

Data Protection, Security and Privacy Policy

Applicable as of 01 August 2020

Acceptance of the General Terms and Conditions of Use (GTC) and this Policy

By using the Platform, the Beneficiary acknowledges and accepts the General Terms and Conditions of Use (GTC) and this Data Protection, Security and Privacy Policy. If the Beneficiary does not approve the General Terms and Conditions of Use or this Data Protection, Security and Privacy Policy, the Beneficiary is requested to cease all use of the Platform and to contact EUROP ASSISTANCE FRANCE at mesdonneespersonnelles@europ-assistance.fr so that it can delete any personal data about them that has been collected.

The terms starting with a capital letter will have the meaning defined in the GTC, indifferently in the singular and in the plural according to the context of their use.

1) Protection of personal data

Data Controller

The Platform is published and operated by EUROP ASSISTANCE FRANCE, Société Anonyme [public limited company] with share capital of €5,316,384, whose head office is located at 11-17. Avenue François Mitterrand - 93210 Saint Denis – France. Registered with the Nanterre Trade and Companies Register under the number 403 147 903.

EUROP ASSISTANCE FRANCE (hereinafter “the Company”) acts as data controller within the meaning of the Act of 6 January 1978 as amended in 2018 entitled the “Data Protection Act” and of the General data protection regulation n°2016/679 of 27 April 2016, hereafter “GDPR”.

The Company has drawn up this Data Protection, Security and Privacy Policy to express its commitment to guarantee the confidentiality and security of information shared by the Beneficiary with it.

This document and its General Terms and Conditions of Use (GTC) define how, and the purposes for which, it collects and uses the personal data of the Beneficiaries within the Platform.

Basis for the processing of data

Collection of personal data of the Beneficiaries by the Company within the Platform is based on the execution of a contract (i.e. the provision of Services on the Platform).

Data Collected

The Company may collect and process personal or sensitive data concerning the Beneficiary when interacting within the Platform and using the Services, which may include the following information provided by the Beneficiary by completing the forms or uploading documents within the Platform:

- ✓ their name, firstname and date of birth;
- ✓ their personal details (e-mail, telephone, address);
- ✓ type of passport;
- ✓ health data (“Contact form”);
- ✓ dates of travel, duration of the mission;
- ✓ number of persons concerned by the travel.

Data collection is intended to enable interested and willing Beneficiaries to benefit from the Services. The Beneficiary's personal data transmitted through the Platform includes its administrative data.

The Company collects data only to the extent necessary and essential to perform the various Services provided in connection with the use of the Platform and for all other purposes set forth in this Privacy Policy.

The Beneficiary is informed that its administrative data collected and transmitted through the Platform are necessary for the use and realisation of the Services. Otherwise, the Beneficiary will not be able to create the Beneficiary Area and benefit from the Services of the Platform. The Beneficiary is informed that the health data collected and transmitted through the Platform are necessary for the use and realisation of the Services, what the Beneficiary expressly consents to.

The Company may share certain information regarding the Beneficiary with other persons as described below:

- ✓ Employees of the Company: are authorised to have access to the Beneficiary's personal data collected within the Platform, the employees of the Company who need it in the context of their function related to the activity of the site, as part of an enabling policy to limit access to data, based on data categories and employee assignments.
- ✓ Third party service providers: The Company employs other companies and others to perform assignments on its behalf. In these cases, the Company only provides them with the information they need to fulfil their mission.

With the exception of these uses, the Company will not transmit the Beneficiary's personal data to a third party without their consent.

However, the Beneficiary is informed that the Company will be able to freely use the data that they have provided in connection with the use of the Services, once they have been anonymised, for the purposes of statistical studies.

Information about the Beneficiaries is an important part of the Company's business and the Company does not sell or rent such information to third parties to enable them to send direct marketing communications to the Beneficiary, except with the express consent of the latter.

Protection of the Company and Third Parties

The Company may disclose the data only if it is legally obligated to do so, or if such disclosure is necessary to carry out and enforce its General Terms and Conditions of Use or any other agreement with the Beneficiary, or to protect the rights of the Company.

How are the Beneficiaries' data used?

The information provided by the Beneficiary in connection with the use of the Services will be used primarily to provide the Platform Services. Thus, the Beneficiary's data can be used to:

- ✓ Provide the Services;
- ✓ customise your visit to the Platform;
- ✓ verify that the content of the Platform is presented in the most efficient way for them and their computer;
- ✓ indicate to them the content likely to interest them according to the Company;
- ✓ contact them and send them information about the Services and changes to the Services;
- ✓ send them e-mails on various issues and interactions related to the use of the Services;
- ✓ contact them if the Company needs to resolve issues relating to the technical assistance of the Platform;
- ✓ provide the Company with information to develop new features and services;
- ✓ manage their Beneficiary Space.

Data Retention Period

In accordance with the amended Data Protection Act of 6 January 1978 and the GDPR, the Data of the Beneficiary are kept by the Company only for the period strictly necessary for the attainment of the purposes set out above.

