



# Privacy Policy

## 1. General

The Hotel Lepoussin, owned by HCC SAS company (with its registered office at 72, descente des Périades 74400 Chamonix Mont-Blanc, France) that is responsible for processing data, places great importance on protecting and respecting your private life. We do not sell or hire out your personal data. We collect, store and process such data in accordance with legal provisions, in particular, law No. 78-17 of 6th January 1978, (EU) regulation 2016/679 of the European Parliament and Council of 27th April 2016 relating to the protection of private individuals with respect to processing personal data and to the free circulation of such data, and repealing directive 95/46/EC (General Data Protection Regulation) and any implementation provisions that may be made.

The purpose of the present policy is to provide you with information on our practices relating to the collection, use and distribution of data, which you are requested to supply through our platform (the Platform), that can be accessed from the website [www.lepoussinhotel.com](http://www.lepoussinhotel.com), or our mobile applications.

This Privacy Policy specifies the data we collect and the purpose for which we process them when you use the services we deliver. This Privacy Policy also contains important information regarding the protection of your data, especially your rights concerning this. We would like to ask that you read this document through carefully so that you are aware of and understand our practices regarding the processing of your personal data.

## 2. The information we collect

The personal information that the Hotel Lepoussin, owned by HCC SAS company, has to process and relates to you, is the result of a reservation you made with our hotel or for the purpose of sending you documentation:

### 2.1 Information you send us directly

By using our Platforms, you have to send us information, some of which identifies you ("Personal data"). This is the case, in particular when you fill in forms (such as the online pre-registration form or the check-in form), when you take part in one of our games, competitions, promotional offers, surveys or questionnaires, when you contact us – whether by telephone, e-mail or any other means of communication – or when you notify us of any problem.

This information contains the following data, in particular:

2.1.1 The data required to book a stay at the Hotel Lepoussin, owned by HCC SAS company. These data essentially contain your surname and first name, e-mail address and country of residence. This information is mandatory. Failure to provide this information means that the Hotel Lepoussin, owned by HCC SAS company, will be unable to provide you the services we offer.

2.1.2 Online pre-registration. After having booked a stay you may add a little more information about yourself and/or the persons accompanying you:



- Postal address
- Birthday
- Telephone number
- Anticipated time of arrival at the hotel
- Type of transport anticipated for arrival at the hotel
- Flight / train reference
- Airport, railway station of arrival

- 2.1.3 A copy of all correspondence between you and the Hotel Lepoussin, owned by HCC SAS company.
- 2.1.4 A copy of all reservations made on our platforms.
- 2.1.5 The breakdown of financial or accounting operations carried out on our platforms or by any other means, containing in particular, information relating to the payment card, bank details, information relating to the bookings made or in which you expressed an interest.
- 2.1.6 The breakdown of your visits to our platforms and the contents you gained access to.
- 2.1.7 Where applicable, your replies to our surveys and questionnaires and the comments you made regarding your stay – this information in particular, is likely to be used for researching and analysing the behaviour of the user.
- 2.1.8 A copy of the passport, driving licence, identity card or any other similar documents, which the client agreed to provide us with.
- 2.1.9 You can object to telephone canvassing by registering with the free government service [bloctel](https://bloctel.gouv.fr/).

## 2.2 Information we collect indirectly through our partners

If you make a reservation through a third-party platform, the operator of the platform sends us Personal Information. In principle, this is the data given in 2.1.2 above. We process these data to enter your booking in accordance with your request and to provide the services booked. The operators of the partner platforms also send us data concerning the booking process, for which a copy of the booking confirmation can be used as proof. Please also read the Privacy Policy of the respective providers.

When making a reservation, our bank service provider collects personal data concerning your means of payment (name, first name, e-mail, phone number, credit card number, card expiry date, security code, etc.). This data allows us to validate the payment specific to your reservation. We keep these bank details for 15 months. They are used to cover limitation periods in the event of a dispute over a transaction. In accordance with current regulations, we never keep the visual cryptogram. You can send us a request to delete this data at any time.

## 3. Why we process your data

These data are required for the following processing operations:



- Receipt of documents about the hotel and/or its group
- Receipt of e-mail follow-up for purposes of determining satisfaction and/or market research
- Improving our follow-up and client services
- Online service reservation
- Processing statistics
- Compliance and management of our hotel
- Lost and Found Service

This information contains the following data, in particular:

