PRIVACY POLICY FOR THE PROTECTION OF PERSONAL DATA

Club Med Sales Canada Inc., registered under No. 1145934932 in Quebec, Canada, (hereinafter "**Club Med**" or "**We**"), attaches great importance to the protection of your personal data and carefully monitors compliance with protective provisions relating to privacy and the processing of personal data, in particular *the Personal Information Protection and Electronic* Documents Act (PIPEDA, federal law), the *Act respecting the protection of personal information in the private sector, as amended by Bill 25*, it being specified that Club Med Sales Canada Inc. is a subsidiary of Club Med SAS, a company incorporated under French law, subject to the General Regulation on the Protection of Personal Data (EU Regulation 2016/679 of April 26, 2016), (hereinafter the "**Legislation in force**").

The purpose of this personal data protection charter (hereinafter the "**Charter**") is to describe how and when Club Med, as data controller, collects, uses and communicates certain personal data (hereinafter the "**Data**") that you send to it in order to meet your needs but also to optimize and improve the quality of the services that we offer you.

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1. IN WHAT CIRCUMSTANCES DOES THIS CHARTER APPLY?

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

- you book a package holiday with Club Med;
- you visit the Club Med website(s) or our mobile application(s) (hereinafter, together, the "**Site**");
- you subscribe to Club Med news (product information & promotional offers) and personalized content;
- you contact our customer relations department;
- you participate in our competitions;
- you fill in our forms;
- you use our virtual assistants and our other artificial intelligence-based tools;
- you communicate with us via WhatsApp.

2. WHAT DATA IS COLLECTED BY CLUB MED?

2.1 Information you provide to us directly

You provide us with Data, in particular:

- when you register on the Site by completing various forms relating to your account or by uploading Data;
- when you subscribe to a package holiday;
- when you participate in a competition;
- when you complete a Club Med questionnaire;
- when you communicate with our customer relations department;
- when you chat with us via WhatsApp;
- when you interact with our virtual assistants or our other artificial intelligence-based tools.

This information may, for example, include:

- your first and last name(s),
- your date of birth,
- your gender,
- your postal address,
- your email address,
- your phone number(s),
- your means of payment,
- your health data (to a limited extent, in connection with the reservation of equipment and the consideration of your allergies, in order to ensure your safety and that of others, in particular in our villages)
- your booking history.

The same applies to all information you provide to us relating to the people for whom you are booking a package holiday. You agree here to obtain their prior consent to the communication of their Data.

You can choose not to provide us with certain information; however, this decision may deprive you of some of the services and features we offer. Information essential to the provision of our services and features is identified by an asterisk on our collection forms.

2.2 Data collected automatically

When you browse the Site, Club Med may collect, in strict compliance with Current Legislation and your rights, Data relating to:

- the characteristics of the operating system, browser or devices (computer, tablet, smartphone) that you use to access our services;
- your location, such as your IP address;
- your browsing path and your interactions with the content of the Site, such as the pages visited, the search keywords used, the frequency of your visits to the Site, the advertisements on which you click.
  This browsing Data is collected in particular using cookies. For more information about these cookies, please refer to Article 4.

In addition to the cookies and other trackers placed on our sites, Club Med may use trackers embedded in certain marketing emails, in particular tracking pixels and click-tracking links.

These trackers may allow Club Med and its technical service providers to know whether you open our marketing emails, when you view them and whether you click on the links they contain, as well as to obtain certain information about the device used to view these emails.

This information is used to measure the effectiveness of our communications, to produce delivery statistics, to personalize the content of our messages, to adapt the frequency of sending or the communication channel used, and to better understand your interests in order to offer you more relevant content and offers. These trackers are used on the basis of your prior consent, except for strictly necessary trackers, such as those found in transactional emails relating to your booking or your account, and those used for the technical measurement of the deliverability of our emails, limited to the management of our mailings and without any marketing use.

3. HOW DO WE USE THE DATA WE COLLECT?

3.1 Data from other sources

We may also collect Data through third parties, including social networks, when you use the account you hold with these third parties to register or log in to our services. During this use, you are informed of the Data transmitted to us by the third party concerned.

We use, store and process your Data in order to process your requests, manage our business relationship, optimize our services and tools to create and maintain a more secure environment of trust, as well as to comply with our legal obligations as we specify below.

3.2 To perform contracts entered into between us

We use your Data to enable the management of your registration for a package holiday and the performance of the various related services.

Your Data will be used in particular to collect your payments, inform you by SMS, email or any other means of communication on the terms of performance of the contract that binds us (information on your trip, on possible transport delays, on your "*Great Members*" loyalty program, proposal of additional services to your package holiday, etc.).

As part of our business, we may use business partners who provide certain services on our behalf.

