

Privacy Policy

Version 4.0

Last updated on: August 19, 2026

Effective from August 19, 2026

Beijing Xiuping International Travel Agency Co., Ltd. and its affiliates (hereinafter referred to as “We”), attaches great importance to the protection of your personal information and provides this Policy in order to explain to you how we process the personal information we received from our websites, mobile applications, WeChat Mini Program, Baidu mini program and other channels (“Platforms” or “Services”). This Policy applies to visitors to our websites and individuals who sign up for our Services (“Users” or “You”). Your personal information and privacy are very important to us. **Before using the Services We provide, please read this Policy carefully and confirm that You have fully understood all the contents of this Policy. Clauses that have significant impacts on your rights and interests are marked in bold.**

Special attention is drawn to children under the age of 14 and their guardians. We have a special chapter on the protection of children’s personal information, please read it carefully.

If You actively check or click “read and agree” when you register, log in or accept our Service, it means that you have read and fully accepted all the terms of this policy, and clearly know and agree that we will process your information in accordance with this Policy. If You do not accept all or part of the terms of this Policy, or cannot fully understand the meaning of all or part of the terms of this Policy, You should immediately stop using or registering or access our Services in other methods.

Please note that this policy does not restrict us from using or disclosing de identified or summarized statistical information when permitted by law.

This Policy will help you understand the following:

- 1. The application scope of this Policy and the bases for personal information processing*
- 2. How do We collect personal information? What personal information do We collect and use?*
- 3. How do We use the data collected?*
- 4. How do We use cookies?*
- 5. How long do We keep your personal data?*
- 6. How do We entrust third parties to process, share, transfer, and publicly disclose your personal data?*
- 7. The protection of your personal data by us*
- 8. What are your rights?*
- 9. How do We protect children's personal data?*
- 10. Will your personal data be transferred outside China?*
- 11. Notice of Change*
- 12. Contact Us*

1. The application scope of this Policy and the bases for personal information processing

This Policy informs you how your Data is collected, processed and used when:

- You book a stay on Platforms;
- You visit the website or our mobile application;
- You subscribe to our newsletter (information on products & special offers) and customised content;
- You contact our Customer Service Department;
- You take part in our member marketing activities, receive news-type notifications, customer care and questionnaires;
- When you participate in our advertising and marketing promotions;
- When you participate in our user behavior analysis;
- We collect information on the different products/services you choose; we also collect on the **orders information** during the use of the products/services on the platform. We collect such information to help you identify transactions, make payments, get notifications, help you check and manage your order information, and provide customer service and after-sales service; we also use your order information to determine whether there are any exceptions to your transactions to protect the security of your transactions.
- For some certain products/services you have selected, you are required to submit further necessary information to complete the booking, which you need to fill in yourself or authorize us to help you submit the information in other ways, and we also draw your attention during the specific booking process:
- When you book a hotel resort, depending on the type of service, you may need to provide different information: **name (including pinyin), gender, date of birth, email and contact cell phone number**; If you register for or agree to upgrade to be a member of our global “Great Members Program”, to deliver personalized offers and continue to provide you with membership system services such as member points and privileges, you will need to provide at least your name (including pinyin), gender, and date of birth. You may also choose to give us your email address so we can contact you more easily.
- When booking a ticket, depending on the type of service, you may be required to provide different information: **passenger name, (including pinyin), gender, nationality, date of birth, type of ID, and ID number, document expiry date and contact cell phone number**, and depending on the product, you may also be required to provide **contact email**. For some tickets, you will be required to complete the verification/registration process for your airline membership. On the above-mentioned verification/registration page, you will be required to provide at least your **email address, nationality, membership number and membership level**. You can also choose to provide us with your passenger mobile number to receive flight information or your airline membership number to receive mileage accrual services.

- When you book a pickup service, you may need to provide different information depending on the type of service. When you book a car rental service, you will need to provide at least **driver's name, cell phone number, type of ID, and ID number**. You may also choose to provide us with your travel flight number in order to receive a hold on your delayed vehicle for a limited period of time (subject to the rules indicated on the specific product/service page);
- When you use the in-store purchase service, you will need to provide your **cell phone number**;
- When the travellers include minor, we need you as a guardian or with the consent of the guardian to provide the **name, type of ID, and ID number of the minor**;
- For other products/services that require you to provide further necessary information to complete the booking, please read carefully as shown, prompted or authorized in the booking process.

In accordance with applicable laws and regulations, recommended national standards, etc., we shall obtain your consent (including your separate consent or written consent in accordance with relevant laws and administrative regulations) for the processing of your personal information, except in the following cases.

