

PayTravel

Paytravel Privacy Policy

This privacy policy (the "**Privacy Policy**") applies to the Processing of Personal Data implemented by Evaneos as part of the provision of the Paytravel Service, a payment service enabling Users to pay **Local Agencies** securely.

This policy is subject to the amended French Data Protection Act no. 78-17 of 6 January 1978 (hereinafter referred to as the "**Data Protection Act**") and the European Data Protection Regulation of 27 April 2016 (hereinafter referred to as the "**GDPR**").

It may change depending on the legal and regulatory context and the policy of the CNIL (French data protection authority). Please read it carefully and refer to it regularly.

All capitalised terms shall have the same definition as that given in the **General Terms and Conditions of Use** of the Paytravel Service or in the GDPR.

1. DATA CONTROLLER

The Data Controller of the Personal Data processing associated with the Paytravel Service is Evaneos, a public limited company registered in the Paris Trade and Companies Register under number RCS 513 191 122 and whose registered office is at 27 Rue de Mogador in Paris (75009).

2. WHAT DATA DO WE COLLECT, FOR WHAT PURPOSE DO WE COLLECT IT AND FOR HOW LONG DO WE KEEP IT?

We collect your Personal Data indirectly, when the Local Agency with which you subscribe to a travel service sends us the information relating to your quote, and then directly, when you fill in the forms enabling you to pay an instalment to this Agency.

All the data requested on the collection forms is necessary for the services requested and is therefore compulsory in order to benefit from the Paytravel Service.

We use your Personal Data to implement the Paytravel Service for the following purposes:

- **Registering and executing your payments.** When you make a payment using a credit or debit card or another payment method, you are required to provide certain Personal Data, such as your first and last name, your bank card number, the Card Verification Value ("CVV/CVC") and the expiry date. The categories of Personal Data requested may vary depending on the payment method available on the Platform. In addition, we collect transactional data (such as date and amount of payment, payment schedule, recipient Local Agency) as part of the execution of the payment order.

It is important to note that when you pay with the Paytravel Service, your payments are secure. Bank details are transferred to our service providers, who act on our behalf as data processors, and who use PCI-DSS (banking security standard) certified payment solutions to guarantee the security of your online payments.

- Data category: your identification data, postal address and e-mail address, data relating to the travel service paid for (and in particular the start date of the trip), your payment amounts and payment schedules, your bank details and bank card data.
- Reasons for using this data (or legal basis): Performance of the Contract.
- Retention period:

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- Your bank card details are sent directly to our financial partner and kept for 2 years from the date of the payment. They are not stored by Evaneos.
 - The data relating to your transactions is kept for a period of six (6) years from the date of commencement of the trip paid for using the Paytravel Service.
- **Detecting bank card fraudsters.** To ensure the security of your electronic payments, we implement, with the help of our financial partner, a system designed to prevent any misuse or fraudulent use of a bank card. This system is based on automated processing of your data, under which your payment may be rejected if a high probability of bank card fraud is detected. In this case, you can contact us at the address contact@pay-travel.com or by telephone on +33 1 89 71 90 73. An authorised person will then be able to examine your file and, if necessary, allow you to complete your payment transaction.
- Data category: your identification and bank card data, certain technical data relating to your electronic device, electronic identifiers and IP address.
 - Reasons for using this data (or legal basis): Evaneos and its financial partner have a legitimate interest in this control operation, which is to combat payment fraud. This interest is legal, legitimate and necessary to achieve the objective pursued.
 - Retention period: 2 years from the date of payment.
- **Managing your claims and disputes.** If you have any queries, you can contact us directly by email or telephone.
- Data category: your identification data, your location data and the connection data for your message.
 - Reasons for using this data (or legal basis): Evaneos has a legitimate interest in collecting data relating to your request in order to provide you with an efficient and rapid response.
 - Retention period: 4 years from the date your request is processed.
- **Managing your rights** when you ask to consult your personal data, delete it, correct it or object to certain processing operations.
- Data category: your identification data, dates of request and processing.
 - Reasons for using this data (or legal basis): Evaneos has a legitimate interest in collecting this data, which is to check that your request has been taken into account by our services and to keep proof of this operation carried out in accordance with your instructions.
 - Retention period: 5 years from the date your request is processed.

