

# PVG CHARTER FOR THE PROTECTION OF CLIENT PERSONAL DATA

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## OUR COMMITMENT TO PROTECTING YOUR PRIVATE LIFE

PVG takes the issue of safeguarding your data privacy seriously. Your complete satisfaction and trust in PVG are of upmost importance to us. In this spirit, we have set up a charter to inform you of the objectives and resources put in place by our group in accordance with the laws and rules in France and current European guidelines.

## TERMS

- **Personal data:** Personal data means any information relating to an identifiable person who can be identified, directly or indirectly, in particular by reference to a surname, first name, identification number, telephone number.
- **A file:** Any structured set of personal data, digital, paper or other medium.
- **Process:** Any operation or group of operations based on data, regardless of the method used, and especially to gather, record, organise, keep, adapt, modify, extract, consult, use communicate by transmission, diffuse or any other form of availability, reconciliation or interconnection as well as blocking, deletion or destruction.

## FIELD OF APPLICATION

The present chapter applies to:

- **All processing of data** by our subsidiaries, managed by the PVG Group (*Hôtel Au Coeur du Village, Hôtel Beauregard, Hôtel Alpen Roc, Hôtel Christiania, Hôtel Le Pélican, Hôtel Impérial Palace, Casino Impérial, Centre de Congrès d'Annecy, Résidence PVG Les Cimes, Résidence PVG Les Grandes Alpes, Chalets PVG, Bowling de La Clusaz, Cristal Spa*).
- **All the websites** of the PVG Group.

## DATA CONTROLLER

- **Data controller:** The data controller is the company in whose name the data is collected. All processing is carried out on behalf of one of the companies or subsidiaries of the PVG Group. The PVG Group holding is SARL PVG, SARL, with a capital of 359 283 € RCS Annecy 343 377 990 00027 the headquarters are 27 place Jean Prémat, CS20050, 74220 La Clusaz Cedex, France.

SARL PVG determines:

- ☐ The purpose of the data processing,
- ☐ The methods of each procedure (*collection, recording, modification, etc*) performed upon personal data.

SARL PVG is committed to:

- ☐ Respecting the principles of data protection,
- ☐ Informing of the existence of rights of access, correction and opposition,
- ☐ Complying with all legal and regulatory formalities.

- **Data-processor:** The data-processor is any natural or legal person, public authority, service or organism that processes personal data on behalf of a subsidiary of SARL PVG and only on their instruction. The data-processor must be a legal entity separate from SARL PVG or one of their subsidiaries and is obliged to protect your data in the upmost security and confidentiality. At any moment and at the request of SARL PVG, the data-processor must be able to provide sufficient guarantees regarding the setup of technical and organisational measures to ensure the protection of your personal data.

## CONSENT

Customer consent is obtained through various forms:

- The information sheet or guest register during hotel check-in,
- The membership form for the loyalty programme at the Imperial Palace Casino,
- The transaction report form on sums equal to, or over € 2 000 at the Casino,
- The CSG deduction sheet (General social security) for a win over, or equal to € 1 500 at the Casino, apart from gaming tables,
- The wellness questionnaire to be completed before a treatment at the spa,
- The satisfaction questionnaires in our different establishments,
- Entry to competitions,,
- Subscription to newsletters of the different establishments.



## COLLECTED PERSONAL DATA

The information we collect is:

- ☐ Contact information *(for example, surname, first name, telephone number, email...)*,
- ☐ Personal information *(for example, date of birth, nationality...)*,
- ☐ Information about your children *(for example, first name, date of birth, age...)*,
- ☐ Your credit card *(for transactions and reservations)*,
- ☐ The date of your intended arrival and departure and the dates reserves,
- ☐ Information about your vehicle *(registration number, make, model, colour...)*,
- ☐ Your preferences and interest *(for example which floor you prefer, type of bedding, type of media you read, sports, cultural interests...)*,
- ☐ Your questions and comments during or after a stay in one of our establishments.

- **Collection of information about children under 18:** Limited to name, nationality and date of birth that can only be supplied by an adult. Please ensure that your children do not give us any other information without your express permission, in particular by internet. In the possibility that such a thing should happen, you may contact us *(section on "Access and modification")* so that this information may be removed.

- **Sensitive information:** We will not wilfully collect sensitive information such as racial or ethnic origin, political opinion, philosophical or religious beliefs, union membership, health details or sexual orientation.