- (1) Necessary for the conclusion and performance of a contract to which you are a party;
- (2) Necessary for the performance of our legal duties or legal obligations;
- (3) Necessary to respond to a public health emergency or to protect the life, health, or property of natural persons in an emergency;
- (4) To process your personal information within a reasonable range for the purpose of carrying out news reporting, public opinion monitoring and other acts in the public interest;
- (5) In accordance with the provisions of the law to process your personal information within a reasonable range of your own disclosure or other already lawful disclosure;
- (6) Other circumstances as stipulated by laws and administrative regulations.

2. How do We collect personal information? What personal information do We collect and use?

2.1 Personal information you voluntarily provide

We may collect your Data when:

- You make a registration/log in by filling in the various forms relating to your account/membership account or by uploading Data;
- You book our products or services;
- You take part in marketing activities;
- You complete a questionnaire;
- You communicate with our Customer Service Department.

This Data may, for instance, consist of your:

- **Last and first name(s) (including pinyin);**
- **Date of birth;**
- **Gender;**
- **Mailing address;**
- **Email address;**
- **Telephone number(s);**
- **ID number;**
- **Means of payment;**
- **Booking history.;**
- **Travelers/family members' situation.**

The same applies for any information you provide about anyone for whom you book our products or services. In this respect, you agree to obtain their prior consent before disclosing their Data and ensure that they are aware of and accept this Policy. You may forward the hyperlink of this “Privacy Policy” to those for whom you book such products or services.

You may opt not to disclose certain information to us; however, this decision may prevent you from using our services. The required information for the provision of our services is identified with an asterisk in our information gathering forms.

We provide the following services that rely on appropriate information, including:

- (1) When you register as a user through the Platforms, we will ask you to provide registration information, including **cell phone number**, for SMS verification during registration.
- (2) When you register for or agree to upgrade to our global “Great Members Program,” we will ask you to provide your enrollment information, including your name (with pinyin), gender, and date of birth, so that we can offer you personalized benefits and continue to deliver membership services such as points and privileges.
- (3) When you book our products or services online, we need to collect your **name, age, cell phone number, ID number, address, family member information, etc.**
- (4) When you need to pay for a product or service, you may choose to pay through a third party payment institution (Alipay, WeChat payment, credit card and other payment channels), you may be asked to provide certain **financial information (such as your credit card information, Alipay information, WeChat payment information, etc.)** to advance the payment process. Your financial information is personal and sensitive, so please be careful in providing it.
- (5) We may collect your personal information, including your **WeChat avatar and nickname, cell phone number** to push our advertising and event promotional materials to you.

You may improve your profile information by providing information including **email address, address, etc.**, by providing us with the following information on your own. The information

you add will help us provide you with a better service and experience. If you do not provide this information, you may not be able to use specific features or services in the Service Offerings properly, but it will not affect the use of the basic features or services of the Service Offerings.

2.2 Your personal information automatically collected by us

When you use the Services, we may collect the following information to provide and improve the Services based on the preconditions of complying with current laws and safeguarding your rights:

- **The IP address, browser or device type, operating system you use when accessing our Services as well as websites you visited before using the Services, and the device identifier;**
- **Your browsing path and interaction with website content, such as page views, search keywords used, frequency of website visits, clicks on advertisements, etc.**
- Regarding device information and functions, the following are descriptions of device permissions for the use of WeChat or Baidu mini program:

Permissions	Permission Function	Usage scenario or purpose
Location	Locate the device via network or satellite	The location information obtained will be used to confirm the nearest resorts and initiate navigation to target locations such as resorts based on the current positioning
User avatar	Get nickname, avatar and other information by confirming authorization	To present your personal center in a more coordinated way, to identify you more clearly, and to provide customer service more easily
Phone number	Obtain cell phone number by confirming authorization	Uniform identification of you in other min program or on non-WeChat platforms
Calling	Call the system to make a call	Direct phone calls within the mini program for easy access to customer service
Microphone	Record Audio	For completing customer service voice consultation function
Notice	Receive notification	Receive notifications from WeChat/Baidu APP

2.3 Your personal information we collected from third parties

We may also collect your personal information from third parties, especially if you choose to bind to social media and log in through it. The personal data we collect may include your basic public information, such as your **WeChat nickname and avatar**. We use such information for identity purpose. In such case, your social media service provider may collect information about the social media login account you are using. It is recommended that you read the privacy policy of the social media service provider (such as WeChat) to understand their personal information protection policies.

3. How do We use the data collected?

We use your personal information to process your requests, provide membership services, manage our business relationships, and optimize our services and tools to create and maintain a safer environment and comply with our legal obligations.