- 3.1 Market the services offered for sale: this processing is essential to execute our respective contractual obligations.
- 3.2 Check your identity and personal data: this processing is based on your consent, which is essential for us to comply with our statutory obligations.
- 3.3 Send you information about our services (such as reservation confirmations) by e-mail, SMS or any other means of communication: this processing is essential to execute our respective contractual obligations and/or is performed with the consent of the final client.
- 3.4 Receive your payments: this is necessary to execute our respective contractual obligations.
- 3.5 Send you marketing, advertising and promotional material in compliance with pertinent statutory provisions. You also agree to us personalising the contents of the promotional e-mails based on your requirements and interests. You may withdraw your consent to receive future publicity e-mails at any time to the e-mail address indicated by clicking on the "unsubscribe" link at the bottom of the publicity e-mail.
- 3.6 Assess the efficiency of advertising material we send and adapt it to the receivers. This data processing is based on your consent.
- 3.7 Manage our platforms and proceed with internal technical operations to resolve problems, analyse data, carry out tests, research, analyses, surveys and questionnaires. This processing is based on our legitimate interests (ensuring the security of our platforms and improving their properties).
- 3.8 Improve and optimise our platforms, in particular ensure that displays of our contents are adapted to your equipment. This processing is based on our legitimate interests (in supplying you with pertinent and adapted content).
- 3.9 Send you back your personal items left in our establishment at your request.

#### **4. Who are the recipients of the information we collect and why are we sending them this information?**

- 4.1 The Hotel Lepoussin, owned by HCC SAS company, may call upon external service providers which carry out a certain amount of data processing on our behalf and on our instructions (sub-contractors). The Hotel Lepoussin, owned by HCC SAS company, selects its sub-contractors with the utmost diligence, in compliance with current data protection laws and complies with the provisions of the written agreement and other legal requirements when processing orders at the time these are issued.

The operations performed as part of our order include:



- Making available the technical infrastructure of the platform and providing storage space
- Trust in and the security of the platform (such as fraud prevention)

Our authorised sub-contractors may have access to your personal data but are only allowed to use them to process the data transferred and not for any other purposes. The sub-contractors are contractually obliged to guarantee a level of data protection that corresponds to our own. All the data processed at our request undergo our inspection. We continuously monitor compliance with our instructions, contract agreements with our sub-contractors and guarantee the levels of data protection.

4.2 In the event that we sell or acquire a company or assets, we reserve the right to share your personal data with the potential seller or buyer of this company or assets.

4.3 If the Hotel Lepoussin, owned by HCC SAS company, or all or part of its assets are purchased by a third party, then the data in our possession may, if applicable, be transferred to the new owner.

## **5. Divulging your data to third parties**

The Hotel Lepoussin, owned by HCC SAS company, will share the data with other entities of the Assas Hotels group. In accordance with legal provisions, the Hotel Lepoussin, owned by HCC SAS company, is duty-bound to transmit any personal data and/or data used to any investigating authorities, legal proceedings and supervisory authorities if, and to the extent this is necessary to prevent interference with public security and to conduct criminal proceedings.

## **6. Use and acceptance of cookies:**

6.1 When you gain access to our platform, we shall also obtain your approval, prior to installing additional cookies on your equipment, by displaying a cookie banner, which you must approve. These cookies are not absolutely essential for the operation and performance of our platform but they help us to see how many visitors attend the platform and how they move around on it. This helps us improve the functioning of our platform, for example, by ensuring that the users can easily find what they are looking for (analytical/performance cookies).

A cookie banner shows you why we use cookies. By continuing to use our platform, following the display of the cookie banner, you agree to our use of cookies for the purposes indicated above ("Agreement to use cookies").

6.2 What to do if you do not wish to activate cookies?

You can withdraw your agreement regarding the use of cookies at any time, by parameterizing your internet navigator as follows:

If you want to delete the cookies recorded on your terminal and parameterize your navigator to refuse cookies, you can do this via the preferences of your internet navigator. These navigation options concerning cookies are usually found in the "Options", "Tools" or "Preferences" menus of the navigator you use to access this site. However, various means may be used to deactivate cookies, depending on the different navigators. To find out more, click on the reference links below:



- Microsoft Internet Explorer: <https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>
- Google Chrome: <https://support.google.com/accounts/answer/61416?hl=fr>
- Safari: [https://support.apple.com/kb/PH19214?locale=fr\\_FR&viewlocale=fr\\_FR](https://support.apple.com/kb/PH19214?locale=fr_FR&viewlocale=fr_FR)
- Firefox: <https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences?redirectlocale=fr&redirectslug=activer-desactiver-cookies>
- Opera: <http://help.opera.com/Windows/10.20/fr/cookies.html>

Please note that if you do not agree to the use of cookies on your terminal from your internet navigator, you can still navigate this site but some sections and options may not function correctly.

