures to ensure the confidentiality, integrity, availability and robustness of the personal data collected and processed as well as a level of security tailored to the risk.

In particular, to guarantee your security and ensure greater confidentiality, the websites use the encryption protocol SSL (Secure Socket Layer) 128 bits.

During transfer of the information on the network, your bank card number, as well as all information entered in the different forms, is encrypted automatically. The SSL encryption system allows the information to be encrypted automatically before its transmission on the network. Once it has arrived on our server, the bank data will be decrypted automatically using a unique SSL key that allows your browser to establish a connection with our website and to transparently negotiate a secure communications channel.

ARTICLE 9 - MODIFICATIONS TO THE COOKIES AND DATA PROTECTION POLICY

If this Policy is modified by the PIERRE ET VACANCES - CENTER PARCS Group, or if legal or regulatory texts require it, the modified version will be published on our websites and will be effective upon publication.

We therefore ask you to refer to it each time you visit so you will be aware of the latest version, available permanently on our websites.