

Data protection policy

TRAVEL PLANET GROUP (hereinafter Travel Planet) hereby states the outline for the processing of your personal data. We process data for the following means: identity data, contact data and travel data.

Personal data collected is not used for commercial purposes. Data is collected for the sole purpose of carrying out contractually stipulated services between Travel Planet and the Customer, regarding travel of its employees.

In the event of a contradiction between the content of this document and the stipulations of the contracts that you have entered into with us, the latter will prevail.

If you have any questions about your data, you can contact Travel Planet or our data protection officer at the following coordinates:

Travel Planet
International House
Trinity Business Park
Wakefield
WF2 8E

Data protection officer
Tristan Dessain-Gelinet
400 promenade des anglais
06200 Nice
France
tristan.dessain-gelinet@my-travelplanet.com

I. The various personal data collected and processed

The data collected and processed by Travel Planet is as follows:

- Identity data: company name, login (if different from employee's email), first name, surname, civility, sex, date of birth information as on the Passport (optional).
- Contact data: address (optional), telephone, emails
- Travel data: preferred language, preferred currency, discount or subscription cards (optional), departure point, destination, departure time, arrival time, company, class and fare.
- Billing data: invoice information (service of the company concerned by invoicing).
- The user profile customization data on the Travel Planet website: preferred language and preferred currency.

II. How we use and share this Policy

A) This personal data is processed for the purposes of:

- Issuing all services chosen by the company for the business travel of its employees and ancillary services,
- transmission, according to the necessary regulatory information, to third parties involved in the delivery of services,

- the contractual relationship including the sending of management mails and emails relating to subscribed services,
- the management of customer satisfaction, for example by conducting satisfaction surveys,
- the establishment of statistics necessary for the customer, for Travel Planet and its components,
- the establishment of invoices relating to the services issued.
- recovery, litigation and evidence management,

B) Communicating your data: Your data may be shared, depending on the treatment, with (i) organisations participating or involved in the implementation of our services (transportation companies, hotels, restaurants, car rental companies etc) and (ii) to legal or State bodies in connection with the fulfilment of our legal and regulatory obligations.

C) Legal basis: The processing of personal data is carried out in accordance with the following legal bases:

- For the execution of contracts relating to services that you have subscribed with us.
- To pursue, in the respect of your rights, our legitimate interests as for example to improve our services and develop our business, **Security:** Travel Planet implements organizational, technical, software and physical measures in the field of digital security to protect your personal data against loss, unauthorized access, disclosure or alteration. In addition, Travel Planet staff are obliged to maintain the confidentiality of your data.

D) Data retention: Travel Planet retains your personal data for the duration necessary for the realization of contractual obligations if necessary augmented by the legal periods of retention and limitation (i.e. in principle five years after the end of the contractual relationship). In order to meet our legal obligations or meet the demands of regulators and administrative authorities, as well as for historical, statistical or scientific research purposes, we may be required to archive your data. Regarding prospects, the data is deleted three years after our last contact.

III. Your rights regarding the processing of personal data

You may, on request, at any time and under the conditions provided in law, (i) access your personal data, (ii) have it corrected, (iii) request deletion, (iv) limit treatment, (v) their location.

You may also oppose, under the conditions prescribed in law, the use of your data.

Please note that the exercise of some of these rights may prevent Travel Planet providing certain services

Appendix 1: Non-exhaustive overview of the information relating to your interactions with us and their consequences on your personal data

Some specific processing operations or those concerning a limited number of customers are not mentioned in this data protection policy. They are then subject



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to a special request for information by the customer via the appropriate communication channels

Purpose 1: Travel Planet Implementation

Reference	Contracts concerned (list non-exhaustive)	Legal basis	Data retention time	Data recipients	Data obtained from third parties
1.1. Service delivery	Service Contract	Execution of a contract to which the customer is part, or the execution of pre-contractual measures taken at the request of the CTO	Five (5) years* from: - the operation for data relating to this operation. - the end of the contract for the data relating to this contract.	- Travel Planet -Third party provider (for example, transport companies, hotels, restaurants, car rental company,)	Some data is transmitted by the company.
1.2. Production of statistics/reporting on behalf of the client	Service Contract	Execution of a contract to which the customer is part, or the execution of pre-contractual measures taken at the request of the CTO	Five (5) years* from: -the operation for data relating to this operation -the end of the contract for the data relating to this contract	- Travel Planet - the Customer	Some data is transmitted by the company.

Purpose 2: Invoices and accounting obligations

Reference	Contracts concerned (list non-exhaustive)	Legal basis	Data retention time	Data recipients	Data obtained from third parties
1.3. Invoices	Contract of services	Applicable legal retention period	Ten (10) years* from the end of the accounting year, or a time period agreed with the client.	- Travel Planet - the Customer	Some data is transmitted by the company.



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Purpose 3: Credit Control, litigation and evidence management

General description: Set of procedures used to recover sums owed by the debtor.

Reference	Contracts concerned (list non-exhaustive)	Legal basis	Data retention time	Data recipients	Data obtained from third parties
1.4. Credit Control	All services implemented by Travel Planet	Execution of a contract to which the customer is part, or the execution of pre-contractual measures taken at the request of the CTO	Five (5) years* from: -the operation for data relating to this operation -the end of the contract for the data relating to this contract	- Travel Planet -Judicial or administrative authority -Departmental officers and judicial assistants (including bailiffs, lawyers) - Collection companies; -Liquidators agents;	Some data is transmitted by the company.

* Subject to the application of longer legal periods of retention or prescription

Appendix 2: Additional Information: Rights

You have the following rights regarding the processing of personal data carried out by Travel Planet.

- **Right of access:** you have the right to obtain confirmation that your personal data is or is not being processed and, where it is, access to the data as well as information on the purposes of the processing (art. 15 of the regulation 2016/679 on the protection of personal data (GDPR). Manifestly unfounded, excessive or repeated requests may not receive a response.
- **Right of rectification:** you have the right to obtain from the processor, as soon as possible, the rectification of your personal data which it deems inaccurate (art. 16 of the GDPR),
- **Right to delete** you have the right to obtain from the processor the deletion of your personal data, under the conditions and under the reservations provided for in article 17 of the GDPR,
- **Right to access** you have the right to receive personal data about you provided to the processor, in a structured format, commonly used and machine readable (art. 20 of the GDPR). This right applies only to the data you have provided, where the treatment is based on your consent or on a contract and is done using automated processes.
- **Right to withdraw consent:** you have the right to withdraw your consent to the processing of your data if this treatment is based on consent. Withdrawal of this consent shall not affect the lawfulness of the consent- based treatment prior to the withdrawal of such data.
- **Right to limitation of treatment:** you have the right to obtain from the processor limitation of the processing of your personal data under the conditions of section 18 of the GDPR,
- **Right of objection:** you have the right to oppose at any time, for reasons relating to your situation, to a processing of personal data where it is based on the legitimate interest (Art. 21 of the GDPR).



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- **Right to organize the fate of your personal data in case of death:** you have the right to define guidelines for the conservation, deletion, and communication of your personal data after your death (Act 78-17 of 6 January 1978 as amended, art. 40, II),
- **Right to lodge a complaint with a supervisory authority:** without prejudice to any other administrative or jurisdictional remedies, you have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data relating to you constitutes a violation of the Regulation applicable to personal data (art. 77 of the GDPR).