For example, we do not have our own fleet of planes, trains or buses. We are therefore obliged to conclude contracts with carriers in order to be able to offer you transport to our villages. As a result, some of your Data (surname, first name, date of birth, etc.) will be transmitted to the carrier so that it can issue your transport ticket.

However, our business partners may not use your Data for purposes other than those necessary to perform the services you have requested. Finally, they are required to process it in strict compliance with Current Legislation.

The health data that you provide to us (in particular your allergies) is processed in order to ensure your safety and that of others, in particular in our villages.

When you speak with us by telephone during a conversation involving an insurance offer or sale, the conversation is recorded in order to comply with our regulatory obligations. These recordings are kept under the conditions set out in Article 5.

3.3 Provide you with access to the Site and certain services

The Data that you provide allows us to identify you in order to access your space on the Site (hereinafter the "**Customer Area**"), access to which is reserved for authenticated persons.

3.4 Send you Club Med news and personalized content

If, when booking a package holiday, creating your account on the Site or subsequently in the Customer Area, you have consented to receive Club Med news, product information, promotional offers and personalized content, we may use your Data to send you these communications, according to your preferences, in particular by email, SMS/WhatsApp, telephone or postal mail.

When these communications are sent to you by email, they may contain tracking pixels and click-tracking links. These trackers allow us in particular to measure the opening of our emails, the clicks on the links they contain, the time of viewing and certain information about the device used.

This data allows us to measure the effectiveness of our campaigns, to adapt the content of our messages to your interests, to adjust the frequency of our communications and, where applicable, to adapt the communication channel used.

This use is based on your prior consent where the trackers are not strictly necessary for the provision of the requested service or for the technical management of our mailings. You may withdraw your consent to personalized commercial communications and the associated trackers at any time via the link provided for this purpose in our emails.

The unsubscribe link in our emails ends our commercial communications by email and withdraws your associated consents (prospecting, profiling).

We may also use your Data to send you advertising messages that may be of interest to you on third-party sites or social media platforms. For further information on this subject, we invite you to read the conditions relating to the use of your Data directly on these third-party sites and/or platforms.

3.5 For profiling purposes

Subject to your consent, we may process your Data as part of profiling operations.

Profiling consists of automated processing operations of your Data which aim to analyze, anticipate and evaluate your interests and preferences in order to send you personalized content and commercial offers adapted to your specific needs.

These profiling operations may in particular be based on data from your interactions with our marketing emails, such as the opening of our emails, the clicks on the links they contain, the time of viewing, the device used or the topics viewed.

Club Med may call on technical service providers to determine your profile and preferences with greater precision, in order to send you more relevant content and promotional offers. Under no circumstances does Club Med communicate your Data to commercial partners for their own prospecting purposes.

You may, at any time, withdraw your consent or object to the use of your Data for profiling purposes by accessing your Customer Area or by contacting us using the methods described in Article 8.4 below.

3.6 Optimize the Site and our services

We use your Data to carry out studies, technical tests (which may involve anonymization of your Data), deduplications, which allow us to improve and optimize the Site and to personalize our tools and services. For example, this will involve ensuring that the display of our various contents is adapted to the device you are using, or allowing us to host your Data on even more secure servers, etc.

3.7 Process your complaints

When you contact our customer relations department by telephone, via the contact form available on the Site or via any other means made available to you by Club Med (social networks, chat, etc.), we use your Data (including recordings of your calls, of which you are informed by a prior message and to which you may object) to:

- respond to you and provide a solution to your complaint;
- ensure and manage the follow-up of your complaint;
- improve the customer relations service.

3.8 For internal statistics and survey purposes

We may use your Data to carry out various statistical studies and/or ask you to participate in our own surveys**.**

3.9 Ensure compliance with the law and court decisions

Your Data may be used to:

- respond to a request from an administrative or judicial authority, a law enforcement representative, an officer of the court or comply with a court decision;
- ensure compliance with our general terms and conditions of sale and the Charter;
- protect our rights and/or obtain compensation for any damage we may suffer or limit its consequences;
- prevent any action contrary to the laws in force, particularly in the context of preventing the risk of fraud.

3.10 Manage your participation in competitions

When you participate in a competition, you provide us with a certain amount of Data. It is essential for your participation to be taken into account and, where applicable, for the prize to be awarded.

Furthermore, with your prior and express consent, we may use this same Data to send you Club Med news (product information and promotional offers) and personalized content.

3.11 Manage your participation in solidarity projects identified by the Club Med Corporate Foundation

When you participate in the "Friends of the Club Med Foundation" fundraising campaign, which collects financial donations from our customers wishing to support the solidarity projects identified by the Club Med Corporate Foundation, you provide us with a certain amount of Data. It is essential for taking your participation into account and, where applicable, for issuing your tax receipt.

