

LEGAL NOTICE

This is a legal notice for our websites www.chateaudevarenn.es.net and www.chateaudevarenn.es.fr. This Personal Data Policy binds Astavoz (the managing company managing the Chateau de Varennes) and applies to all personal data processing that we implement on our websites.

In the context of the use of our website, we may collect and process certain personal data. Because respect for our privacy is essential for us and justifies the trust you place in us, we have put in place this personal data policy which aims to inform you about the methods of collecting and processing your personal data.

In compliance with the new General Data Protection Regulations (RGPD) and the French Data Protection Act, we have implemented the necessary measures to protect your personal data. As such, we implement the principles of privacy protection from the design stage and by default, and respect the principles of the RGPD and the Data Protection Act.

1. Identity of the controller

We process your personal data as controller, which means that we control how this personal data is processed and decide on its purposes.

Astavoz are a limited liability company with a capital of € 200 000, RCS n°514 214 519, whose registered office is located at 2 rue Bourgogne 71270 Charette Varennes.

2. Collection of personal data

We mainly collect identification and contact data (name, first name, email address...), which allows us to manage your reservations and the commercial relationship we have with you.

We collect the data that result from your interactions with us, on the website, by phone, via other partners or directly during your stay.

Why do we process your personal data?

- To book a room or create a customer account or track your reservation through our customer service
- As a guarantee, when you book a room online
- For the administration of our website
- When you are looking to contact us via a form or by phone or when you want to leave a notice
- To offer you our commercial offers and those of our partners

What data do we collect?

- Identification data such as: title, surname, first name, email address, postal address, date of birth, postal code, country, language of communication, your mobile and/or fixed telephone number and possibly the recording of your telephone conversations when you make a reservation by telephone
- The data of your stay: dates, number of nights, destination, presence of an adult/child
- Your credit card details
- Data related to your device and connection, including: IP address, Internet connection, browser type, information about the device used

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- Geolocation data, interests and consumption data if you have used a mobile device
In general, the lack of information in the fields identified in the site by an asterisk (*) does not allow us to provide you with all or part of the services we offer and the functionalities of the site and your requests may not be taken into account.
The other fields are optional and are intended to improve the quality of the services offered to you.

When a form (opinions, contacts) offers a free field, we ask you not to indicate any personal information and to limit yourself to the information strictly necessary to process your request. We reserve the right to remove any unnecessary information at your request. We do not collect sensitive data about you.

We automatically collect technical data (IP address, internet connection, browser type, information about the device used) and data collected using cookies when using the services. For more information on cookies, please refer to our cookie management policy.

We may indirectly collect your personal data from some of our partners who record your booking from their own websites and may or may not collect the booking price on our behalf.

These partners are for example agents or Airbnb or Booking.com.

They collect and transmit to us the data necessary for your reservation. These partners may collect other data on their own behalf that we do not have access to.

These companies process the personal data you provide on their own behalf. Therefore, we encourage you to review their privacy policies to understand how and why they treat the data you provide to them.

3. Your rights as a customer

In accordance with the articles 15 to 21 of the RGPD and 38 to 40 of the Data Protection Act, you have a right of access, rectification, deletion, limitation and portability on your personal data. You also have the right to file a complaint with the competent supervisory authority, the Commission Nationale de l'Informatique et des Libertés (CNIL).

If the processing of personal data by us is based on your consent, you may withdraw your consent at any time. You may exercise these rights at any time and free of charge, except in the case of manifestly unfounded or excessive requests (in particular because of their repetitive nature). In this exceptional case, we reserve the right, in accordance with the DGMP, to charge a reasonable fee (based on the administrative costs of your request) or to refuse your request. We inform you that we do not currently have a Personal Data Protection Officer.

- **Right of access**

The right to know if we hold personal data about you and to obtain a copy of it, as well as, in particular, the following information: the purpose of the processing, the categories of personal data processed, the categories of recipients of the data, the period of storage where possible, the rights you enjoy.

- **Right to erase (right to forget)**

Right to obtain the deletion of your personal data in the cases provided for by the DGPS (Article 17), in particular when the data we process are no longer necessary for us, when

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you oppose commercial prospecting and request deletion in addition to stopping the processing, or when the processing is unlawful.