3.1 Performing contracts between You and Us

We use your Data to manage your product or service booking and to perform various related services. In particular, we use your Data to process your payments, to inform you by text message, e-mail or other about how the contract you enter into with us is performed (information on your journey, any transport delays, extra services proposed, etc.).

3.2 Verify your identity in order to access your Account

We use the personal Data you provide to identify you in order to access your Account, access to which is restricted to authenticated persons. We also use the personal information you provide in relation to your membership to verify your member identity, enabling you to enjoy the relevant benefits and services.

3.3 Sending you our newsletter and customised content

If, on booking our products or services, setting up your account on the Website or thereafter, you ticked the box or filled in the form to receive the newsletter (information on products and commercial offers) and customised content, we may use your Data to send you the following, according to your preferences (in particular, by e-mail, text message, telephone or letter):

- Website newsletter;
- Invitations to events which may be of interest to you;
- Information on our offers;
- Information on updates to the Policy or security measures.

If you wish to stop receiving marketing offers and communications, you may contact us at any time at CRMChina@clubmed.com, or unsubscribe by clicking the profile icon in the upper-right corner of the official website homepage and navigating to *Personal Space* > *My Registration* > *Personal Information* to disable promotional messages or personalized recommendations. Alternatively, you may unsubscribe through the mini-program by navigating to *My Account* > *Privacy Center* and turning off personalized marketing recommendations. As the opt-out methods for personalized recommendations may vary across different applications, please refer to the notices displayed within the relevant application interface. You may also contact CRMChina@clubmed.com to obtain information on the applicable opt-out channel for a specific application.

We may also use your Data to send you advertising messages which may be of interest to you on third-party websites or on social media platforms. For more information, we suggest you read the terms relating to the use of your Data on these third-party websites and/or platforms.

3.4 For profiling purposes

We may also process your Data for profiling operations.

Profiling is the automated process of your Data to analyse, anticipate and assess your interests and preferences in order to send you customised content and commercial offers suited to your specific requirements.

3.5 Optimising the Website and our services

We use your Data to carry out analyses, technical tests (including the anonymisation of your Data) and data deduplication in order to improve and optimise the Website and customise our tools and services. This means, for example, ensuring that the display of our content is adapted to your device or hosting your Data on even more secured servers, etc.

3.6 Handling complaints

When you contact our Customer Service Department by telephone or using the contact form available on the Website or by any other means (social media, chat, etc.), we use your Data (including the recordings of your calls, with your prior consent) to:

- respond to and resolve your complaint;
- track and manage the follow-up of your complaint;
- improve customer service.

3.7 For internal statistics and surveys

We may use your Data to carry out various statistical analyses and/or to ask you to take part in our surveys.

3.8 Managing your participation in marketing activities

When you participate in **marketing activities**, you may provide us with a certain amount of Data. This Data is essential in order for you to participate and for us to award a prize.

With your prior and express consent, we may use this Data to send you newsletter (information on products and commercial offers) and customised content.

We will ask for your consent before using your Data for a purpose that isn't covered in this Privacy Policy or using the Data collected for a specific purpose for other purposes.

4. How do We use cookies?

4.1 What are cookies?

When you use the Website, We may place a text file called a “cookie” in the browser files of your computer (or tablet/pad, etc.). When enabled, these cookies are used to identify your computer on your next visit. Whenever you visit the Website, the settings from your previous visit are saved.

4.2 How do We use cookies?

We use the cookies listed in the appendix to the Policy.

a) Cookies needed to provide the services requested

We may have to use those cookies which are strictly necessary to provide you with requested services and/or information, including in particular:

- session ID cookies;
- shopping cart cookies;
- authentication cookies;
- load balancing session cookies;
- user interface customization cookies;
- analytic (or statistical) cookies.

Data collected from statistical cookies is not cross-checked with other data processed (or previously anonymised) and is only used to collect anonymous information about the user's behaviour on our Website.

These cookies are not used to follow users' surfing behaviour after visiting our Website nor are they used to geolocate a visitor.

You may block the placement of cookies, particularly statistical cookies (see "Disable cookies").

b) Improvement and customisation cookies

Certain cookies are used to analyse, optimise and customise your browsing experience. Cookies are also used to automatically process your Data in accordance with the terms and conditions specified in Section 3.3. Cookies are only placed on your device with your prior express consent.

When you browse the Website, third-party cookies (set by a communications agency, measurement company, targeted advertising service provider, etc.) may enable these third parties, during the cookie's lifespan, (i) to collect browsing information about our Website users and (ii) to post advertising content based on your interests. The setting and use of third-party cookies are subject to the cookie management policies of these third parties.

