

PERSONAL DATA PROTECTION CHARTER

In the context of their activities, the entities of the Gekko Group (which includes Gekko Sas and its affiliates Gordon BedBank, Air Corporate System, Teldar Travel Sas, and Hotel Corporate System, all located at 82 rue Henri Farman, TOUR SEQUANA - 92130 ISSY-LES-MOULINEAUX, FRANCE, as well as Teldar Travel Ltd and Teldar Travel Espana hereinafter together the "Gekko Group") are led to process personal data relating to representatives and staff members of its clients and prospects travel agencies, wholesalers or corporate (hereinafter the « Clients »), to contacts working with their suppliers or service providers (hereinafter the « Suppliers or Service Providers »), to the final customers of Gekko Group's Clients (hereinafter the « Travelers »), as well as to the applicants for a job in one of the entities (hereinafter the « Applicants »), (together hereinafter « You »). To this end :

- Teldar Travel acts as a data controller for the data processing related to the contacts of its Clients, Suppliers or Service Providers, but also related to Travelers when these latter or our Clients book their reservation from the Teldar Travel website or call center, and to Applicants ;
- Hotel Corporate System acts as a data controller for the data processing related to the contacts of its Clients, Suppliers or Service Providers, but also related to Travelers when these latter or our Clients book their reservation from the Hotel Corporate System website or call center, and to Applicants ;
- Gordon Bedbank acts as a data controller for the data processing related to the contacts of its Clients, Suppliers or Service Providers, but also related to Travelers when these latter or our Clients book their reservation from the Gordon Bedbank website or call center, and to Applicants.

We know that privacy and data protection are part of your legitimate concerns.

This is the reason why we have established and implement the present data protection Charter (hereinafter the « Charter ») which describes the way your data may be used.

In order to give you the clearest and most transparent information possible, the Charter has been drafted to inform you about the Gekko Group practices but also to provide you with a specific and tailored information, depending on whether you are:

- Client of the Gekko Group ;
- Supplier or Service Providers of the Gekko Group ;
- Travelers ;
- Applicant for a job at the Gekko Group.

You should read the Charter carefully in order to be informed about the nature of the data the Gekko Group holds on you and on how it uses them.

In order to help you understand the present Charter, all the terms beginning with a capital letter are defined in a Glossary we have drafted for you, at the end of this document.

For more clarity, you will find below the summary of the Charter.

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Last Update

23/11/2023

I. GENERAL PRINCIPLES APPLICABLE TO ALL OUR DATA PROCESSING

1) WHEN DOES THE CHARTER APPLY ?

The Charter applies to Clients, to Suppliers and Service Providers, to Travelers and to Applicants.

The Charter is subject to change or modification.

As a consequence we invite you to regularly consult it on our website www.gekko-group.com.

2) WHAT ARE OUR COMMITMENTS ?

Each one of the Gekko Group entities processes all of your data according to the terms of this Charter and in accordance with the applicable law.

In particular, the Gekko Group is fully committed to ensure that the data are :

- Processed in a **fair, lawful and transparent** way,
- Used **in accordance with the purposes** for which they were collected,
- Kept in a way that ensures there **security and confidentiality**,
- **Updated as regularly as possible**.

The Gekko Group retains your data for no longer than necessary for the purposes for which it is processed. To this end, we have also drafted a data retention policy, that you can request by sending an email to the address indicated under article 6 below.

We may also need to archive your data for a longer period of time in order to allow us to establish the proof of a right or contract, or to ensure our compliance with an obligation (legal, accounting, etc.). Archiving is conducted safely and with restricted access, in accordance with the applicable rules for a period of time that complies with legal requirements.

The Gekko Group will ensure that your rights are respected, in accordance with article 6 below.

3) WHAT ARE THE SPECIFIC CATEGORIES OF PERSONAL DATA COLLECTED ?

The Gekko Group collects and processes data that are related to the health of the Travelers when the booking indicates that reduced mobility access is required.

Besides these data related to health, the Gekko Group does not collect, use, store or process « sensitive » personal data, such as the ones revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data used for the purpose of uniquely identifying a natural person or data concerning a natural person's sex life or sexual orientation about you.

4) WHAT IS BEING DONE TO ENSURE DATA SECURITY ?

The Gekko Group takes suitable technical and organizational measures in accordance with applicable legal provisions to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, or unauthorized disclosure or access. To this end, technical measures (e.g. antivirus, daily backups, VPN, IPsec protection), organizational measures (including a login/password system, authorization, IT charter) and physical protection measures (alert system, badges and video monitoring) are implemented.

5) ARE YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION ?

Our data processing are mainly conducted in Europe.

However, it may happen that the Gekko Group transfers personal data to a third country outside the European Union. In the event that such a transfer is made to a country whose level of protection would not be considered as adequate by the European authorities, we undertake to ensure that the transfer in question is subject to appropriate guarantees in accordance with the applicable legislation.