3.12 Use artificial intelligence-based tools

Some of the tools we offer, in particular our virtual assistants, rely on artificial intelligence ("AI") technologies. We clearly inform you, at the start of the conversation, when you are interacting with such a tool, and you may at any time ask to speak with a Club Med sales advisor. Your Data is used only for the purposes described in this Charter, and we require our service providers not to use it to train their own AI models. Our use of AI is defined in the Fundamental Principles for the Use of Artificial Intelligence by Club Med, available at the following address: https://www.clubmed.fr/l/principes-fondamentaux-de-l-utilisation-de-l-intelligence-artificielle. You may exercise your rights under the conditions set out in Article 8.

4. WHAT COOKIES ARE USED BY CLUB MED?

Club Med uses cookies and other trackers on its websites. To learn more about the use of these cookies and to configure them, please consult our charter relating to trackers via the "Cookies" link in the footer of our sites.

The lifespan of the cookies placed on our sites does not exceed 13 months. The information collected through these cookies is kept for a maximum period of 25 months from its collection. We ask our service providers, who publish these cookies, to comply with these periods, in particular under the contracts that bind us.

5. HOW LONG DO WE KEEP YOUR DATA?

Generally speaking, your Data is kept only for the time necessary to carry out the operations for which it was collected.

Here are the different retention periods for Data collected by Club Med:

- Data relating to prospects is kept for a maximum period of 3 years from the last contact they initiated with Club Med;
- Data relating to customers who have subscribed to a package holiday is kept for a period of 4 years after the end of the contractual relationship with Club Med, which expires at the end of the "*Great Members*" loyalty program (more information by clicking on the "Great Members Program" link on the Club Med Site);

- Data relating to your customer account (Customer Area) is kept for as long as your account exists; you may request its deletion at any time under the conditions set out in Article 8;
- Bank details are not kept after payment of your package holiday and/or the services ordered, except where you have given your consent for them to be saved or in the case of recurring payment, in which case they are kept for the duration of our contractual relationship. The security code (CVV) of your card is never kept;
- Data collected automatically through Cookies, including Data relating to browsing, is kept for a maximum period of 25 months from its collection, the lifespan of cookies not exceeding 13 months;
- Data relating to your participation in solidarity projects identified by the Club Med Corporate Foundation is kept for a period of 3 years;
- Data relating to identity documents that you send to us when you exercise your right of access or rectification is kept for a maximum period of 12 months;
- Data relating to an incident that resulted in your inclusion on the Club Med incident list is kept until the payment incident is resolved or, in the absence of such resolution, for a period of 5 years;
- information allowing the rights of data subjects to object to receiving commercial prospecting to be taken into account is kept for a maximum period of 3 years from the exercise of this right;
- Data relating to WhatsApp conversations, including those with our virtual assistants, is kept for a period of 6 months;
- Data relating to the recordings of your calls, excluding conversations involving an insurance offer or sale, is kept for a period of 1 year;
- Data relating to the processing of your complaints is kept for a period of 1 year from the closure of the complaint;
- recordings of telephone conversations involving an insurance offer or sale are kept for a period of 24 months from the conversation.

The retention periods for Data processed in our villages may vary depending on the villages and local regulations. For more information, you can use the contact details provided in Article 8.4.

We may also delete your Data upon your request under the conditions set out in Article 8.

However, at the end of the aforementioned periods, including your request for deletion, your Data may be archived in order to meet our legal, accounting and tax obligations (e.g. obligation to keep invoices for 10 years in accordance with Article L. 123-22 of the French Commercial Code) and/or during the applicable limitation period and/or in the event of contentious proceedings for the duration of said proceedings.

6. WHAT ARE THE CATEGORIES OF RECIPIENTS OF YOUR DATA?

We may share your Data with various third parties, including:

- with our affiliated entities in order to provide you with the requested services or acting as a subcontractor in compliance with Current Legislation;
- our business partners, suppliers and/or subcontractors who process your Data on our behalf and according to our instructions, or as data controllers for the purposes detailed in Article 3 (in particular transport companies, insurance companies, customs authorities, incoming service providers, financial institutions, advertising and social media platforms, artificial intelligence solution providers, technical subcontractors, etc.). We take particular care to ensure that these third parties provide sufficient guarantees to ensure the protection and security of your Data;
- to duly authorized French or foreign authorities, particularly in the context of legal action or a request for communication of information.

7. ON WHAT LEGAL BASES IS YOUR DATA PROCESSED?

In accordance with Current Legislation, to process your Data, we rely on different legal bases, including:

- your prior and express consent to the processing of your Data for one of the purposes referred to in Article 3;
- the performance of the contract that binds us;
- the need to comply with a legal obligation or to defend ourselves in the event of legal proceedings;
- the legitimate interest pursued by Club Med.