4.3 How do you disable/block cookies?

You may change your browser settings to disable/block cookies.

You may either accept all cookies or you can configure your browser to display a message when a server wants to store a cookie. You may also disable all cookies. Note that if you disable all cookies, you may not be able to access parts of our Website or use some of our services.

To disable cookies, follow the instructions provided in the appendix.

5. How long do We keep your personal data?

As a general rule, your Data is kept only for the time necessary to carry out the operations for which the Data was collected.

Depending on the Data category, We keep the Data for the following time periods:

- Prospects Data is kept for a maximum period of three years from the last contact they initiated with us;
- Personal data of members in previous Club Med China membership program who have a booking history will be kept and used for at least six years.
- Personal data of members in previous Club Med China membership program who have no booking history will be kept and used for at least three years.
- Personal data of members in the global “Great Members Program” who have a booking history will be retained and used for at least six years.
- Personal data of members in the global “Great Members Program” who have no booking history will be retained and used for at least three years.
- Data directly sent to us as specified in Section 2.1 is kept for the time necessary to process the Data;
- Data relating to customers who have subscribed to Easy Arrival service is kept for a period of three months after the end of the concerned stay;
- The recordings of phone calls with our sales teams are kept for a maximum period of one year;
- Banking Data is not kept after payment for your stay and/or the services ordered, except in the case where you have consented to their recording or in the event of recurring payment; in this case, it is kept for the duration of the contractual relationship;
- Data collected automatically through Cookies, including Browsing Data, is kept for a maximum of 13 months;
- Data relating to your participation in our charitable projects is kept for a duration of three years;
- Data relating to identity documents sent to us to exercise your right to access or rectify the Data is kept for a maximum of 12 months;
- Data relating to an incident is kept until the payment incident is resolved or, in the absence of such resolution, for a period of five years;
- Information provided to process a data subject’s exercise of its right to object to the receipt of electronic marketing is kept for a maximum of three years from the exercise of this right.

We may also delete your Data on request under the conditions set out in Section 8.

Note that on the expiry of these periods, and on receipt of your request to delete, your Data may be kept to comply with statutory, accounting and tax obligations and/or during the applicable limitation period and/or for the duration of any legal dispute.

6. How do We entrust third parties to process, share, transfer, and publicly disclose your personal data?

6.1 Entrust third parties to process

We may entrust third parties to provide certain specific modules or functions, for example we will hire service providers to assist us in providing customer support.

For companies, organizations and individuals that we entrust to process personal information, we will sign strict confidentiality agreements with them and require them to process personal information in accordance with our requirements, this Policy and any other relevant confidentiality and security measures.

6.2 Share

Generally, we do not share your Data with other companies, organizations, or individuals except in the following cases:

- We'll share your Data when we have your separate consent. We'll ask for your explicit consent to share sensitive personal information;
- We may share your Data in accordance with laws and regulations, or the mandatory requirements of the competent government authorities;
- We'll share your Data with our affiliates. However, we only share it on a need-to-know basis and will be bound by the purposes stated in the Policy and by applicable regulations. If our affiliates are to change the intended purposes for which they use your Data, they will seek your consent again;
- We may share your Data with our commercial partners, suppliers and/or data processors to ensure the smooth completion of our services. For instance, we do not have our own fleet of aircraft, trains or coaches. We are required to enter into contracts with various carriers to offer you ways of getting you to our various resorts. Accordingly, some of your Data (name, date of birth, ID number, etc.) will be provided to the carrier in order for it to issue you a travel ticket. However, we will only share your Data for legitimate, justified, necessary, specific, and explicit purposes, and will only share the Data necessary to provide the service.

When you choose services provided by our domestic resorts, We will share your personal information with Shanghai Club Med Holidays Travel Agency Co., Ltd., the operating entity of Club Med Group in the People's Republic of China in order to carry out and manage the booking business in China. For the privacy policy of Shanghai Club Med Holidays Travel Agency Co., Ltd., please refer to Club Med Privacy Policy. After obtaining your separate consent, Beijing Xiuping International Travel Agency Co., Ltd. will share your information with other parties. When you choose services provided by our overseas