For example, we will ensure that companies importing your data sign data processing contracts based on the standard contractual clauses validated by the European Commission to which additional measures may be added, or that they have adhered to a code of conduct or a certification scheme.

You can ask for more information about the safeguards implemented by sending an email at the address indicated under article 6 below.

6) HOW TO EXERCISE YOUR RIGHTS ON THE DATA?

You have the rights to obtain information and to have access to your personal data that are collected by the Gekko Group, unless otherwise provided by applicable law.

You have also the right to request the rectification of your data, their erasure or to limit their processing. Also, you have the right to your data portability and the right to define instructions for data processing after your death (« post-mortem » instructions). You may also object to the processing of your data. These rights can only be exercised insofar as they do not prevent the proper execution of the contract between you and the Gekko Group. You can exercise your rights by contacting the data protection referent of the Gekko Group at the following address: rgpd@gekko-holding.com

In order to ensure the confidentiality and the protection of your personal data, we will need to identify you in order to answer to your request. To that extent, in case of reasonable doubts about your identity, you may be asked to attach a copy of an official identify document such as an identity card or passport, in support of your request. In this case, a black and white front copy of one of these documents is sufficient. All requests will be processed as soon as possible and in accordance with the applicable law.

You can also lodge a complaint with a supervisory authority (list of supervisory authorities in the European Union:

http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

II. SPECIFIC RULES APPLICABLE TO YOU

7) IF YOU ARE A CLIENT OF THE GEKKO GROUP

The Clients of the Gekko Group are travel agencies, corporate customers or hotel wholesalers. When a Client contacts the Gekko Group, we collect the personal data of the representatives and staff members of the travel agency through order forms, contact forms, our online platforms or our call centers. We process your personal data according to the following characteristics :

Collected data	The purposes of the processing of your data	The legal grounds of the processing of your data	The data recipients	The data retention period in the active base	The data retention period in the archive base
<ul style="list-style-type: none"> Your name and surname ; Civil status ; Birth date ; Professional email ; Professional phone number. 	<ul style="list-style-type: none"> Registration to the service proposed by the Gekko Group ; Creation of an user account ; Creation and registration of a reservation ; Gift voucher operation (Teldar) ; Sending an activity report (HCorpo) ; Synchronization of user profiles (HCorpo) ; Realization of statistical reports ; 	<ul style="list-style-type: none"> Processing necessary for the performance of a contract to which the Client is party 	<p>Internal recipients :</p> <ul style="list-style-type: none"> Gekko Group internal services : implementation, tools, call center, technique, marketing, sales, accounting. <p>External recipients :</p> <ul style="list-style-type: none"> Server hosting; Customer Relationship Management software 	<ul style="list-style-type: none"> Your data is kept for the duration of the contract that binds us. Your data is retained for 3 years after your last contact with us 	<ul style="list-style-type: none"> No archiving

	<ul style="list-style-type: none"> • Litigation management ; • Management of a customer file (relative to the old NS48 standard) ; • Punctual communication to the Customer (satisfaction surveys, marketing operations). 	<ul style="list-style-type: none"> • Processing is necessary for the purposes of the legitimate interests pursued by the Gekko Group. 	<ul style="list-style-type: none"> • Marketing campaign software ; • Provider of gift vouchers/methods of payment • Technical service provider; • 24-hour call center service provider and quality; 	<ul style="list-style-type: none"> • Your data is retained for 3 years after your last contact with us ; • If necessary, your data will be kept for the duration of the litigation. 	<ul style="list-style-type: none"> • No archiving.
	<ul style="list-style-type: none"> • Accounting management ; • Management of user requests. 	<ul style="list-style-type: none"> • Processing is necessary for compliance with a legal obligation. 		<ul style="list-style-type: none"> • Your data is kept for the duration of the processing request. 	<ul style="list-style-type: none"> • Statutory limitation period.

8) IF YOU ARE A SUPPLIER OR A SERVICE PROVIDERS OF THE GEKKO GROUP

When the Gekko Group contracts with a Service Provider or a Supplier, we collect Personal Data from their representatives and staff members. These personal data are of a professional nature.

We process your personal data according to the following characteristics :

Data collected	The purposes of the processing of your data	The legal grounds of the processing of your data	Data recipients	The data retention period in the active base	The data retention period in the archive base
<ul style="list-style-type: none"> Your name and surname ; Professional E-mail ; Gender. 	<ul style="list-style-type: none"> Management of Suppliers and Service Providers. 	<ul style="list-style-type: none"> Processing necessary for the performance of a contract to which the Supplier or Service Provider is party. 	<p>Internal recipients :</p> <ul style="list-style-type: none"> Gekko Group internal services : tools, call center, technique, accounting. 	<ul style="list-style-type: none"> Your data is kept for the duration of the contract that binds us ; Your data is retained for 3 years after your last contact with us. 	<ul style="list-style-type: none"> No archiving.
	<ul style="list-style-type: none"> Litigation management ; Management of Customer or Traveller requests. 	<ul style="list-style-type: none"> Processing is necessary for the purposes of the legitimate interests pursued by the Gekko Group. 	<p>External recipients :</p> <ul style="list-style-type: none"> Server hosting; Customer Relationship Management software ; Technical service provider ; 24-hour call center service provider and quality. 		<ul style="list-style-type: none"> Statutory limitation period.