- **Other sensitive information:** We may need to collect the following information to satisfy your request or to provide the appropriate service: your credit card number, your leisure pursuits, personal activities and hobbies, your treatment, the state of your health to adapt a treatment accordingly, your size/weight/shoe size for sports equipment hire etc.

- **Collection of relevant information:** We endeavour to collect only the most strictly necessary information for the purpose required and to provide the best quality service in our establishments.

## WHEN IS YOUR PERSONAL DATA COLLECTED?

Personal data can be collected at different instances, notably:

- **Internet activity:**
  - ☐ Connexion to websites if the PVG Group or one of its subsidiaries *(address IP, cookies)*,
  - ☐ Standard data collection forms online *(online booking, quotation forms, questionnaires, Group PVG and subsidiaries social network pages, connexion devices such as Facebook Login...)*.
- **Hotel operations:**
  - ☐ Quotation request,
  - ☐ Guest room reservation,
  - ☐ Foreign guest check-in *(information and registration)*,
  - ☐ Bar and restaurant orders or at the hotel spa during your stay,
  - ☐ Check-in and payment,
  - ☐ Requests, complaints and disputes,
  - ☐ Participation in our customer satisfaction survey.
- **Spa activities:**
  - ☐ Before a treatment *(wellness questionnaire, information on contraindications)*,
  - ☐ After a treatment *(participation in our customer satisfaction survey)*.
- **Casino activities:**
  - ☐ Membership to our loyalty programme,
  - ☐ In the case of a win over € 1 500 and payment of the CSG *(General Social Security)*,
  - ☐ In the case of a transaction over € 2 000.
- **Leisure activities:**
  - ☐ Request for a quotation,
  - ☐ Subscription to a newsletter.
- **Events:** concerts, theatre, festivals
  - ☐ Box office,
  - ☐ Subscription to a newsletter.
- **Meeting activities:** Team Building, Congress, Events
- **Participation in marketing programmes**
  - ☐ Trade Fair encounters,
  - ☐ Membership to loyalty programmes,
  - ☐ Subscription to newsletter in order to receive special offers by email,
  - ☐ Competition or games online.
- **Transmission of information by a third party**
  - ☐ Tours operators, Travel agencies, booking procedures, etc...

## PURPOSE OF COLLECTED PERSONAL DATA

We collect your personal data for the following objectives detailed below:

- **Internet activities:**
  - ☐ To improve your experience on the website of PVG Group and its establishments'.
- **Hotel operations:**
  - ☐ To manage guest room reservations and accommodation requests,
  - ☐ To conform to legal requirements for foreign guests (*passport number and registration*),
  - ☐ To manage our client relations before, during and after your stay,
  - ☐ To manage access to guest rooms,
  - ☐ To better understand your needs, wishes and preferences to improve our hotel service,
  - ☐ To monitor under consumption (*restaurant, spa, telephone, bar, payTV...*) to establish correct invoices at the end of your stay,
  - ☐ To establish and file legal documents in compliance with accounting rules and regulations,
  - ☐ To manage an internal list of clients who have behaved in an inappropriate manner behaviour during a hotel stay (*aggression, rudeness, non-respect of the hotel contract, non-respect of security rules, theft, damage and vandalism or payment issues*),
  - ☐ Security maintenance and fraud prevention,
  - ☐ To use a telephone service dedicated to those present in the hotels of the PVG Group in case of serious incidents affecting the concerned establishment (*natural disasters or terrorist attacks*),
  - ☐ To improve our customer service through surveys and analysis of questionnaires and customer suggestions,
  - ☐ To manage complaints.
- **Spa activities:**
  - ☐ To adapt the treatment to customer preference and health,
  - ☐ To be prepared for all the contraindications for each specific treatment,
  - ☐ To improve our customer service through surveys and analysis of questionnaires and customer suggestions.
- **Casino activities:**
  - ☐ To comply with current gaming legislation,
  - ☐ To manage the Casino loyalty programme,
  - ☐ To manage our slot machines (*location, replacement, offers...*),
  - ☐ To set up special offers and promotions,
  - ☐ To improve the client experience.
- **Leisure activities, Events and Corporate activities:**
  - ☐ To inform about services on offer, events programmes and marketing offers.
- **Sales and Marketing department:**
  - ☐ The department will modify and improve the information collected: update the client database, crosscheck, analyse and combine the collected data, segment the client database, identify your interests, your client profile, process the right of opposition, access and modification,
  - ☐ To conduct marketing operations and brand promotions (*by email by sending newsletters, by contacting you by phone*),
  - ☐ To produce direct mail (*addressed direct to you, with personalised special offers, with targeted communication*),
  - ☐ To prepare for and anticipate future consumer behaviour,
  - ☐ To adapt our products and services to better accommodate your requests,
  - ☐ To manage loyalty programmes,
  - ☐ Establish statistics and sales figures to report back,
  - ☐ To provide contextualised data to the Push offers tool when a client visits PVG Group website or when they make a reservation,
  - ☐ To manage unsubscribe requests from a newsletter, special offers, tourist offers and satisfaction surveys.