resorts, We will share your personal information with Shanghai Club Med Holidays Travel Agency Co., Ltd., the operating entity of Club Med Group in the People's Republic of China and Shanghai Club Med Holidays Travel Agency Co., Ltd. will provide your personal information to VACANCES (S) PTE LTD, the sole distributor of Club Med overseas resorts in order to carry out and manage the booking business outside China. For the privacy policy of VACANCES (S) PTE LTD, please refer to https://ns.clubmed.com/esap/2021/362/PDF/SG_Privacy_Policy_2020.pdf?_ga=2.199959597.266143407.1686279203-2059411888.1684227082&_gac=1.181594837.1684481660.CjwKCAjwvJyBhApEiwAWz2nLTFBITDwW8URYfz6fDXeH2FmQrgvnAddZ8OsMwgK66yUcLfVc7F1VRoCaycQAvD_BwE. When you choose to register or consent to upgrade to our global “Great Members Program,” we will share your personal information with Club Med’s China operating entity, Shanghai Club Med Holidays Travel Agency Co., Ltd., which will in turn provide it to the headquarter of Club Med group, Club Med SAS, to enable the operation and management of the global “Great Members Program.” For details, please refer to Club Med SAS’s Personal Data Protection Charter.

- We will enter into strict non-disclosure agreements with all companies, organizations and individuals with which we share your Data, requiring them to process your Data according to our instructions, this Policy and any other related confidentiality and security measures;
- In order for you to receive information push, booking notifications, and a better booking experience exclusively for you, our mini program will embed software development kits ("SDK") or similar applications from our authorized partners. We use these SDKs through the interface provided by the operating system.

SDK	Provider of SDK	Scenarios	Type of information collected	Link of privacy policy or security instructions
All buried events (automatically recorded after initialization)	Shence Network Technology (Beijing) Co., Ltd.	All buried events	Device ID, authorization information, mobile phone number, email address, name, birthday, gender	https://www.sensorsdata.cn/compliance/privacy.html
Manually trigger track events	Shence Network Technology	order related events after	Device ID, authorization	https://www.sensorsdata.cn/compliance/privacy.html

(order related events after initiating payment)	(Beijing) Co., Ltd.	initiating payment	information, mobile phone number, email address, name, birthday, gender, order information	
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Please note that the developer documents or personal information protection policy/privacy policy pages in the above links are drafted and published by the respective SDK developers/providers. The relevant SDK developers/providers may change or adjust the links and the contents of the linked pages within the scope of the law, please refer to the latest published links and the contents of the linked pages by the relevant SDK developers/providers. We will conduct strict security technology testing and access control on the SDKs of our authorized partners. Our partners do not have the right to use your personal information shared for any other purposes, and if they want to change the purpose of processing personal information, they should ask for your authorized consent again.

6.3 Transfer

We will not transfer your Data to any company, organization or individual, except in the following cases:

- We'll transfer your Data to other parties when we have your express consent;
- When it comes to mergers, acquisitions or bankruptcy liquidations, if it involves the transfer of Data, we will require the new company or organization which hold your Data to be bound by this Policy, otherwise we will require the company or organization to obtain your consent again.

6.4 Disclosure

We will make available your Data to the public only under the following conditions:

- With your express consent;
- With legal reasons: we may publicly disclose your Data if it's required by law, legal processes, litigation or the competent government authorities.

7. The protection of your personal data

We make our best reasonable efforts to protect your Data, including by taking reasonable physical, organisational and logistical measures necessary to prevent the disclosure, destruction or missing of such Data and by ensuring secure access only to those persons authorised to process the Data. However, no method of transmission over the Internet or method of electronic storage is 100% secure and thus we cannot guarantee its absolute security.

8. What are your rights?

We attach great importance to your concern for Data and makes every effort to protect your right to access/copy, correct/supplement, transfer, delete or restrict the processing of your personal data, as well as to cancel your account, and withdraw consent to use, your Data, so that you have full capacity to protect your privacy and security. These rights are set out below.

8.1 The right to access and correct/supplement your Data

Unless provided by laws and regulations, you have the right to access to and correct your Data at any time by sending an email to CRMChina@clubmed.com.

8.2 The right to obtain a copy of your personal information

You have the right to obtain a copy of your personal information by sending an email to CRMChina@clubmed.com. If you require a copy of the personal information we have collected about you, we will respond to your request, subject to the relevant legal requirements and technical feasibility, at a cost to you, as appropriate.

8.3 Transfer of Your Personal Information

You have the right to request the transfer of your personal information by sending an email to CRMChina@clubmed.com. We will respond to such requests provided that:

- (1) the requester's identity can be verified;
- (2) the information to be transferred was provided with your consent or collected under a contract;
- (3) the technical feasibility of the transfer is confirmed; and
- (4) the transfer does not infringe upon the lawful rights and interests of any third party.

Please note: if the number or frequency of transfer requests is manifestly unreasonable, we may charge a reasonable fee based on the administrative costs incurred.

