

**In accordance with CNIL policy, this document provides users with clear, understandable, and concise information on the privacy policy and cookies policy applicable to the processing of your personal data.**

## **PRIVACY POLICY**

### **How useful is this policy?**

Digitrips attaches great importance to the protection and confidentiality of your personal data, which represent for us a pledge of seriousness and trust. The Privacy Policy specifically reflects our willingness to enforce compliance within Digitrips with applicable data protection rules and, in particular, with the General Data Protection Regulation ("GDPR"). In particular, the privacy policy aims to inform you about how and why we process your data in connection with the services we provide.

### **Who is this policy for?**

The policy applies to you, regardless of where you live, as long as you are at least 15 years old and are user of our platform. If you are under the legal age detailed above, you are not authorized to use our services without the prior and explicit consent of one of your parents or the holder of parental authority, which must be sent to us by email at [dpo@digitrips.com](mailto:dpo@digitrips.com). If you believe that we are holding personal data about your children without your consent, please contact us at the dedicated address detailed above.

### **Why do we process your data?**

To provide our services, we have to process your personal data for:

- To use and benefit from our service and all its features on the basis of our general terms of use.
- To provide user account management (e.g., account creation, service access, and account deletion) based on our Terms of Service.
- To determine your location when you use our service in order to provide you with a personalized and tailored service, based on your consent.
- To receive our technical emails and SMS (e.g.: modification of passwords, notifications, alerts, etc.) essential to the proper functioning of our service on the basis of our general conditions of use.
- To ensure and enhance the security and quality of our services on a day-to-day basis (e.g., statistics, data security, etc.) based on our legal obligations, our terms and conditions of use and our legitimate interest in ensuring the proper functioning of our services.
- To manage your returns and our customer service on the basis of our general terms and conditions of use.
- To send satisfaction surveys based on our legitimate interest of improving our services.

Your data is collected directly from you when you use our platform and we undertake to process your data only for the reasons described above.

### **What data do we process and for how long?**

We have summarized the categories of personal data that we collect and their respective duration of retention. If you wish to obtain further details on the retention periods applicable to your data, you can contact us at: [dpo@digitrips.com](mailto:dpo@digitrips.com). For private individuals, personal identification data (e.g. surname, first name) and contact details (e.g. email address) are kept for the entire duration of the provision of the service, plus the statutory limitation periods, which are generally 5 years.

- Geolocation data retained for 2 months.
- Email address and phone number to receive our technical messages by email and SMS kept until your account is deleted.
- Voice retained during telephone conversations for up to 6 months.
- Connection data (e.g. logs, IP address, etc.) kept for a period of 1 year.
- Cookies which are generally retained for up to 13 months. For more details on how we use your cookies, you can consult our cookies policy accessible at any time on our platform.
- For the mobile application, geolocation data kept for a period of 2 months.

For the mobile application, we also process your personal data to locate your location when you use our service in order to offer you a personalized and tailored service, in particular to inform you of points of interest according to your location as well as to track your movements for security reasons, based on your consent.

Once the retention periods described above have expired, the deletion of your personal data is irreversible, and we will no longer be able to provide it to you after this period. At most, we may only retain anonymous data for statistical purposes.

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Please also note that in the event of litigation, we are required to retain all of your data for the duration of the processing of the case even after the expiration of the retention periods described above.

### **What rights do you have to control the use of your data?**

The applicable data protection regulations give you specific rights that you can exercise, at any time and free of charge, to control how we use your data.

- Right of access and to obtain a copy of your personal data as long as this request is not in opposition with business secrecy, confidentiality, or the secrecy of correspondence.
- Right of rectification of personal data that are incorrect, obsolete or incomplete.
- Right to object to the processing of your personal data implemented for commercial prospecting purposes.
- Right to request erasure ("right to be forgotten") of your personal data that are not essential to the proper functioning of our services.
- Right to the restriction of processing your personal data which allows you to freeze the use of your personal data in case of dispute about the lawfulness of a processing.
- Right to ask for the portability of your data which allows you to download part of your personal data in order to store it or transmit it easily from one information system to another.
- Right to provide guidelines on the fate of your data in the event of your death either by you, a trusted third party or an heir.