6.3 Our sites use Google Analytics, a Google Inc. web analysis service ("Google"). Google Analytics uses "cookies", which are text files located on your computer to help in analysing the use of the website by users. The information generated by the cookies regarding your use of this website is generally transferred to a Google server in the United States, where it is stored. We activated the anonymisation of the IP address on our platform so that your IP address is previously abbreviated by Google in the member states of the European Union or in the other states that have signed the Agreement on the Economic European Area. It is only in highly exceptional cases that the complete IP address will be sent to a Google server in the United States where it will be abbreviated. Google will use this information on behalf of the Hotel Lepoussin, owned by HCC SAS company, to assess your use of the websites, in order to compile reports on the activity of the site and to offer other services associated with the use of the website and internet to Assas Hotel. The IP address sent by your navigator under Google Analytics is not merged with other Google data. You can refuse the use of cookies by selecting the appropriate parameters on your navigator. You can likewise prevent Google from collecting any data generated by the cookies regarding your use of the website (including your IP address) and from processing such data by Google by downloading and installing the navigator plug-in, which is available on the following link: <http://tools.google.com/dlpage/gaoptout?hl=fr>

In order to obtain an overview of Google's confidentiality policy, you can click on the following link: <https://support.google.com/analytics/answer/6004245>

#### 6.4 Use of Google Remarketing

We use Google's remarketing technology. This technology allows interested users who have already visited our website and experienced our online services, to be contacted again by way of targeted advertising to the web pages of the network of Google partners. The insertion of advertising is achieved through the use of cookies, which are small text files stored on the user's computer, tablet or mobile phone. The text files may be used to analyse the users' behaviour when they visit the website and then to recommend targeted products and send advertisements based on their interests. In Google Analytics we register the data obtained by advertising linked to Google interests and the visitor data from third party suppliers (e.g. age, sex and areas of interest).

If you do not wish to receive advertising based on your areas of interest and/or you object to the acquisition and use of such data, you can deactivate the use of cookies by Google by carrying out the necessary adjustments to the Google advertising parameters (<https://adssettings.google.fr>). Please note that Google may store new cookies for such purposes. If you delete all the cookies from your computer, you may have to update your deactivation parameters. You can also deactivate the use of third party cookies by visiting the exclusion page of the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1#!/>).



## 6.5 Use of the Facebook Pixel

We use Facebook's technology through its tracking pixel. This pixel is integrated on our website and allows us to carry out advertising campaigns and/ or publications on the social networks Facebook and Instagram to visitors of the website. These advertising campaigns and/ or publications are targeted and based on your interests. More information about the pixel directly on the site <https://www.facebook.com/business/gdpr>.

## 7. Data storage and storage period

We retain your personal data within the European Union.

Unless otherwise indicated in the present data protection statement or in statutory provisions, we keep:

- Personal Data, as indicated in point 2.1 of the present Privacy Policy, for 8 years with effect from the date of their acquisition.
- Personal data relating to your transactions are not kept.

## 8. Our Privacy Policy is subject to change

As we are constantly improving our services, we reserve the right to amend the present Privacy Policy in accordance with current statutory provisions. Any change will be published in this document at the opportune time. We advise you to consult this page regularly so that you are aware of any changes or updates to our Privacy Policy.

## 9. Your rights concerning your personal data

In accordance with statutory provisions you are entitled at any time, to:

- Request information about the data we are processing, as well as a copy of the latter ("right to information"). You can likewise access all the data you voluntarily supplied us with at any time from your personal space on the platform, in a format that is structured, currently used and legible ("right to portability").
- You can likewise request deletion of your personal data or correction where these are incorrect or obsolete ("right to deletion and right of correction"). Please note that we are obliged to retain some information about you where this is demanded by law or if we have a legitimate reason to do so.
- You can request limited processing of your data, provided statutory obligations are complied with ("right to limiting processing").
- You are also entitled, at any time, to object to having your data processed for direct marketing purposes or for processing as described in the present document ("right to objection").
- We will only intervene if you are not the subject of a decision based exclusively on automated processing, in keeping with legal requirements. The Hotel Lepoussin, owned by HCC SAS company, is currently not taking any automated decisions.

In order to exercise any other right indicated in the present section, please contact the Hotel Lepoussin, owned by HCC SAS company, at the address indicated below. Moreover, without prejudice to any other recourse, you are entitled at any time, to send any complaint to the competent supervisory authority.



## 10. Contact

Should you have questions concerning the processing of your data with respect to the use of the platform or when exercising your rights, you may, at any time, contact us or our data protection officer (DPO) at the following address:

Email: [dpo@lepoussinhotel.com](mailto:dpo@lepoussinhotel.com)  
Post: Hotel Lepoussin - HCC SAS

For the attention of the Data Protection Officer

72 descente des Périades

74400 Chamonix Mont-Blanc, France

In order to guarantee complete transparency of our processes, we shall send you, on request, the list certifying your consent to having your data processed. To do this, please send us an e-mail at any time, to the address indicated in section 10 of the present Privacy Policy.