

DATA PROTECTION POLICY

I. GENERAL INFORMATION

The charter below outlines the policy of [Hôtel Whistler](#) (hereinafter referred to as "Hotel") as regards protection of personal data.

This charter applies to all information and personal data provided by yourselves or collected during a stay at the Hotel or during your visit to the website www.whistlerparis.com (hereinafter referred to as "website"). Via the website the Hotel may end up collecting personal data on any person posing a question to the Hotel under "Contact" on the website or making a reservation online.

Any information of a personal nature you might submit to the Hotel is subject to provisions of law n° 78-17 on IT and freedoms dated 6 January 1978 (as amended) and European regulation regarding personal data protection.

II. YOUR RIGHT

You are entitled to a right of access, rectification, deletion, opposition to the processing, limitation of processing, portability of data involved, withdrawal at any time of agreement to the processing of its data based on its agreement, to lodge a complaint with a supervisory authority and to decide on the fate of personal data after death. This right may be exercised at any time by mail to the following address: [Hôtel Whistler, 36 rue de Saint-Quentin, 75010 PARIS, FRANCE](#) or by approaching the following email address bonjour@whistlerparis.com

III. MANAGEMENT OF PERSONAL DATA

3.1 Purpose of data collection

Collection of personal data enables the Hotel:

- To respond to messages you send on the website under "Contact" and provide you information on services and restaurant facilities at the Hotel.
- To enable you to reserve stays at the Hotel online or in person.
- To manage your stay at the Hotel.
- To offer you the best possible experience and guarantee you the same personalised service both today and in the future during their stays at the Hotel.
- To manage newsletter subscription and unsubscription. - With your advance agreement to send you information regarding the Hotel, their services and

advertising messages.

- To manage accounting and financial questions and potential disputes.

The information required to respond to your requests, such as surname, first name, address and email are highlighted on collection forms by a triangle. If fields containing a triangle are not completed, the Hotel cannot address requests.

3.2 Retention of personal data

Data are retained for a period not exceeding that necessary for the following purposes:

Management of client data:

- Active basis (immediately accessible): your data are retained during the relationship and 5 years thereafter. Passport data are retained for the period of stay.

- Archive basis (limited access): data may be retained 5 years after expiry of the retention period for active basis data.

At your request and with your advance agreement passport data are retained until expiry of the passport concerned.

Management of sensitive data:

- Your sensitive data will be retained throughout your stay. With your consent and for your convenience, it may be retained 5 years after your last stay in a hotel of the group.

Management of payments: - Active basis: your payment data are retained throughout processing. - Archive basis: at your request and with your advance agreement payment data (without encryption) are retained until expiry of the card or other means of payment.

Financial and accounting management: - Active basis: data are retained until end of the accounting period and approval of the accounts. - Archive basis: data are retained 10 years after expiry of data retention on active basis.

Management of cookies and other tracers: - Session cookies are retained throughout a session. - Cookies and tracers subject to your agreement are retained 13 months from your agreement. - Cookies facilitate traceability of internet surfers, and IP addresses are retained 13 months from the first visit.

Newsletter:

Your data are retained throughout your active subscription.

Advertising:

Your data are retained 3 years after the last contact, or when there is no response after two successive attempts.

3.3 Recipients of the data

The recipients of your personal data are in particular:

- The Hotel (the current list can be viewed on our website www.whistlerparis.com)
- Medialog, editor of the Property Management System software facilitating management of reservations and client files within the hotel.
- Synxis Sabre Hospitality, editor of the software facilitating online reservations on our website.

And more generally:

- Hosting provider at the online reservation website.
- Providers of e-commerce processing management.
- Financial establishments and online payment providers.

The Hotel do not transfer your data to a third party unless:

- You have given your advance agreement to the Hotel sharing data with this third party
- The Hotel may share the data with this third party to provide the service required or respond to your request
- The Hotel are obliged by any competent authority (particularly legal or administrative) to send them the data in question.