To be considered, your request has to be done by you only at the address [dpo@digitrips.com](mailto:dpo@digitrips.com). Any request that does not follow this process cannot be treated. Requests cannot be made by anyone other than you. Therefore, we may ask you to provide proof of identity if there is any doubt about your identity. We will respond to your request as quickly as possible, within one month of receipt, unless the request is complex or repeated. In this case, the response time may be up to three months. Please note that we may always refuse to respond to any excessive or unfounded request, especially if it is repetitive.

### **Who can access your data?**

Your personal data can also be transferred to our service providers for the sole purpose of technically operating our service (e.g. data host) as well as by our commercial partners (e.g. airlines, hotels, etc.). As part of our services, we may transfer some of your data to our subsidiaries. We specify that we audit every service provider before recruiting them in order to verify that they are strictly complying with the applicable rules regarding personal data protection. We guarantee that we will never transfer or sell your data to third parties or commercial partners.

### **How do we protect your data?**

We implement all the technical and organizational means required to guarantee the security of your data and, in particular, to fight against any risk of destruction, loss, alteration or unauthorized disclosure of your data (e.g. training, access control, passwords, etc.).

### **Can your data be transferred outside the European Union?**

Personal data processed by our platform is exclusively hosted on servers located within the European Union. Furthermore, we do our utmost to use only technical tools whose servers are also located within the European Union. However, if this is not the case, we scrupulously ensure that they implement the appropriate guarantees required to ensure the confidentiality and protection of your personal data.

### **How do we protect your personal data?**

We implement the following technical and organisational means to guarantee the security of your personal data on a daily basis and, in particular, to combat any risk of destruction, loss, alteration, or disclosure.

Technical security measures	Organizational Security Measure
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<p>Antivirus on the terminals of the Digitrips teams, Anti-spam for the terminals of the Digitrip teams, Database of user passwords (on the "Back" side) separated from the identifiers, Password of the terminals of the Digitrips teams frequently changed, Complex password of the terminals of the Digitrips teams, HTTPS protocol, PCA / DRP for the Digitrips teams, Penetration tests, Access traceability, VPN for the Digitrips teams, Double authentication and 1Password, There is none., There is none.</p>	<p>Access badge, Information systems charter, Password management policy, Awareness and training of teams 2 times a year, Video protection on the premises</p>
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### **Do we use cookies when you use our platform?**

We inform you that we use cookies when you use our platform. For more information, please consult our Cookie Policy.

### **Who can you contact for more information?**

We have officially appointed an outsource and independent Data Protection Officer ("DPO") to our supervisory authority in order to ensure the safety and confidentiality of your personal data. You can contact our DPO at any time and free of charge at [dpo@digitrips.com](mailto:dpo@digitrips.com) in order to obtain more information or details on how we process your personal data.

### **How can you contact the CNIL?**

You may at any time contact the "Commission nationale de l'informatique et des libertés" or "CNIL" at the following address: CNIL Complaints Department, 3 place de Fontenoy - TSA 80751, 75334 Paris Cedex 07 or by phone at 01.53.73.22.22.

### **Can the policy be modified?**

We may change our Privacy Policy at any time to adapt it to new legal requirements as well as to new processing that we may implement in the future.

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## **COOKIES POLICY**

### **What is the purpose of the Cookies Policy?**

Digitrips Travel attaches great importance to the confidentiality of your data which represents for us a pledge of seriousness and confidence, no matter whether it is about cookies or personal data. The cookies policy aims to explain to you why we use cookies as well as any other type of trackers when you browse our platform.

On the other hand, this cookies policy only concerns the processing related to the deposit of cookies and tracers. For the other treatments that we carry out, please consult our data confidentiality policy, accessible at any time on the platform.

