# **Privacy Policy from The French Lodge**

This application collects certain personal data from its Users.

This document can be printed for viewing purposes using the print command in any browser settings.

# **Owner and Processing Manager**

TFL Group Chemin du Quiet, 73210 PEISEY-NANCROIX, FRANCE

Owner's contact email: contact@thefrenchlodge.com

# **Types of Data Collected**

Among the types of Personal Data that this Application collects directly or using third parties: Cookies, Usage Data, email address, first name, surname, phone number, address.

Full details on each type of Personal Data collected are provided in the parts devoted to this privacy policy or by specific explanatory texts published prior to the collection of the Data.

Personal data can be freely provided by the User, or, in the case of Usage Data, collected automatically when you use this Application.

Unless otherwise stated, all Data requested by this Application is mandatory and their absence may make it impossible to provide the Services through this Application.

In the event that this Application specifies that certain Data is not mandatory, Users are free not to share them without affecting the availability or operation of the Service.

Users who have doubts about the mandatory personal data are encouraged to contact the Owner.

Any use of Cookies - or other tracking tools - by this Application or by third-party service owners used by this Application is intended to provide the Service requested by the User, in addition to the other purposes described in this document and in the Cookie Policy, if available.

Users are responsible for any third-party personal data obtained, published or disclosed through this Application and confirm that they obtain the consent of the third party to provide the Data to the Owner.

# How and where data is processed

# **Data processing methods:**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of the Data.

Data processing is done using computers or computer tools, following organizational procedures and modes that are closely related to the stated purposes.

In addition to the Owner, the Data may be accessible, in some cases, to certain categories of people in charge of the operation of this Application (administration, sales, marketing, legal service, system administration) or to external parties (such as third-party technical service providers, courier services, hosting providers, IT companies, communication agencies) designated, if applicable, , as subcontractors by the Owner.

The updated list of these parts can be requested at any time from the Owner.

### **Legal basis for treatment:**

The Owner may process Personal User Data if any of the following conditions apply:

- Users have given their consent for one or more specific purposes; Note: Under certain laws, the Owner may be allowed to process personal data until the User objects ("optout"), without having to depend on consent or any of the following legal bases;
- However, this condition does not apply when the processing of personal data is subject to the European Data Protection Act;
- The provision of Data is necessary for the implementation of an agreement with the User or for any pre-contract obligation of the user;
- Treatment is necessary to comply with a legal obligation to which the Owner is subject;
- The treatment is related to a task carried out in the public interest or in the exercise of the public authority devolved to the Owner;
- Treatment is necessary for the purposes of legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly assist you in clarifying the specific legal basis that applies to the treatment, and in particular if the provision of Personal Data is a legal or contractual requirement, or a requirement necessary to conclude a contract.

#### Place of treatment

Data is processed at the Owner's headquarters and in all other locations where the parts responsible for processing are located.

Depending on the user's location, data transfers may result in the user's data being transferred to a country other than his own.

To learn more about where this transferred data is processed, users can view the section that contains details about the processing of personal data.

Users also have the right to know the legal basis for data transfers to a country outside the European Union or to any international organization governed by public international law or created by two or more countries, such as the UN, as well as the security measures taken by the Owner to safeguard their Data.

If such a transfer takes place, Users can learn more by visiting the corresponding sections of this document or inquiring with the Owner using the information provided in the contact section.

#### **Preservation time**

Personal data is processed and retained for as long as required for the purpose for which it was collected.

#### Therefore:

- Personal data collected for the purposes of the Owner's legitimate interests must be retained for as long as necessary to achieve these objectives.
- Users can find specific information about the owner's legitimate interests in the corresponding sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for longer each time the User has given consent to such processing, as long as that consent is not withdrawn.

In addition, the Owner may be required to keep Personal Data for longer each time it is required to fulfill a legal obligation or on the orders of an authority.

Once the retention period has expired, Personal Data will be deleted. Therefore, the right of access, the right to erase, the right to rectification and the right to portability of the data cannot be applied after the expiration of the retention period.

# **Purposes of the treatment**

User Data is collected to enable the Owner to provide the Service, fulfill its obligations, respond to law enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, and the following: Tag Management, Database Management Users, Analysis, User Contact, Advertising, Remarketing and Behavioral Targeting and Web Hosting and Backend Infrastructure.

To obtain accurate information about the personal data used for each purpose, the User can consult the "More Information on the Processing of Personal Data" section.