The table below specifies the legal basis applicable to the main purposes described in this Charter:

Purpose	**Legal basis**
Management of your booking and performance of the contracts entered into between us (Article 3.2)	Performance of the contract that binds us
Access to the Site and to your Customer Area (Article 3.3)	Performance of the contract that binds us
Sending our news and personalized content, including measuring email opens and clicks (Articles 2.2 and 3.4)	Your prior consent
Profiling (Article 3.5)	Your prior consent

Purpose	Legal basis
Optimization of the Site and our services (Article 3.6)	Club Med's legitimate interest in improving its services and securing its tools
Processing of your complaints, including the recording of your calls (Article 3.7)	Club Med's legitimate interest in responding to your requests and improving customer relations (you are informed of the recording and may object to it)
Internal statistics and surveys (Article 3.8)	Club Med's legitimate interest in measuring and improving its activity
Compliance with the law and court decisions (Article 3.9)	Legal obligation; Club Med's legitimate interest in defending its rights and preventing fraud
Competitions (Article 3.10)	Performance of the competition rules; your prior consent for commercial communications
Solidarity projects of the Club Med Corporate Foundation (Article 3.11)	Performance of your donation process; legal obligation for the issuance of the tax receipt
Artificial intelligence-based tools (Article 3.12)	Performance of pre-contractual measures or of the contract where the tool responds to your request; Club Med's legitimate interest in assisting you and improving the quality of its service
Health data, in particular your allergies (Articles 2.1 and 3.2)	Your explicit consent; in an emergency, protection of your vital interests or those of another person where you are unable to give consent
Recording of conversations involving an insurance offer or sale (Article 3.2)	Regulatory obligation
Cookies and other trackers placed on our sites (Article 4)	Your prior consent, except for trackers strictly necessary for the service you request

8. WHAT ARE YOUR RIGHTS?

8.1 Your rights of access, rectification, deletion, limitation and objection

You can ask us to access, correct, update, limit or erase personal information about you.

You also have the right to object to the processing of your Data.

Where processing is based on your consent (in particular for sending personalized commercial communications, profiling, email open and click tracking pixels and the processing of your health data), you may withdraw this consent at any time, without affecting the lawfulness of processing carried out before such withdrawal.

Where Current Legislation so provides, you also have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

8.2 The right to portability of your Data

The right to portability gives you the possibility of recovering part of the Data which concerns you, namely:

- the Data that you have transmitted to us directly as detailed in Article 2.1;
- the Data generated by your activities on the Site as detailed in Article 2.2.

We will endeavor to respond to your request within a reasonable time and, in any event, within the time limits set by Current Legislation.

8.3 Define guidelines on the fate of your Data

You have the right to define general or specific guidelines relating to the retention, deletion and communication of your Data post-mortem.

8.4 Contact

To exercise all of these rights, you can send an email to the following address: **dpo.canada@clubmed.com**, stating "exercise of my rights" in the subject line of your email.

If we have reasonable doubt about your identity, we may ask you for additional information necessary to confirm your identity.
At any time, if you believe that your rights have not been respected, you have the right to lodge a complaint with the Club Med Data Protection Officer (DPO), whose contact details are: DPO - Customer Relations Service, 11 rue de Cambrai, 75957 Paris Cedex 19, France *dpo@clubmed.com*.

8.5 Right to lodge a complaint with the competent Data Protection Authority

You can also, at any time, lodge a complaint with the competent data protection authority (In Québec, la Commission d'accès à l'information : site accessible ici).

9. IS YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

We may transfer your Data to countries outside the European Union for the sole purposes described in this Charter.

For each of these transfers, we ensure that your Data benefits from a level of protection equivalent to that offered in Europe.

Transfers may be made to countries that are recognized as ensuring an adequate level of Data protection by the European Commission.

Data may be transferred to a country that does not offer an adequate level of protection, particularly if your package holiday takes place in such a country. In such a case, Club Med and its partners or service providers undertake to supervise the transfer by means of appropriate safeguards (such as the standard contractual clauses of the European Commission) which you can request from the DPO address indicated above.

10. PROTECTION OF YOUR DATA BY CLUB MED

Club Med undertakes to guarantee the integrity and reliability of the Data entrusted to it, in particular by taking all necessary physical, organizational and logistical measures to prevent any alteration or destruction of said Data, in particular by ensuring secure access only to persons authorized to process it.

11. REVISION OF THE CHARTER

Club Med may be required to modify this Charter, in particular if Current Legislation changes. Any changes will be posted on the Site or notified to you by email.

Version updated on October 19, 2026