### **What is a cookie and what is its purpose?**

Cookies and other trackers are small "text" files placed and hosted by a server on your smartphone, tablet, or computer when you visit a platform.

Cookies do not identify you personally but identify your terminal (e.g. smartphone, tablet, etc.) via your IP address, as well as various information related to your browsing (e.g. browsing time, pages viewed, size of your screen etc.).

### **What are technical cookies and why do we use them?**

The proper functioning of our platform necessarily involves the use of technical cookies, which we may use without your prior consent, based on our legitimate interest in providing you with a functional platform.

For example, a technical cookie enables us to remember the language of your platform as well as the format of the platform on your browser to facilitate future connections and navigation.

Although we do not recommend it, you can always prevent these cookies from being deposited on your terminal using your browser settings by following the instructions below: [Chrome](#), [Microsoft Edge](#), [Safari](#), [Firefox](#) and [Opera](#).

In this case, however, your user experience may be impaired. To restore your browsing experience,

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you will need to reset your technical cookies.

### **What are statistical cookies and why do we use them?**

A statistical cookie is used to analyze your use of a platform (e.g. browsing time, pages visited, etc.) to improve your experience and provide you with a service tailored to your needs. For our platform, we use non-exempt statistical cookies which can only be placed on your terminal with your prior consent expressed via our cookies banner.

### **What are advertising cookies and why do we use them?**

An advertising cookie can be used either to provide advertising on a web platform or to identify the source of the user's arrival on the web platform (e.g. Google, Bing, etc.). We guarantee that we do not use any advertising cookies for the operation of our platform.

### **What personal data do we process with our cookies and for how long?**

The personal data processed by the cookies we use are:

- Your IP address and a user ID that we create when you first connect to recognize you for a maximum period of 13 months.
- if you accept the deposit of statistical cookies, your personal data relating to your browsing in our platform (e.g. pages visited, browsing times, etc.) for a maximum period of 13 months, which cannot be renewed before any new connection before the 14th month.

Once the retention periods specified below have expired, we do not retain any data about you. At the most, we may anonymize your data for statistical purposes.

### **How do you control the use of cookies?**

You can refuse cookies at any time using our cookies banner. In the event that the cookies banner is no longer displayed, you can also configure cookies via the "manage cookies" tab on our site or directly on your browser by following the instructions below: [Chrome](#), [Microsoft Edge](#), [Safari](#), [Firefox](#) and [Opera](#).

### **What rights do you have to control the use of your personal data used via cookies?**

The applicable data protection regulations grant you specific rights that you can exercise, at any time and free of charge, in order to control the use, we make of your data.

- Right to access and copy your personal data, provided that this request does not conflict with business secrecy, confidentiality, or the secrecy of correspondence.
- Right to rectify any personal data that is incorrect, obsolete, or incomplete.
- Right to request the deletion ("right to be forgotten") of your personal data that is not essential for the proper functioning of our services.
- Right to the limitation of your personal data, which allows the use of your data to be photographed in the event of a dispute over the legitimacy of a processing operation.
- Right to the portability of your data which allows you to recover part of your personal data to store it or transmit it easily from one information system to another.
- Right to give instructions on the fate of your data in the event of your death either through yourself, a trusted third party or a beneficiary.

For a request to be considered, it must be sent directly by you to [dpo@digitrips.com](mailto:dpo@digitrips.com). Any request that is not made in this way cannot be processed. Requests cannot come from anyone other than you. We may therefore ask you to provide proof of identity if there is any doubt about the identity of the person making the request. Please note that we can always refuse to respond to any request that is excessive or unfounded, particularly in view of its repetitive nature.

### **Can your personal data used via our cookies be transferred outside the European Union?**

The statistical cookies we use may send your IP address and user ID outside the European Union to function. In this case, we guarantee that these tools comply strictly with the applicable rules on transfers to guarantee confidentiality and adequate protection of your personal data.

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### **Can the policy be modified?**

We may change our Cookie Policy at any time to adapt it to new legal requirements and to new processing operations that we may implement in the future.