3.4 Transfers of data overseas

Recipients of your data may be located overseas, including places outside the European Economic Area. Any transfer of your data outside the European Economic Area is performed with the appropriate guarantees, particularly contractually, in conformity with the applicable regulations regarding personal data protection.

You can obtain a copy of the appropriate guarantees by writing to the following address: [Hôtel Whistler, 36 rue de Saint-Quentin, 75010 PARIS, FRANCE](mailto:bonjour@whistlerparis.com) or the following email address: bonjour@whistlerparis.com

3.5 Security and confidentiality of personal data

The Hotel have implemented state-of-the-art technical security and organisational measures, particularly regarding the security of the IT system. The Hotel are required to put in place all measures deemed useful in preserving the confidentiality and security of your personal data they process and to prevent them being altered, damaged, destroyed or accessed by unauthorised third parties.

During reservation and in order to participate in the Hotel's security policy, you need to input a password associated with a client account, and this is strictly personal to you.

IV. "COOKIES"

4.1 What is a cookie?

A cookie is a text file that can be inserted in a dedicated space on the hard disk of your device (1) thanks to your navigation software, whenever you consult an online service. A cookie file enables its issuer to identify the device where it is registered throughout validity or registration of the said cookie.

(1) "Device" means the material equipment (computer, tablet, smart phone) you use to consult or display a website, an application or advertising contents.

4.2 The cookies used on our website

When you connect to our website, we may, subject to your selection, install various cookies on your device to enable us to recognise the browser on your device for the period of validity of the cookie concerned.

The cookies we use enable us to:

- compile statistics and visitor and use volumes of the various elements making up our website (headings and contents visited, history), enabling us to upgrade the interest and user-friendliness of our services
- adapt the presentation of our website to the display preferences of your device (language used, display resolution, operating system used etc.) during your visits to our website in line with the materials and display and reading software your device supports
- to the extent you have given us personal data concerning yourself, particularly your contact data, during your registration or your access to one of our services associate these data with navigation information relating to your device, in order to send you, for example, electronic advertising likely to be of interest to you personally
- record information relating to a form you have completed on our website (registration or access to your account) or products, services or information you have selected on our website (service subscribed to, details of a reservation etc.)
- permit you to access reserved and personal spaces on our website such as your account thanks to identifiers or data we may have given you subsequently
- implement security measures, for example when you are required to reconnect to a content or service after a certain lapse of time.

4.3 Your choice concerning cookies

Several possibilities are offered to you for managing cookies. Any setting you might make may influence your internet visit and conditions of access to certain services requiring the use of cookies. You may at any time make the choice of setting and modifying your wishes as regards cookies in the ways described below.

4.3.1 The choice you are offered by your navigation software:

You have free choice whether to configure your navigation software to allow cookies to be installed on your device or to reject them on a systematic basis or by issuer. You may also configure your navigation software, so that you are asked in good time whether to accept or refuse cookies in advance of available registration on your device. For more information consult the section "How to exercise your choice in line with the browser you are using."

a) Agreement to cookies

As a matter of principle registration of a cookie on your device is at your discretion, which can be voiced at any time freely in line with choices offered by its navigation software.

If in your navigation software you have accepted registration of cookies on your device, cookies embedded in the pages and contents you view may be stored temporarily in a dedicated space on your device. There they can be read only by their issuer.

(b) Refusal of cookies

If you refuse registration of cookies on your device, or if you delete those that are registered, you can no longer enjoy a certain number of functionalities that are nevertheless necessary for surfing certain areas of our website. This is the case if you try to access our contents or services requiring you to identify yourself. This is also the case when we or our providers are for technical compatibility purposes unable to recognise the type of browser used by your device, its language and display parameters or the country where your device appears to be connected to the internet.

If applicable, we refuse any responsibility for consequences connected with the degraded functioning of our services resulting from the impossibility for the Hotel of registering or consulting the cookies necessary for their functioning that you have refused or deleted.

