

Policy for the protection of data relating to clients and prospects

ADT Béarn Pays Basque

1. PURPOSE

As part of its mission to develop and promote the Bearn-Pays Basque tourism offering, the Agence d'attractivité et de développement touristique Béarn Pays Basque must process the personal data of its clients, partners and contacts (prospects).

The purpose of the present policy is to comply with our obligation to inform you and remind you of your rights with respect to personal data.

2. DATA COLLECTED

The data about you that we are likely to process are the following:

- Identity and identification (surname, first name, date of birth, alias, client number),
- Contact details (email address, postal address, phone number)
- Professional life (position held, job description, employer's name)
- Personal life where necessary (family composition, age of children, holiday preferences)
- Technical data (identification, login, acceptance and, where appropriate, geolocation data).

3. DATA ORIGIN

We collect data from the following sources:

- Data that you provide to us directly in various ways (paper or online forms, order forms, contracts, business cards, etc.),
- Data transmitted when you sign up or subscribe to our online services (newsletter),
- Data collected when you sign up to events we organise,
- Data from databases shared by several tourism providers, who jointly build and use them,
- Data from databases that have been rented or acquired on a one-off basis,
- Data transmitted by our partners and organisers of events in which we take part, or by specialised companies.

4. LEGAL BASIS

The data processing that we perform under the present policy has as its legal basis:

- The performance of a contract with our clients/partners,

- The implementation of precontractual measures taken at the request of our contacts,
- Consent, when the law so requires,
- The legitimate interest of our organisation.

5. OBJECTIVES

We process your personal data for the following reasons:

- Performance and management of our contracts and service provisions,
- Management of relations and exchanges with our clients, partners and contacts,
- Sale of tourist packages either directly or via distributor partners,
- Operations to promote the ADT and tourism in the Bearn-Pays Basque territory,
- Accreditations of sites and facilities on behalf of official national labels,
- Tourism engineering operations,
- Networking and dialogue with our partners,
- Training of our partners,
- Searches for distributor partners,
- Compliance with our administrative obligations,
- Coordination of websites with our partners,
- Sending of newsletters or news feeds,
- Community management,
- Organisation of events,
- Improvement of our services,
- Production of statistical reports.

6. RECIPIENTS

Recipients of your data may be internal or external depending on the case:

- Internal recipients are all our authorised staff members who serve our clients, partners and contacts;
- External recipients are:
 - o Tourism providers who have access to shared databases which may contain your data,
 - o External service providers or support services,
 - o Authorised personnel of inspection services (statutory auditors),
 - o Administrations or court officers where applicable.

7. LENGTH OF DATA STORAGE

Your data are stored for a limited period which we determine in light of the legal and contractual requirements that bind us and, failing this, according to our needs. The following principles apply:

- Data on clients: stored for the duration of contractual relations with us, plus 5 years (legal prescriptions),
- Data on partners and contacts: stored for 3 years starting from the last contact with the partner or contact,
- Technical data: 1 year from collection,
- Cookies: 13 months from their deposit.

8. YOUR RIGHTS

You have the following rights as regards your personal data:

- A right to ask us for confirmation that data about you are being processed, to have access to these data and to ask for a copy of them;
- A right to have any erroneous or obsolete data about you rectified;
- A right to have your data deleted if you do not want them to be processed for canvassing purposes;
- A right to portability of your data when they are processed on the basis of the performance of a contract, when you yourself have provided us with your data and when they are automatically processed;
- A right to give instructions on the processing of your data post-mortem.

Any request to exercise your rights must come exclusively from you and be made in writing to the following address: AaDT64 – DPO – 2 allée des Platanes – 64100 BAYONNE.

9. SECURITY

We use what we consider to be the appropriate technical and organisational measures to prevent the destruction, loss, deterioration or unauthorised disclosure of data about you.

In the event of data violation, we undertake to notify the CNIL under the conditions provided by the GPRD.

If said violation presents a high risk for our clients/prospects, we undertake to inform those concerned and to send them the necessary information and recommendations.

10. DPO

Should we appoint a Data Protection Officer, we undertake to transmit his or her contact details to you.

11. CROSS-BORDER FLOWS

We reserve the right to deploy cross-border flows outside of the EU of the data we process, and you will be informed of this. In such cases, we will ensure that your rights are respected and will sign, if necessary, one or more contracts governing these flows with the recipient country or countries.

12. REGISTER OF PROCESSING OPERATIONS

When the regulations so require, we keep an up-to-date register of processing operations and place it at the disposal of the CNIL.

13. CNIL CONTACTS

As authorised by law, you may lodge a complaint with the CNIL at the following address: Service des plaintes de la Cnil, 3 place de Fontenoy – TSA 80751, 75334 Paris Cedex 07, or by telephone: +33 153 73 2222

14. REVISION

In the event of changes to the regulations or of recommendations from the CNIL, we reserve the right to amend the present policy. We will notify you of any new policy prior to its entry into force.