# Detailed information on the processing of personal data

Personal data is collected for the following purposes using several services:

#### Analyses

The services in this section allow the Owner to monitor and analyze web traffic and track the user's behavior.

#### **Google Analytics (Google Inc.)**

Google Analytics is a web analytics service provided by Google Inc. (« Google »). Google uses the collected data to track and analyze the use of this Application, prepare reports on its activities and share it with other Google services.

Google can use the collected data to contextualize and customize ads from its own ad network.

Processed personal data: Cookies, Usage data.

Processing Location: United States - Privacy Policy.

#### **Tracking Google Ads conversions (Google Inc.)**

Ads conversion tracking is an analytics service provided by Google LLC or Google Ireland Limited, depending on where this application is accessible, that links Google Ads' at network data to the actions taken on that app.

Processed personal data: Cookies, Usage data.

Processing Location: United States - <u>Privacy Policy</u>. Participating in the data protection shield.

#### **Contact the User**

#### **Contact Form (This Application)**

By filling out the contact form with their Data, the User authorizes the use of this information by this Application to respond to requests for information, citations or any other request as indicated by the head of the form.

Personal data processed: email address, last name, phone number, first name, phone, address.

### • User Database Management

This type of service allows the Owner to create user profiles from an email address, a person's name or other information provided by the User to that Application, and to track the User's activities through analytics. This personal data can also be compared to publicly available user information, such as social media profiles, and used to create private profiles that the Owner can view and use to improve this application. Some of these services can also enable timed messages to be sent to the User, such as emails based on specific actions taken on this application.

#### Tags management

This type of service allows the Owner to manage the necessary tags or scripts on this Application centrally.

As a result, User Data passes through these services, which could result in the retention of this Data.

### Web hosting and backend infrastructure

These types of services are designed to host data and files that allow this Application to work and be distributed, and to provide a ready-to-use infrastructure for specific functions or parts of this application to work. Some of these services work through geographically dispersed servers, making it difficult to determine the actual location where Personal Data is stored.

#### **OVH Cloud**

thefrenchlodge.com is hosted by OVH Cloud of OVH.

OVH Cloud is a hosting service provided by OVH, 2 Kellermann Street BP80157 59053 ROUBAIX CEDEX 1.

Personal data processed: different types of data indicated in the service's privacy policy.

Information available on: https://www.ovh.ie/personal-data-protection/

# Advertising

This type of service allows user data to be used for advertising purposes, displayed in the form of banners and other advertisements on this Application, possibly depending on the user's interests. This does not mean that all personal data is used for this purpose. The information and terms of use are described below. Some of the services listed below may use Cookies to identify the User.

They can also use a behavioral targeting technique, such as displaying ads tailored to the user's needs and behavior, including those detected outside of this App.

Please consult the privacy policies of the relevant services for more information.

In addition to any opt-out option offered by any of the following services, the User may choose to opt out of using cookies from third-party services by visiting the <u>Network Advertising Initiative's withdrawal page.</u>

#### **Google AdSense (Google Inc.)**

Google AdSense is an advertising service provided by Google LLC or Google Ireland Limited, depending on where this application is accessible.

This service uses the "DoubleClick" cookie, which tracks the evolution of the use of this Application and the user's behavior with regard to the advertisements and products and services offered. Users can decide to disable all DoubleClick cookies by visiting: <u>Ad Settings</u>.

Processed personal data: Cookies, Usage data.

Place of treatment: United States - <u>Privacy Policy</u> - <u>Withdrawal Option</u>.

Participating in the data protection shield.

#### Remarketing and behavioural targeting

This type of service allows this Application and its partners to distribute, optimize and present advertisements based on the User's previous use of this Application. This activity is carried out by following the evolution of Usage Data and using Cookies. This information is transferred to partners who manage the remarketing and behavioral targeting activity. In addition to any opt-out option offered by any of the following services, the User may choose to opt out of using cookies from third-party services by visiting the Network Advertising Initiative's withdrawal page.

#### **Facebook Custom Audience (Facebook, Inc.)**

Facebook Custom Audience is a remarketing and behavioral retargeting service provided by Facebook, Inc., which links the application's activity to Facebook's advertising network.

Personal data processed: email address, Cookies.

Place of treatment: United States - Privacy Policy - Rertrait Option.