3. WHO DO WE SHARE YOUR DATA WITH?

Your Personal Data may be transmitted:

- Internally, to **authorised Evaneos departments** that have to intervene in the provision of the Paytravel Service.
- To the **Local Agency** to which your payment was made, which receives the information as to whether or not you have paid for the service.
- To the **Processors** used by our company to provide the Paytravel Service for the purposes mentioned above and, in particular, our financial partner for processing your payment orders and for verification and fraud prevention purposes.
- To **authorised third parties** such as the judicial and/or administrative authorities and court officers, in the limited cases provided for by law.

4. IS YOUR DATA SENT OUTSIDE THE EUROPEAN UNION?

Your Personal Data may be made accessible to some of our Processors within the meaning of the regulations, some of whom may be located outside Europe, in countries recognised by the European authorities as ensuring an adequate level of protection of Personal Data, but also in countries which do not benefit from such recognition. In order to ensure an adequate level of protection for the privacy of Data Subjects, Appropriate Safeguards have been implemented to govern the Transfers.

In particular, some of your Personal Data relating to your browsing habits or your IP address are made accessible, for the purposes of the security of our infrastructure, to our Processors located in the United States. These Processors are certified by the US Department of Commerce as part of the Transatlantic Framework for the Protection of Personal Data, recognised as offering an adequate level of protection by the European Commission. They therefore provide guarantees similar to those provided by European Union law.

5. DOES EVANEOS USE COOKIES OR OTHER TRACKERS AND FOR WHAT PURPOSES?

When you use the Paytravel Service, user information may be recorded by trackers or in "Cookie" files placed on your computer.

Evaneos and its partners use cookies and trackers to gain a better understanding of your use of the Paytravel Service and to improve it, implement security measures, or adapt the presentation of the Service to the characteristics of your terminal.

These cookies and trackers may be:

- **Technical and functional.** In this case, they are strictly necessary for the proper functioning of the Paytravel Service: these cookies are deposited on your computer without your consent and cannot be deactivated because this would disrupt the proper functioning of the Service.
- **Analytical:** this enables us to produce statistical analyses of visitor numbers and browsing patterns, thus enabling us to improve the Service.

6. WHAT RIGHTS DO YOU HAVE OVER YOUR DATA AND HOW CAN YOU EXERCISE THEM?

Please note that you have the right to access, rectify any inaccurate data concerning you and, in the cases provided for by the regulations, to object to or delete some of your Personal Data, to limit its use or request its portability with a view to its transmission to a third party, and also, if you reside in France, to define what becomes of your Personal Data after your death.

To exercise any of these rights, please contact the Evaneos DPO at data-privacy@evaneos.com or by post to the following address: 27 Rue de Mogador, 75009, Paris, France.

If, for security reasons, we are unable to identify you with certainty, you will need to enclose a photocopy of an identity document with your request. A reply will be sent to you within a maximum of one month from the date of receipt of your request, unless this period is extended under the conditions set out in the GDPR.

In addition, please note that Evaneos may, in accordance with the regulations, refuse to comply with certain requests concerning some of these rights (in particular the right of deletion), for legitimate reasons such as the need to defend rights in court or the requirements of a legal obligation to retain certain data.

You also have the right to lodge a complaint with the *Commission Nationale Informatique et Libertés* (CNIL).

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7. UPDATE AND MODIFICATION OF THE PRIVACY POLICY

We reserve the right to update or modify this data protection policy at any time. In the event of a substantial change, we will provide all Data Subjects with an email about this new purpose. This is to ensure that you have a reasonable time to exercise your rights under current legislation.

We nevertheless encourage you to consult the Privacy Policy on a regular basis so that you are aware of how your Personal Data is processed within the context of the Paytravel Service.