8.4 Change the scope of your authorized consent or withdraw your authorization

You have the right to change the scope of your authorized consent or withdraw your authorization by sending an email to CRMChina@clubmed.com. Please understand that certain functions require basic personal information to be completed and that if you change or withdraw

your consent or authorization, we may not be able to continue to provide you with the services for which you have changed or withdrawn your consent or authorization and may no longer process your corresponding personal information. However, your decision to change or withdraw your consent or authorization will not affect the processing of personal information that we have previously performed based on your consent or authorization.

8.5 The right to delete your Data

Under any of the following circumstances, you may request us to delete your Data by sending an email to CRMChina@clubmed.com:

- When our processing of Data violates laws or regulations;
- When we collect or use your Data without your consent;
- When our processing of Data violates our agreement with you;
- When you no longer use our services, or cancel your user account; or
- When we no longer provide you with any services.

When you delete information from our services, we may not delete the corresponding information in the backup system immediately, but we will delete the information when the backup is updated.

8.6 Restricting Our Processing of Your Personal Information

You have the right to request that we restrict the processing of your personal information by emailing CRMChina@clubmed.com. We will respond to your request in the manner and within the timeframes set out in this Policy.

8.7 The right to cancel your account

You have the right to cancel your account by sending an email to CRMChina@clubmed.com.

8.8 Responding to your requests

If you would like to access, correct or delete your Data, or if you believe that there is any violation of laws and regulations or any agreement with you regarding the collection or use of Data, you can send an email to CRMChina@clubmed.com. For the sake of security, you may be required to file written requests or prove your identification in other ways. We will respond to your request within reasonable time (within 15 working days). We may reject those requests that are duplicative, require excessive technical means, pose risks to the legitimate rights and interests of others, or are fairly unrealistic.

Please note that we may need to retain certain Data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or reservation, you may not be able to change or delete the Data provided until after the completion of such purchase or reservation). There may also be residual Data

that will remain within our databases and other records, which will not be removed. In addition, there may be certain data that we may not allow you to review for legal, security or other reasons.

9. How do We process children's data?

If you are a child, we suggest you ask your parents or guardians to read this Policy carefully and use our services or provide us with the Data, with the consent of your parents or guardians.

For the Data of child collected with the consent of parents, we will only use or publicly disclose it when permitted by laws, explicitly consented by the parent or guardian or required for protecting the child.

We treat anyone under the age of 14 as a child.

10. Will your personal data be transferred outside China?

As we provide services through entities, resources and servers around the world, and we also operate a global membership program, this means that, with your consent, **your personal Data related to your purchase and use of our products and services, including name, age and mobile number**, as well as the personal information you provide when you register for or agree to upgrade to the global “Great Members Program” (including your name with pinyin, gender, date of birth, and email address) may be transferred to or accessed by Club Med SAS, the headquarter of Club Med Group, through Shanghai Club Med Holidays Travel Agency Co., Ltd., the operating entity of Club Med Group in the People’s Republic of China or VACANCES (S) PTE LTD, the sole distributor of Club Med overseas resorts, a company duly incorporated in accordance with the laws of France and once collected, in order to check booking file information and help you to complete the booking procedure, or to provide you with membership-related benefits and services. If you need to claim your rights against Club Med SAS, please contact dpo@clubmed.com. your Data will be stored on the servers of our service provider which is IBM located in France. But we will ensure that your Data is protected in accordance with local regulations and the agreements between us and Club Med SAS which provides protection levels at least to those provided for in China.

11. Notice of Change

This Policy may be amended and updated from time to time, consistent with the requirements of the applicable laws and regulations regarding data protection. But we will not reduce your rights under this Policy without your express consent. We will issue the amended or updated version of the Privacy Policy on our website for you to get aware of the latest Privacy Policy. We will also notify you of the changes in the Policy through pop-up windows when you log in our website, push notifications when you use our services, email or in other appropriate ways. <https://clubmed-cdn.dmdigital.cn/ucenter/questions/240925.docx>

12. Contact us

If you have any questions or comments about this Policy, or if you would like to correct, amend, or delete the Data that we may maintain about you, please contact us by send a letter to 15F, Building 1, No.118, Feihong Road, Hongkou District, Shanghai, China. We have set up a full-time department for personal information protection. You can contact the person in charge through the following address: 16F, Building 1, No.118, Feihong Road, Hongkou District, Shanghai, China.

Email: CRMChina@clubmed.com

Appendix:

List of Cookies

This list is updated regularly; last updated on April 14, 2021

Editor: Beijing Xiuping International Travel Agency Co., Ltd.