Data Protection Measures

Enhanced security measures are put in place to allow the collection and processing of personal data under the conditions guaranteeing their confidentiality, integrity and, more generally, their security in compliance with the provisions of the amended Data Protection Act no. 78-17 of 6 January 1978, GDPR as well as applicable legal provisions.

As a reminder, the username and password are strictly personal and must remain confidential, therefore the Beneficiary undertakes not to disclose them. Their use may not be assigned or loaned to any third party for any reason whatsoever.

The Beneficiary is responsible for their retention and must take all necessary measures to ensure that their username and password are not known or used by third parties.

Beneficiary's rights

The Beneficiary profits from a right of access, rectification, deletion and portability of the data which concerns them. The Beneficiary also has the right to restrict processing of their data or to object to the processing. The Beneficiary have the right to give instructions concerning the use and disclosure of their personal data after their death. The Beneficiary can also withdraw their consent at any time. The Beneficiary can exercise their rights (proof of identity attached) by contacting EUROP ASSISTANCE FRANCE at the email address protectiondesdonnees@europ-assistance.fr or at the following postal address:

EUROP ASSISTANCE FRANCE – Data protection officer - 11-17. Avenue François Mitterrand - 93210 Saint Denis – France.

The Beneficiary acknowledges that they may at any time object to the processing of their personal data by requesting the closure of their Beneficiary Space.

2) Cookies

When using the Platform, cookies generated by the Company's or partners' computer servers may be automatically installed on the Beneficiary's terminal, subject to the choices they have made regarding cookies which may be modified at any time.

The sole purpose of these cookies is to enable or facilitate electronic communication and browsing within the Platform and are strictly necessary for the provision of the Services, in particular for:

- ✓ measuring the number of pages viewed, the number of visits and the Beneficiary's activity within the Platform;
- ✓ memorising the information on the forms filled in by the Beneficiary within the Platform (Registration or access to the Beneficiary Area) or Services implemented within the Platform;
- ✓ allowing the Beneficiary to access their Beneficiary Area;
- ✓ implementing security measures, for example when the Beneficiary is asked to login again to Content or a Service after a certain period of time.

Cookies are retained by the Company for a maximum period of 13 months and the data collected through them are not transferred to third parties or used for other purposes.

How to disable cookies?

The Beneficiary may refuse these cookies, modify or delete them at any time and free of charge through the choices described below. The Beneficiary is informed that any setting of their browser that they may undertake may change their navigation within the Platform and the conditions of access to certain Services requiring the use of cookies.

Browser configuration

The Beneficiary may configure their browser software so that cookies are stored in their terminal or, conversely, they are rejected, either systematically or according to their issuer. They can also configure their browser so that the acceptance or the refusal of cookies are proposed to them on a one-time basis, before a cookie is likely to be saved on their terminal.

The Beneficiary is informed that if they refuse the saving of certain cookies on their terminal, or if they delete those that are saved there, they will not be able to benefit from the features necessary to navigate within the Platform and to use the Services. If necessary, the Company declines all responsibility for the consequences related to the degraded operation of its Services resulting from the impossibility for the Company to save or consult the cookies necessary for their operation and that the Beneficiary would have refused or deleted.

For the management of cookies, the configuration of each browser is different. It is described in the help menu of the Beneficiary's browser, which will enable them to know how to modify their wishes regarding cookies.

Internet Explorer

- *In Internet Explorer, click the Tools button, and then click Internet Options.*
- *On the General tab, under Browsing History, click Settings.*
- *Click the Show Files button.*
- *Click on the Name column header to sort all the files in alphabetical order, then browse through the list to files that start with the Cookie prefix (all cookies have this prefix and usually contain the name of the website that created them).*
- *Select and delete them.*
- *Close the window that contains the list of files, then click OK twice to return to Internet Explorer.*

Mozilla Firefox

- *Go to the Tools tab of the browser and select the Options menu.*
- *In the window that appears, choose Privacy and click Show Cookies.*
- *Select and delete them.*

Safari

- *In your browser, choose Edit menu > Preferences.*
- *Click on Security.*
- *Click on Show Cookies.*
- *Select and delete them.*
- *After deleting, click Done.*

Google Chrome

- *Click on the Tools menu icon.*
- *Select Options.*

- *Click the Advanced Options tab and go to the Privacy section.*
- *Click the Show Cookies button.*
- *Select and delete them.*
- *Click Close to return to your browser.*

Other internet browser

Refer to the help topic specific to this browser (usually accessible by clicking on the ? Tab, then Help or by pressing the F1 key on your keyboard).

3) Modifications

This Data Protection, Security and Privacy Policy is subject to change. These changes will come into force upon publication of the new version of the this Data Protection, Security and Privacy Policy on the Platform page.

4) Contact

For any request relating to this this Data Protection, Security and Privacy Policy, the Company invites the Beneficiary to contact the Data Protection Officer at protectiondesdonnees@europ-assistance.fr.