- **Right of opposition**

This right applies when we process your data in order to pursue one of our legitimate interests. In the event of a request for opposition from you, we will analyse the reasons relating to your particular situation and investigate whether we have a legitimate and compelling reason to continue processing your data. Otherwise, we will stop the processing in question.

- **Right to oppose commercial prospecting**

In the event of opposition to commercial prospecting, we will simply stop processing the data concerned.

- **Withdrawal of consent**

Where the processing of your personal data is based on your consent, the withdrawal of your consent prevents us from continuing to process the data in question.

- **Right to limitation**

You may request that the processing be suspended, with the exception of the storage of personal data when you dispute the accuracy of the data (this limitation lasts for the duration of our verification of this possible inaccuracy), when the processing is unlawful and you prefer to obtain the processing limitation rather than the erasure of the data, when we no longer need the data but you consider that they are still necessary for the establishment, exercise or defence of legal rights, when you have made a request for opposition due to your particular situation and this limitation is obtained during the time of verification of the balance of interests between our legitimate interests and your rights and freedoms.

Where processing has been limited, personal data may only be processed with your consent or for the exercise, recording and defence of legal rights.

- **Right to portability**

You have the right to receive the personal data you have provided directly to us, in a structured, commonly used and machine-readable format. You also have the right to transmit this data or to request that we transmit it to another controller. This right applies only to processing operations based on the consent of the person, or on the performance of the contract, which are carried out by an automated process.

4) Contact us

You can apply to exercise one of the rights mentioned below:

- By sending an email explaining the subject of your request to the following address: info@chateaudevarennnes.fr

All requests must be signed and accompanied by a photocopy of an identity document and specify the address to which the reply is expected. A response will then be sent within one month of receipt of the request, which may be extended by two months depending on the complexity or number of requests.

In addition, in accordance with the RGPD, you have the right to file a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL).

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5) How long do we keep your data ?

We keep your personal data collected for the time necessary to achieve the purposes described in Article 2) *Collection of personal data*, increased by the time required by law.

Unless you give us a specific directive (provided that this specific directive is reasonable and feasible for us), we will delete all your personal data in the event of death, at the end of the applicable storage period and applicable requirements, at the request of a rightful claimant and on proof of his status as rightful claimant and of your death.

6/ To whom can we send your data ?

The personal data we collect may be transmitted:

- To the authorized personnel of Astavoz
- To technical service providers providing services that contribute to the achievement of the collection of personal data
- To social networks and in particular, depending on the sites visited, Facebook and Instagram. We therefore invite you to consult the privacy policies of these various social networks to learn about the collections and processing they perform on your data.

If you do not wish your personal data to be transmitted, you may exercise your rights as a customer.

You agree that we may also be required to disclose any information about you in order to comply with Applicable Regulations, or to respond to any judicial or administrative request.

7/ Security measures

We implement appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, accidental loss, alteration, dissemination or unauthorised access to such data.

However, we do not control all the risks associated with the operation of the Internet and draw your attention to the existence of possible risks inherent in its operation.

In the event that you identify a security breach affecting the site, you agree to provide us with relevant information about the breach on a confidential basis.

8) Accuracy of data

As a user of the site or customer, you declare that you are informed of the importance of the accuracy of the personal data concerning you and that you provide information through the site or in the context of your exchanges with us.

You also undertake to provide only accurate personal data during your exchanges, contractualization with us, service requests and throughout the use of the site and to update them immediately if one or more of these personal data should change during the said period of use of the site or the contract binding you with us.

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9) Amendments

This Privacy Policy may be updated and posted online. The previous Personal Data Policy will then be automatically replaced by the new version which will be immediately enforceable against you. Use of the site is subject to the Personal Data Policy in effect at the time of use. In order to keep informed of any such changes and updates, it is recommended that you regularly consult the Personal Data Policy.

10) Responsibilities

You undertake to strictly comply with the terms of this Personal Data Policy and the General Terms and Conditions of Sale of the site when using it.

The company Astavoz may not be held liable in the event of: (i) the use of your data, in particular identification data, by a third party, whether through negligence or your own fault; (ii) the fact that the personal data is incorrect or that it is not updated by you; (iii) failure to comply with your obligations under the applicable regulations, this Personal Data Policy or the GTC and/or other contractual documents that are applicable to you. Any financial penalty that may be imposed on Astavoz will be at your expense, in particular by any decision of a French administrative or judicial court, or by an independent administrative authority such as the Commission nationale de l'informatique et des libertés (CNIL), as a result of your failure to comply with your obligations under this Personal Data Policy.

