

## **Information on the processing of personal data of travelers**

Your Tour Operator provides you the TRAVEL EYE service which allows you to receive alerts when you are on a business trip or while on expatriation. This service is organized by us, as well as the company EXOP which provides the platform.

This information notice describes how your Personal Data is collected and processed when you use this service.

### **Data Controller and Data Processor**

The Data Controller, as defined by the General Data Protection Regulation 2016/679 of April 27, 2016 (GDPR), is your Tour Operator.

To contact your Tour Operator's data protection officer, please refer to the information provided by the latter for this purpose.

If you wish, you can also contact our data protection officer whose reference contact has been provided in the Information Notice.

### **Data categories**

Your persona data, which can be collected and processed within the framework of the TRAVEL EYE service, are the following:

- Your private or professional identity and contact data (surname, first name, address, e-mail addresses, telephone number, etc.),
- Data related to your trips (destinations, accommodation, meeting places, routes, means of transport, travel time, etc.),
- location information and geo-location data (GPS location data actively transmitted once or continuously by you),
- Your status data (alerts, special alerts, status requests, etc.),
- Data related to the computer use of the platform (user ID, roles, permissions, connection time, IP address, etc.).

This data can be communicated directly by you. In some cases, they can also be legitimately received from third parties, for example travel agencies, from access to the PNR list. Provided that you have previously given your authorization, they may come from a connection to your professional calendar or from geolocation.

### **Purpose of processing**

The purpose of processing is to:

- Provide you with information and advice on risks and security in the countries where you are or plan to be on a trip, especially by reports of global incidents but also alerts and security analyzes,

- Anticipate crises that may occur during your stay in these same countries and the emergency plans to be implemented,
- If necessary, organize emergency assistance services.

### **Legal basis**

This processing is justified by the legitimate interest of your Tour Operator to meet its security obligations towards its travelers.

### **Data recipients**

Your Personal Data may be transmitted to companies and / or to people who contribute to the proper performance of the service (such as IT service providers) or subsequently to your assistance provider if necessary.

They may be communicated to the supervisory authorities, to the competent public services as well as to any other public or private body with which we may be required to exchange personal data in accordance with the applicable regulation.

### **Location of your data**

The platform on which your Personal Data is processed is located within the European Union in Germany, Belgium and Luxembourg.

Your data is not intended to be transmitted to countries outside the EU or the EEA.

### **Obligation to communicate Personal Data**

As a general rule, we only process information which is necessary for the conclusion or execution of the contract which we have signed with your Tour Operator, in your interest, or which is necessary for the proper execution of a law. Without this information, we would periodically be unable to offer you the information services referred to above, and, if necessary, the security assistance services provided for in the contract signed by your Tour Operator.

Unless this is prescribed or required by contract or applicable law, you are not obliged to provide us with any personal data relating to you. You will not suffer any negative consequences by not voluntarily providing us with personal data. However, in certain individual cases, failure to communicate such data to us may delay or prevent communication with you, or even delay, hinder or prevent the provision of specific services such as security assistance.

### **Data conservation duration**

Data related to your trips will be anonymized 30 days after the end of your trip.

The data linked to your computer use of the platform (connection data, contact data, etc.) will be deleted no later than six months after your deletion as a user of the platform.

The status data will be anonymized at the latest six months after their creation.

All other data will be erased without delay after the end of the business relationship with our partner (your Tour Operator), unless legal obligations prevent such erasure. In this case, your personal data will be erased at the end of this legal obligation and the limitation periods for initiating a complaint.

### **Your rights as a data subject**

If one of the grounds listed by the GDPR applies, you can request from the Data Processor:

- (i) confirmation that your Personal Data is or is not being processed and, if applicable, a copy of this Personal data
- (ii) the correction of any inaccurate or incomplete Personal Data
- (iii) the erasure of your Personal Data or the limitation of their processing.

You have the right to:

- (i) withdraw your consent at any time, without prejudice to the processing carried out lawfully before the withdrawal of that, when the processing of your Personal Data is based on your consent
- (ii) contest, for reasons related to your personal situation, to the processing of your Personal Data based on the legitimate interests of the Data Processor
- (iii) benefit from the transferability of your Personal Data
- (iv) not to be subject to a decision based exclusively on an automated processing, including profiling, that legally affects you or seriously affects you.