9) IF YOU ARE A TRAVELER

If you are the client of one of our Clients and you make a reservation through it or directly with the Gekko Group on our online platforms or our call centers, we collect your personal data.

We process your personal data according to the following characteristics :

Data collected	The purposes of the processing of your data	The legal grounds of the processing of your data	Data recipients	The data retention period in the active base	The data retention period in the archive base
<ul style="list-style-type: none"> Name, surname ; Booking dates and location ; Nationality (as part of a car reservation) ; Phone number ; Email ; Necessity of reduced mobility access ; Children's age. 	<ul style="list-style-type: none"> Creation and registration of a reservation. 	<ul style="list-style-type: none"> Processing necessary for the performance of the contract that binds us. 	<p>Internal recipients</p> <ul style="list-style-type: none"> Gekko Group internal services : implementation, tools, call center, technique, marketing, sales, accounting. <p>External recipients :</p> <ul style="list-style-type: none"> Servers hosting ; Hotels or hotel chains ; Hotel wholesalers ; Customer Relationship Management software ; Marketing campaign software ; Provider of gift vouchers/methods of payment ; Technical service provider ; 24-hour call center service provider and quality. 	<ul style="list-style-type: none"> Your data is kept for a maximum of two years after the end date of your last trip when it is processed. 	<ul style="list-style-type: none"> Statutory limitation period, e.g. 5 years for commercial matters or 10 years for accounting documents.
	<ul style="list-style-type: none"> Litigation management ; Satisfaction surveys ; After-sales management. 	<ul style="list-style-type: none"> Processing is necessary for the purposes of the legitimate interests pursued by the Gekko Group. 			
	<ul style="list-style-type: none"> Accounting management. 	<ul style="list-style-type: none"> Processing is necessary for compliance with a legal obligation. 			

10) IF YOU ARE AN FOR A JOB IN THE GEKKO GROUP

When you apply for one of our job offer or when you submit a spontaneous application by sending us your CV, we examine it to determine whether your profil corresponds to our needs. We may also collect your personal data from your former employers.

We process your personal data according to the following characteristics :

Data collected	The purposes of the processing of your data	The legal grounds of the processing of your data	Data recipients	The data retention period in the active base	The data retention period in the archive base
<ul style="list-style-type: none"> The information on your CV. 	<ul style="list-style-type: none"> Analysis of your application to determine if it corresponds to the position to be filled ; Contact to arrange a meeting ; Litigation management. 	<ul style="list-style-type: none"> Processing is necessary for the purposes of the Gekko Group legitimate interests. 	<p><u>Internal recipients :</u></p> <ul style="list-style-type: none"> Human Resources department ; The person in charge of the services concerned by the recruitment. <p><u>External recipients :</u></p> <ul style="list-style-type: none"> LUCCA (HR software tool). 	<ul style="list-style-type: none"> Your data is kept for the duration of the recruitment process ; Your CV is kept for 2 years from your last contact with us ; If we wish to keep your CV more than 2 years, we will ask for your prior consent. 	<ul style="list-style-type: none"> No archiving.



GLOSSARY

- « **Personal data** » means any information that identify you directly or indirectly. This may include your name, first name, image or voice, or your social security number.
- « **Purpose** » means the main purpose of the use of your personal data. In other words, this is the reason why we process your data.
- « **Processing** » means any operation or set of operations which is performed on personal data, whatever the process used (collection, recording, organization, conservation, adaptation, modification, extraction, consultation, use, communication by transmission or diffusion or any other form of disclosure, combination). For example, the management of the staff or the recording of calls in the call center, are treatments.
- « **Controller** » means the natural or legal person which determines the purposes and means of the processing of personal data, i.e. all operations carried out on them (such as collection, consultation, storage, etc.). In other words, it is the person who decides why and how to process your personal data.
- « **Processor** » means the natural or legal person (company or a public authority) which processes personal data on behalf of the controller, in the context of a service or provision of a service. The relations with our processors are governed by subcontracting agreements, in accordance with the applicable legal requirements.

At the date of release of this charter, you will find below the list of Processors necessary in the execution of our services:

Salesforce
Viaxoft
OVH
Gmail
Datadog
Califun
Comdata
PCI Booking
Ingenico Payment Services
Mandrill (Mailchimp)
Sixoft
Amazon (AWS)