Purpose: Cookies and data strictly necessary for the operation of the site

Cookie retention period: 25 months maximum

Editor: AB Tasty 2.0

Purpose:

- Create a profile to display personalized content
- Develop and improve products
- Measure content performance
- Select personalized content
- Store and / or access information on a terminal

Cookie retention period: 25 months maximum

Editor: AntVoice

Purpose:

- Create a personalized advertising profile
- Measure the performance of advertisements
- Select personalized advertisements
- Select standard advertisements
- Store and / or access information on a terminal

Cookie retention period: 25 months maximum

Editor: Atlas

Purpose:

- Create a personalized advertising profile
- Create a profile to display personalized content
- Develop and improve products
- Use market research to generate audience data
- Measure the performance of advertisements
- Measure content performance
- Select personalized advertisements
- Select standard advertisements
- Select personalized content

- Store and / or access information on a terminal
- Cookie retention period: 25 months maximum

Editor: BIDSWITCH GmbH

Purpose:

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- Measure the performance of advertisements
- Measure content performance
- Select personalized advertisements
- Select standard advertisements
- Select personalized content
- Store and / or access information on a terminal
- Use precise geolocation data

Cookie retention period: 25 months maximum

Editor: Bing Ads

Purpose:

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- Select personalized advertisements
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- Select personalized content
- Store and / or access information on a terminal

Cookie retention period: 25 months maximum

Editor: Content Square (CS)

Purpose: Audience measurement and monitoring of the performance of digital journeys

Cookie retention period: 25 months maximum

Editor: Critizr

Purpose: Personalization and optimization of your browsing and our content

Cookie retention period: 25 months maximum

Editor: Facebook

Purpose: Store and / or access information on a terminal

Cookie retention period: 25 months maximum

Editor: Freespee

Purpose:

- Monitoring the performance of omnichannel journeys
- Audience measurement and monitoring of the performance of digital journeys
- Personalization and optimization of your browsing and our content

Cookie retention period: 25 months maximum

Editor: Google Analytics (GA)

Purpose:

- Audience measurement and monitoring of the performance of digital journeys
- Personalization of our advertising on the sites of our partners

Cookie retention period: 25 months maximum

Editor: Google Cloud Privacy (GCP)

Purpose:

- Monitoring the performance of omnichannel journeys
- Audience measurement and monitoring of the performance of digital journeys
- Creation of a user profile for personalization and targeting purposes

Cookie retention period: 25 months maximum

Editor: Google Advertising Products

Purpose:

- Create a personalized advertising profile
- Select personalized advertisements
- Store and / or access information on a terminal
- Create a profile to display personalized content
- Develop and improve products
- Use market research to generate audience data
- Measure the performance of advertisements
- Select standard advertisements
- Select personalized content

Cookie retention period: 25 months maximum

Editor: Microsoft (Bing Ads)

Purpose:

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Cookie retention period: 25 months maximum

Editor: Outbrain UK Ltd

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Cookie retention period: 25 months maximum

Editor: Pinterest

Purpose:

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- Select personalized content
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Cookie retention period: 25 months maximum

Editor: Silverpop

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 - Measure content performance
 - Select personalized advertisements
 - Select standard advertisements
 - Select personalized content
 - Store and / or access information on a terminal
- Cookie retention period: 25 months maximum

Editor: Sizmek by Amazon

Purpose:

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 - Develop and improve products
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 - Measure the performance of advertisements
 - Select standard advertisements
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Editor: Sojern, Inc.

Purpose:

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Editor: Taboola Europe Limited

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Editor: Teads

Purpose:

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- Measure the performance of advertisements
- Select standard advertisements

Cookie retention period: 25 months maximum

Editor: The Trade Desk

Purpose:

- Create a personalized advertising profile
- Select personalized advertisements
- Store and / or access information on a terminal
- Use precise geolocation data
- Develop and improve products
- Measure the performance of advertisements
- Select standard advertisements

Cookie retention period: 25 months maximum

Editor: TradeDoubler AB

Purpose:

- Create a personalized advertising profile
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Cookie retention period: 25 months maximum

Editor: TripAdvisor LLC

Purpose:

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- Select standard advertisements
- Select personalized content

Cookie retention period: 25 months maximum

Editor: Wihp

Purpose:

- Audience measurement and monitoring of the performance of digital journeys
- Personalization of our advertising on the sites of our partners

Cookie retention period: 25 months maximum

Editor: Xandr, Inc.

Purpose:

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- Use precise geolocation data
- Develop and improve products
- Measure the performance of advertisements
- Select standard advertisements

Cookie retention period: 25 months maximum

Editor: Youtube

Purpose:

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- Measure the performance of advertisements
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- Select personalized advertisements
- Select standard advertisements
- Select personalized content
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Cookie retention period: 25 months maximum

HOW ARE COOKIES DISABLED?

