

# Privacy Policy for websites

*Version 1*

**Les Menuires / St-Martin-de-Belleville  
Reservation**



## Privacy Policy

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## Privacy Policy

### 1. Purpose and scope of the Privacy Policy

Les Menuires / St Martin de Belleville Reservation attaches the greatest importance and pays the greatest attention to protecting private life and Personal Data, and takes great care to comply with current legal provisions.

EU Regulation 2016/679 dated 27 April 2016 relating to the protection of natural persons with regard to the processing and the free movement of personal data (“GDPR” hereinafter) states that Personal Data must be handled in a licit, loyal and transparent manner. Hence, this Privacy Policy (“Policy” hereinafter), aims to provide you with straightforward, clear information on the processing of your Personal Data, in relation to your browsing of our website and any transactions carried out therein.

### 2. Data Controller

For the purposes of your activity on the websites <https://fr.locationlesmenuires.com/> and <https://fr.locationsaintmartin.com/>, we collect and use Personal Data concerning you as a natural person (“Concerned Person” hereinafter).

For all processing, Les Menuires / St Martin de Belleville Reservation, 973 avenue de la Croisette, Immeuble l'Adret 1er étage, 73440 Les Belleville determines the means for and the purposes of that processing. Hence, we act as Data Controller as defined in regulations relating to Personal Data, notably EU Regulation 2016/679 relating to the protection of natural persons with regard to the processing and the free moment of Personal Data.

### 3. What Personal Data do we collect and how?

When using our website and subscribing to our services, you send us a certain amount of information concerning you, some of which relates to your identity. (“Personal Data”). This is the case when you browse our website, when you make a booking, when you complete a form online or offline (e.g., by telephone), or when you respond to our satisfaction surveys.

The nature and quality of the collected Personal Data concerning you depends on your relationship with Les Menuires / St-Martin-de-Belleville Reservation, the main types being:

- **Identification Data:** these include all information that helps us to identify you, such as your surname, first name, telephone number, weight, height and shoe size. We also have to collect your email address, as well as your postal address (in the case of a payment, the postal address is required to produce an invoice). In the case of a subscription, you may be asked to provide proof of identity.
- **Data related to methods of payment:** bank account or postal account details, cheque number, card number, card expiry date;
- **Data related to the transaction:** the transaction number, details of the purchase, subscription, goods or subscribed service;
- **Data related to marital, economic and financial status:** number and age of child(ren) in the household, presence of pets;

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- **Data related to invoice payments:** payment terms, discounts granted, receipts, balances and unpaid amounts;
- **Data related to the selection of people** in order to carry out customer loyalty, canvassing, survey, product testing and promotional campaigns;
- **Data related to the contributions of persons** who submit reviews on the products, services or contents, particularly their pseudonym.
- **Connection Data:** all the information that we need in order to access your online account, including the password, and all information required for authentication and access to an account.  
We also collect your IP address for maintenance and statistical purposes.
- **Documents of various natures** (PDF, Office or Image format) with titles, contents, file names, or information relating to a document, such as comments written within the document, alert and reminder dates.
- **Information related to your navigation:** when browsing our website, you interact with it. Consequently, certain information related to your navigation is collected.
- **Data retrieved from third parties:** the Personal Data that you have agreed to share with us or on social media accessible to the public and/or that we might collect from other databases obtained from our partners, via the aggregated database generated by various entities of the resort.

### 4. Why do we collect Personal Data and how?

We collect your Personal Data for determined purposes and on various legal bases.

For the execution of the contract or of pre-contractual measures, your Data are processed for the following purposes:

- Management of customer relations;
- Management of the commercial relationship;
- Processing of information requests;
- Management of contracts;
- Management of claims and cancellations

On the basis of your consent, your data are processed for the following purposes:

- Execution of commercial canvassing and marketing campaigns (including management of tracking to or via social media);
- Transmission of your Data to our commercial partners;
- Newsletter management;
- Management of cookies requiring your consent;

Within the scope of the legitimate interest of Les Menuires / St-Martin-de-Belleville Reservation, your Data are processed for the following purposes:

- Realisation of satisfaction surveys and polls;
- Reminders of services
- Management of claims and litigation;

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Within the scope of the legal and regulatory obligations to which Les Menuires / St-Martin-de-Belleville Reservation is subjected, your Data are processed for the following purposes:

- Fight against fraud;
- Fight against money laundering and the financing of terrorism;
- General and auxiliary accounting;

### 5. Do we share your Personal Data?

Your Data are intended for authorised employees of Les Menuires / St-Martin-de-Belleville Reservation in charge of managing and executing contracts and legal obligations, depending on the collection purposes and within the limits of their respective duties.

They may be sent for certain tasks pertaining to their purposes, and within the limits of their respective duties and authorisations, to the following recipients:

- Other commercial partners:
  - o Ogone
  - o Ingenico
  - o Worldline
  - o Crédit Agricole
  - o Cybercité
  - o Sam loisirs
- Service providers and subcontractors whom we call upon to execute a set of operations and tasks on our behalf, notably:
  - o L'Office de Tourisme Les Menuires et St-Martin-de-Belleville
  - o Val Tho Parc
  - o Sage (outil de comptabilité)
  - o Ingénie
- Duly authorised public authorities (legal, control, etc.), within the scope of our legal and regulatory obligations;
- Regulated professions (lawyers, bailiffs, etc.) who may intervene for the implementation of guarantees, debt recovery or litigation;

When your Data are sent to our service providers and subcontractors, the recipients are requested not to use the Data for other purposes than those initially intended. We do everything in our power to ensure that such third parties protect the confidentiality and security of your Data.