# Users' rights

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw their consent if they have already given their consent to the processing of their personal data.
- Oppose the processing of their data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Details are added in the corresponding section below.
- Access their data. Users have the right to know if the Data is being processed by the Owner, to obtain information on certain aspects of the processing, and to obtain a copy of the Data being processed.
- Check and get a correction. Users have the right to verify the accuracy of their data and request that it be updated or corrected.
- Limit the processing of their data. Users have the right, under certain conditions, to limit the processing of their data. In this case, the Owner will process their Data only to store it.
- Have their personal data deleted or erased. Users have the right, under certain conditions, to obtain the erasure of their Data from the Owner.
- Collect their data and transfer it to another processing manager. Users have the right to retrieve their Data in a structured, commonly used and machine-readable format and, if technically possible, to pass it on to another person responsible for barrier-free processing of any kind. This provision applies, provided that the Data is processed by automated means and that the processing is based on the user's consent, on a contract to which the User is a party, or on pre-contract obligations.
- **File a complaint.** Users have the right to file a complaint with their data protection authority.

#### Information about the right to object to treatment

Where personal data is treated in the public interest, in the exercise of an official authority devolved to the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to this treatment by providing a reason for their particular situation to justify that objection.

Users should be aware, however, that if their personal data is processed for direct marketing purposes, they may object to this processing at any time without any justification. To find out if the Owner is processing Personal Data for direct marketing purposes, Users can refer to the corresponding sections of this document.

# How to exercise these rights

Any request to exercise the User's rights can be addressed to the Owner through the contact information provided in this document. These requests can be made free of charge and will be reviewed by the Owner as soon as possible and always within one month.

# Cookie Policy`

This app uses Cookies and other IDs. If you wish, you can disable cookies in your browser.

# Additional information on data processing and collection

### Legal action

The User's Personal Data may be used for legal purposes by the Owner in court or in steps that may lead to legal action resulting from inappropriate use of this Application or Related Services. The User is aware that the Owner may be required to reveal personal data at the request of the public authorities.

#### Additional information about the User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information about specific services or the collection and processing of personal data.

# System logs and maintenance

For operational and maintenance purposes, this Application and any third-party service may collect files that record interactions with this Application (system logs) or use other personal data (such as the IP address) for this purpose.

## Information not included in this policy

More information about the collection or processing of personal data may be requested at any time at the contact@thefrenchlodge.com address.

#### How "Don't Track" requests are handled

This application does not support "Don't Track" requests.

### Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time, by informing its Users on this page and possibly in this Application or - as far as technically and legally possible - by sending a notification to Users via the contact information available to the Owner. It is highly recommended to check this page frequently, referring to the date of the last change shown at the bottom. If the changes affect the processing activities carried out on the basis of the User's consent, the Owner must obtain a new consent from the User when necessary.

# Legal definitions and references

#### Personal data (or Data)

Any information that, directly, indirectly or in relation to other information, including a personal identification number, allows the identification or identification of a natural person.

#### Use data

Information collected automatically by this Application (or by third-party services used by this Application), which may include IP addresses or domain names of computers used by Users who use this Application, URI (Uniform Resource Identifier) addresses, time of request, method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server response (favourable result, error, etc.), the country of origin, the characteristics of the browser and operating system used by the User, the different details relating to time per visit (p. e.g. time spent on each page in the Application) and details of the path tracked in the Application with a special reference to the sequence of the pages visited, and other parameters regarding the user's operating system or computer environment.

#### User

The person using this Application who, unless otherwise stated, corresponds to the Person concerned.

#### Person involved

The individual to whom The Personal Data refers.

#### **Subcontractor (or Data Manager)**

The individual or corporation, the public authority, the institution or any other body that processes personal data on behalf of the Processor, as described in this privacy policy.

### **Responsible for treatment (or Owner)**

The individual or corporation, the public authority, the institution or any other body that, alone or in conjunction with others, determines the purposes and means of processing Personal Data, including security measures regarding the operation and use of this App.

Unless otherwise stated, the Processing Manager is the Owner of this Application.lication.

#### This Application

The means by which the User's personal data is collected and processed.

#### Service

The service provided by this Application as described in the related conditions (if any) and on this site/application.

# **European Union (or EU)**

Unless otherwise stated, all references made in this document to the European Union include all the current Member States of the European Union and the European Economic Area.

#### **Cookies**

Small data sets stored in the user's device.

# Legal information

This privacy policy has been prepared in enforcement of the provisions of several legislation, including Article 13/14 of the European Regulation 2016/679 (General Data Protection Regulation)

This privacy policy applies only to this Application, unless otherwise stated in this document.

Last updated: 01/02/2021