## PERSONS WITH ACCESS TO YOUR PERSONAL DATA

In order to do our job, we have to share your personal data with internal and external data recipients:

- **Internal:**
  - ☐ Our hotel staff (*reservation, sales and reception*),
  - ☐ Our casino staff (*cash desk, iD check staff, members of the management committee*),
  - ☐ Our sales and marketing department.

We can only share your personal data internally by giving access to authorised staff members.

- **Our service providers** (*unauthorised to transfer your personal data to a third party*):
  - ☐ IT services,
  - ☐ Reservation management software (hotel, restaurant, bowling...),
  - ☐ Availability management software (channel manager),
  - ☐ Casino management software,
  - ☐ Loyalty management software,
  - ☐ Customer relation management software,
  - ☐ Newsletter management software,

- ❑ Spa management software,
  - ❑ Accountancy software,
  - ❑ Banking software,
  - ❑ Postal and delivery software,
  - ❑ Google suite with Google Analytics
- **With possible partners:**
  - ❑ Medical services,
  - ❑ Legal services.
- **With our trading partners:**
  - ❑ Tours operators, Online Travel Agencies...
  - ❑ Sport equipment hire,
  - ❑ Box-office service.
- **With local authority** when required by the law or in the course of an inquiry and according the local rules and regulations.

## CONSERVATION OF YOUR DATA

Your data is kept in our systems for the required duration and for a maximum of **3 years for clients**, from the end of commercial relations and for prospective customers, **3 years from the collection**, of their data and from the last date of contact on behalf of the prospective client and only for sales and marketing prospection.

Nevertheless, the PVG Group preserves written confirmation of the conclusion of a contract for amounts over € 120 from the end of the contract and until the execution of the service during a period of 10 years with a guarantee of access for the same period. Out with this maximum period without contact, your data will be archived.

## SECURITY MEASURES TO PROTECT YOUR IDENTITY

Security and confidentiality of your personal data are our top priorities. The PVG Group take all technical and organisational measures necessary to protect your personal data against abuse, unlawful or accidental destruction (*server backup*), loss or accidental alteration or unauthorized access or disclosure in accordance with all applicable legal requirements.

In view of this, we have put technical measures in place such as firewalls, and organisational measures such as identity codes, passwords as well as physical protection means etc.

Computer stations are systematically locked down and accessible only using an id code and a password. Reservation management software also require id and a password. Excel files that include personal data are stored in a register accessible only to authorized members of staff. When you communicate information regarding your credit card for a booking, your transactions are processed and secured through an SSL (*Secure Socket Layer*).

## COOKIES AND TRACERS

The PVG Group uses cookies and others tracers on its websites.

## ACCESS AND MODIFICATIONS

You have the right to access your personal data collected by PVG Group to modify them and the right of opposition, subject to applicable legal requirements.

To ensure confidentiality and protection of your personal data, you must send a written request including a copy of an official form of identity, such as a driving license or passport so that we can formally identify you and fulfil your request. **Your request must be addressed to the establishment concerned.**

All requests will be processed as soon as possible, in accordance with the applicable law.

In case of difficulty or for any other question regarding this subject, please contact the department in charge of personal data for the PVG Group by email at: [donneespersonnelles@groupe-pvg.fr](mailto:donneespersonnelles@groupe-pvg.fr), or in writing at the following address:

### Groupe PVG

Service de la Protection des Données Personnelles  
23 place Jean Prémat, CS 20050  
74220, La Clusaz Cedex, France

## LIST OF OBJECTION TO COLD CALLING

In accordance with Article L.223-2 of the Consumer Code, you are informed of your right to register on a list of OBJECTION TO COLD CALLING opposition to canvassing via the BLOCTEL site ([bloctel.gouv.fr/](http://bloctel.gouv.fr/)).

## UPDATES

The present Charter is susceptible to change. We suggest you consult this Charter when making a reservation in one of our establishments.