In any case, only the necessary Data are provided. We do everything in our power to guarantee the safe communication or transmission of your Data.

We do not sell your Data.

### 6. Are your Personal Data transferred to third countries?

Les Menuires / St-Martin-de-Belleville Reservation strives to retain Personal Data within France, or at least within the European Economic Area (EEA).

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However, it is possible that the Data we collect when you use our platform or in the scope of our services are transferred to other countries. For example, this may happen in the case of certain service providers being located outside the European Economic Area.

In this event, we guarantee that the transfer will be made:

- To a country that ensures an adequate level of protection, i.e. a level of protection equivalent to that required by European regulations;
- Within the scope of standard contractual clauses;
- Within the scope of internal company rules.

### 7. For how long do we keep your Personal Data?

We keep your Personal Data only for the time necessary to fulfil the purpose for which we hold such Data, and in order to satisfy your needs or meet our legal obligations.

Retention periods depend on a number of factors, such as:

- Necessity for the activities of Les Menuires / St Martin de Belleville Reservation;
- Contractual requirements;
- Legal obligations;
- Recommendations by the controlling authorities.

Retention periods for your Data are as follows:

Purpose	Retention period
Management of customer relations	5 years from the end of the relationship
Management of the commercial relationship	5 years from the end of the relationship
Processing of information requests	5 years from the end of the relationship
Management of contracts	5 years from the end of the relationship
Management of claims and cancellations	5 years from the end of the relationship
Execution of commercial canvassing and marketing campaigns	3 years from the last contact
Transmission of your Data to our commercial partners	3 years
Newsletter management	3 years from the end of the relationship
Management of cookies requiring your consent	13 months - 25 months for information obtained from cookies
Realisation of satisfaction surveys and polls	3 years from the end of the relationship
Management of claims and litigation	Until settlement of the litigation
Fight against fraud	1 year from the end of the transaction
Fight against money laundering and the financing of terrorism	5 years from the end of the relationship
General and auxiliary accounting	10 years

### 8. How do we guarantee the security of your Personal Data?

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Les Menuires / St-Martin-de-Belleville Reservation undertakes to protect the Personal Data that we collect, or that we process, against loss, destruction, deterioration, access or unauthorised disclosure.

Hence, we implement all appropriate technical and organisational measures, according to the nature of the Data and the risks that their processing entails. Such measures must enable the security and privacy of your Personal Data to be maintained. They may include practices such as limiting access to Personal Data by authorised persons, owing to their functions, or using pseudonymisation or encryption.

In addition, our practices and policies and/or physical and/or logical security measures (secured access, authentication procedure, back-up copy, software, etc.) are regularly checked and updated where necessary.

### 9. What are your rights?

The GDPR makes available to Concerned Persons the rights that they may exercise. These include:

1. **Right to information:** the right to have clear, accurate and complete information on the use of Personal Data by the staff of Les Menuires / St-Martin-de-Belleville Reservation.
2. **Right to access:** the right to obtain a copy of the Personal Data that the Data Controller holds on the claimer.
3. **Right to rectification:** the right to have Personal Data modified if they are inaccurate or obsolete and/or to complete them if they are incomplete.
4. **Right to erasure / right to be forgotten:** the right, under certain conditions, to have Data erased or deleted, unless Les Menuires / St-Martin-de-Belleville Reservation has a legitimate interest in retaining them.
5. **Right to objection:** the right to object to the processing of Personal Data by Les Menuires / St-Martin-de-Belleville Reservation for reasons pertaining to the specific situation of the claimer (under conditions).
6. **Right to withdraw consent:** the right to withdraw consent at any time when the processing is based on consent.
7. **Right to the restriction of processing:** the right, under certain conditions, to request that the processing of Personal Data be momentarily suspended.
8. **Right to Data portability:** the right to request that Personal Data be sent in a reusable format that allows them to be used in another database.
9. **Right to not be the target of an automated decision:** the claimer's right to refuse fully authorised decision-making and/or to apply additional guarantees offered in this matter.
10. **Right to define post-mortem directives:** the claimer's right to define directives related to the fate of Personal Data after death.

Additional rights may be granted by local regulations to the Concerned Parties.

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To this end, Les Menuires / St-Martin-de-Belleville Reservation has implemented a **procedure for the management of the rights** of persons complying with the requirements of applicable legislation. This procedure sets out:

- Norms to be respected in order to ensure the transparency of information for the Concerned Persons;
- Legal requirements that must be respected;
- Authorised means for presenting a request for each right, depending on the category of Concerned Persons;
- The operational processes for handling such requests in compliance with the above-mentioned demands;
- The parties involved in such processes, their roles and responsibilities.

To exercise your rights, you can contact the Data Protection Officer (DPO): [dpo@lesmenuires.com](mailto:dpo@lesmenuires.com)

When you send us a request to exercise a right, you are asked to specify as far as possible the scope of the request, the type of right exercised, the type of Personal Data handling concerned, and any other useful information, in order to facilitate the examination of your request. Furthermore, in case of reasonable doubt, you may be asked to prove your identity.

You also have the right to refer to la Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07, for any claim relating to the manner in which Les Menuires Tourist Office collects and processes your Data.

### 10. Updates to this Policy

This Policy may be regularly updated in order to accommodate evolutions in regulations related to Personal Data.

Last updated on 8 April 2022.