(c) How to exercise your choice with the browser you are using

The configuration of each browser is different as regards management of cookies and your choice. This is described in the help menu of your browser, which can guide you as to which method should be used to change your wishes in connection with cookies.

- Internet

Explorer™: <http://windows.microsoft.com/fr-FR/windows-vista/Block-or-allow-cookies>

- Safari™: https://support.apple.com/kb/ph21411?locale=fr_CA

- Chrome™: <http://support.google.com/chrome/bin/answer.py?hl=fr&hlrm=in&answer=95647>

- Firefox™: <https://support.mozilla.org/fr/kb/activer-desactiver-cookies-preferences>

- Opera™: <http://help.opera.com/Windows/10.20/fr/cookies.html>

4.3.2 Your choices expressed on inter-professional platforms online

In the matter of advertising cookies, you can also connect to the website Youronlinechoices prepared by digital publicity professionals grouped within the EDAA (European Digital Advertising Alliance) and managed in France by Interactive Advertising Bureau.

In this way you can learn of the companies registered on this platform offering you the possibility of refusing or accepting cookies used by these companies to adapt to your browser publicity information likely to be sent to your device: <http://www.youronlinechoices.com/fr/controler-its-cookies/>.

This European platform is shared by hundreds of internet publicity professionals and constitutes a centralised interface enabling you to express your refusal or acceptance of cookies likely to be used to adapt the publicity likely to be used to your device's browser. Note this procedure does not prevent display of publicity on websites you visit. It only blocks the technologies enabling adaptation of that publicity to your areas of interest.

4.4 If you share use of your device with others

If your device is used by several persons, and the same device has diverse navigation software, we cannot be totally sure that the services and publicity destined for your device in fact correspond to your own use of this device and not to that of another user.

Actually, sharing use of your device with others and configuration of your browser parameters as regards cookies affects your free choice and responsibility.

For more information on cookies and their use you may consult the file of the Commission Nationale de l'Informatique et des Libertés at the following address: <https://www.cnil.fr/fr/site-web-cookies-et-autres-traceurs>

V. SECURITY

Payments made by card are performed via a secure system using the SSL (Secure Socket Layer) protocol in such a way that information transmitted is software-encrypted, and no third party can access it during transport on the network.

LE WHISTLER CODE OF ETIQUETTE

Hôtel Whistler is conceived as havens for guests to indulge in their beauty and that of their natural surroundings, in a pampering and tailored atmosphere. To ensure every guests' privacy and tranquility is preserved and in compliance with new European data protection laws, we ask guests and visitors to take notice of **Hôtel Whistler's** Etiquette and comply with the following guidelines.

- Respect of local laws, cultural and religious traditions and practices;
- Respect of contractual and payment terms before, during and after a visit for all services ordered and purchased;
- Respect of each individual's privacy, dignity, physical and moral integrity, be it Hotel Ambassadors, or other Hotel Guests under all circumstances;
- Appropriate use of the Hotel's facilities, avoiding voluntary or involuntary damages and disturbance of quiet enjoyment of these facilities;

More generally refrain from having, or inducing someone to have, any unethical, unlawful, improper conduct or behavior inconsistent with public moral and decency, public order and laws, or from adopting conduct or attitudes that offend the standards prevailing among our Hotel, including, without limitation, inopportune or abusive gestures, verbal abuse, physical violence, reprehensible acts, public use of drugs, excessive use of alcohol or any other behavior which may cause nuisance to other guests.

Any violation of **Hôtel Whistler's** Etiquette would compel **Hôtel Whistler** Staff to make a report to **Hôtel Whistler's** local and Central Management and could lead **Hôtel Whistler** to take corrective or preventive measures, including, depending on the nature and the gravity of the offence, restricting access to **Hôtel Whistler** or submitting acceptance of future reservations to specific conditions such as full payment in advance.

For any question regarding the application of **Hôtel Whistler** Etiquette Code, to bring an observation regarding a report or to exercise access, rectif

ication, deletion rights granted under applicable data protection laws, please contact: direction@whistlerparis.com