You may change your browser settings to disable/block cookies.

You may either accept all cookies or you can configure your browser to display a message when a server wants to store a cookie. You may also disable all cookies. Note that if you disable all cookies, you may not be able to access parts of our Website or use some of our services.

To disable cookies:

>> If you use Internet Explorer 8 and following:

1. Go to “Tools” in the menu bar and click on “Internet Options”
2. Click on the tab “Non-disclosure” on top
3. Slide the cursor up to the setting “Block all cookies” to block all cookies or slide down to the setting “Accept all cookies” to accept all cookies.

For further information, consult <http://windows.microsoft.com/fr-fr/internet-explorer/delete-manage-cookies>

>> If you use Firefox 30.0 and following:

1. Click on the button “menu” and select “Options”
2. Select the panel “Privacy”.
3. In the history area, for the option “Retention rules”, select “use customised settings for the history”.

4. Tick the space “Accept the cookies” to activate the cookies or untick it to disable it.

If you have problems with the cookies, ensure that the option “Accept third party cookies” is not positioned on Never.

5. Choose how long the cookies may be retained.

Retain them until: “Their expiry”: Each cookie will be deleted on its expiry date, date set by the website issuing the cookie.

Retain them until: “Closing of Firefox”: cookies enabled on your computer will be deleted when you close Firefox.

Retain them until: “Ask me each time”: a warning shows each time a website wishes to send a cookie, asking you if you agree to enable the cookie or not.

6. Click OK to close the “Options” window

For more information, consult <https://support.mozilla.org/fr/products/firefox/privacy-and-security/cookies>

>> If you use Google Chrome:

1. Go to the menu “Tools”
1. Click on “Settings”
2. Click on “Advanced settings”
3. Click on “Non-disclosure/Content settings”
4. “Cookies” must be selected. Then select “Block cookies and third party website data”

For more information, consult <https://support.google.com/chrome/answer/95647?hl=fr>

>> If you use Safari 5.0:

1. Choose Safari > Preferences and click on “Security”.
2. In the section “Accept cookies”, specify if and when Safari must accept cookies of websites. For an explanation on options, click on the help button (looks like a question mark). If you have set Safari to block cookies, you should perhaps temporarily accept cookies to open a page. Repeat the above stages, by selecting “Always”. When you have finished with the page, disable the cookies again and delete cookies from the page.

For more information, visit http://support.apple.com/kb/ht1677?viewlocale=fr_FR

If you have a different browser type or version, see your browser’s “Help” menu.

Third-party sharing list

SN	Third party's name	Purpose of processing/application scenario	Data sharing	Sharing method	Official website/Privacy Policy/contact information
1.	Shanghai Branch, Guangdong Meiya Tourism Technology Group Co.,Ltd.	Ticket booking	Guest's personal information (name, gender, adult/child, ID, certificate type and number, birthday, nationality, mobile phone number, email)	Transfer passenger's personal information via API for booking	https://www.meiya.com/
2.	China Eastern Airlines Corporation Limited and its subsidiary China United Airlines	Ticket booking	Guest's personal information	Manual transfer	https://www.ceair.com/ https://www.flycua.com/
3.	Shanghai Chunqiu Travel Agency Co., Ltd.	Ticket booking	Guest's personal information	Manual transfer	https://www.springtour.com/
4.	Juneyao Airlines Co., Ltd.	Ticket booking	Guest's personal information	Manual transfer	https://www.juneyaoair.com/home
5.	Tengxuan (Beijing)	Ticket booking	Guest's personal information	Manual transfer	tengxuantrip.com

	International Travel Agency Co., Ltd.		information		
6.	Shanghai Jiangling Aviation Service Co., Ltd.	Ticket booking	Guest's personal information	Manual transfer	Room 418-Z2362, Building 1, 1000 Zhenchen Road, Baoshan District, Shanghai
7.	Changzhou Branch, China Pacific Property Insurance Co., Ltd.	Ticket booking	Customer's personal information	Manual transfer	281 Guanghua Street, Zhonglou District, Changzhou, Jiangsu Province
8.	Tencent Technology (Shenzhen) Company Limited	Used to adjust advertising strategies to achieve more accurate advertising to target users	Customer's behavior data A total of five behavior logs (Browsing the resort details page, clicking the order button, submitting the order, completing the payment, and registering as a local member)	Transferred via API from the background of WeChat mini program to Tencent platform	https://weixin.qq.com/cgi-bin/readtemplate?lang=zh_CN&t=weixin_agreement&s=privacy

			Fields included in the data: Tencent platform UnionID : Tencent platform user ID Event : name of behavioral event Time : behavior time		
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