In the event that one of the clauses of this Personal Data Policy is invalid, in particular due to a change in legislation, applicable regulations or a court decision, this shall in no way affect the validity and compliance with the other clauses of the Personal Data Policy. This Personal Data Policy and the documents to which it refers are governed by French law.

POLICY OF USE OF COOKIES

1) What is a cookie ?

A cookie is a small alphanumeric file that is placed on the user's (hereinafter referred to as "you") device (computer, smartphone, tablet, mobile, etc.) while browsing the site.

2) Is your consent necessary ?

Before depositing or reading a cookie that is not necessary for the provision of a service, website publishers must :

- Inform the user of the purpose of cookies ;
- Obtain the user's consent ;
- Provide a way for the user to refuse them.

The validity period of this consent is thirteen months. Cookies are stored either for the duration of browsing the site or for a period of thirteen months after their first deposit

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on your device. At the end of the storage period, the personal data collected through cookies will be deleted.

However, some cookies are exempt from collecting consent, in particular those strictly necessary for the provision of a service expressly requested by you (for example booking a room).

3) Why do we use cookies?

This site is designed to be attentive to your needs. That is why we use cookies to optimize your visit to the site.

The cookies used fall into the following categories:

- Necessary cookies : they help to make the site usable by activating basic functions such as page navigation and access to secure areas of the site. The site cannot function properly without these cookies.
- Preferences cookies : they allow the site to retain information that changes the way the site behaves or displays as your preferred language or region.
- Statistical cookies : they help the site editor to understand how visitors interact with the site by collecting and communicating information anonymously.
- Marketing cookies : they are used to track visitors through websites in order to offer them relevant advertisements corresponding to their interests.

4) Is it possible to avoid identification through cookies ?

The use of cookies in connection with the use of the site does not allow us to identify you personally, but it does allow us to record information about your device's navigation on the site, which Astavoz will be able to read during your subsequent visits to the site.

The information collected is for our exclusive use (and our partners and agents) and is not shared with third parties.

Cookies issued by third parties, over which we have no control, may be placed on your browser. These cookies allow the user to be personally identified. We invite you to consult the privacy policies specific to each of these third parties.

5) How can I prevent cookies from being stored ?

Apart from the technically necessary cookies, the recording of a cookie on a device depends on your will, which you can express or modify at any time through the different choices available to you.

If you have accepted the registration of cookies on your device, the built-in cookies may be temporarily stored in a dedicated area on your device.

For cookies that do not have the exclusive purpose of allowing or facilitating navigation or that are not strictly necessary for the provision of the services offered via the site, an information banner is displayed when you first connect to the site, in order to inform you before depositing these cookies, of their presence and to allow you, if necessary, to oppose their deposit on your device.

Several possibilities are offered to the user to oppose cookies :

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Setting of cookies by the web browser

The user can configure his Internet browser so that HTTP-type cookies are stored in his device or, on the contrary, they are rejected, either systematically or according to their originator.

The user can also configure his internet browser in such a way that the acceptance or refusal of cookies is offered to him from time to time, before a cookie is likely to be stored in his device.

For the management of cookies and its choices, the configuration of each browser is different. It is described in the help menu of the user's browser, which will allow him/her to know how to modify his/her wishes regarding cookies :

The website of the CNIL (Commission nationale Informatique et Libertés) offers you advice to limit the traceability of your web browsing:

- Block third-party cookies. Third-party cookies are not usually necessary to take advantage of the resources available on the Internet. If you want to limit your traces, it is recommended to refuse them by default.
- Prevent the installation of the most common track markers. Numerous extensions allow the different track markers to be blocked.
- Block social network sharing buttons.

6) What are the consequences of changing cookie settings ?

You are informed that any settings you may make may affect your Internet experience. In particular, access to certain services offered on the site, requiring the use of cookies, and a certain number of functionalities necessary for browsing the site may be degraded (example: registration or display difficulties). In the event of a change in cookie settings, Astavoz cannot in any way be held responsible for any malfunctions that you may notice.