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## OCRE & AZUR HOTELS' PRIVACY POLICY

### Introduction

This privacy policy explains how OCRE & AZUR HOTELS use your personal data when you visit our website, interact with us and purchase our goods and services. You will also find the description of your right to privacy and how you are protected under law.

It is important that you read this privacy policy, and any other privacy policy that we provide you with, so that you are aware of the reasons why we use your data and how we use it.

If you have any questions or wish to exercise your right to privacy, please follow the instructions contained in this privacy policy. See below: How to contact OCRE & AZUR HOTELS about the privacy policy.

### I. **The types of personal data that we collect about you**

The terms personal data and personal information designate all information about an individual serving to identify them. This does not include information for which the identity is hidden (anonymous data).

We collect a variety of information about our marvellous customers and visitors to the following secure websites:

<https://www.hotels-ocre-azur.com/>

<https://hotels-ocre-azur.secretbox.fr/>

<https://www.hotel-avignon-horloge.com/>

<https://www.hotel-cannes-canberra.com/>

<https://www.hotel-nice-suisse.com/>

This personal data is divided into different categories:

**Identity data** consists of your title, first name, family name, user name or similar user ID, as well as an encrypted version of your user name/password. If you interact with us via social media, your user name on these might be included.

**Contact data** consists of your billing address, delivery address, email address and telephone numbers.

**Financial data** consists of the details of your charge card.

**Data related to the transaction** consists of the details of your payments and refunds, and of the products and services that you have purchased from us.

**Profile data** consists of your user name and password, your purchases and orders, your preferences, returns and answers to surveys, as well as any profile data added by us (for example, data obtained by the use of analytical and profiling tools).

**Technical data** consists of your IP address, your login data, your browser type and version, your time zone and location, your browser plug-in types and versions, your operating system and platform, and other technologies on the devices that you use to access this website.

**Usage data** consists of information concerning the way you use our websites, products and services.

**Tracking data** consists of the information that we, or any other party, collect concerning you using cookies and similar tracking technology such as web beacons, pixel tags and mobile identifiers.

**Marketing and communication data** consists of your preferences regarding reception of advertising from us, and your preferences concerning communication.

We also collect, use and share **aggregated data** such as statistical and demographic data, for any purpose whatsoever.

Aggregated data may come from your personal data, but is not legally considered as such, since this data does not directly reveal your identity. For example, we might aggregate your usage data in order to calculate the percentage of users who access a specific function of the website. We use the Google Analytics analysis service in order to provide better content on the various OCRE & AZUR HOTELS' websites.

Please [consulter leur politique de confidentialité](#).

However, if we combine aggregated data with your personal data in such a way that they identify you directly or indirectly, we will treat this combined data as personal data which will be used in accordance with the terms of this privacy policy.

We do not collect special categories of personal data (this includes details of your ethnic origin, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect information relating to offences or convictions. If you use this type of personal data, be aware that we undertake to never sell, communicate or share your contact details with any other commercial enterprise unless legally obliged to do so: non-payment, non-reception of a bank transfer, public insults... Please bear in mind that if you choose to not share your personal data with us or if you refuse certain contact authorisations, we will not be able to respond to any of your requests.

## **II. Methods of collecting your personal data**

We use various methods to collect information about you, including:

Direct interaction. You can provide your identity data, contact data and financial data by filling out our forms or by contacting us by letter, telephone, email, live chat or social media.

This includes the personal data that you give us when you:

- register to receive our newsletter;
- ask questions or request information;
- create an account on our website;
- order our products or services;
- contact us on social media;
- take part in a competition, promotion or survey;
- contact customer services; or
- leave comments or reviews on our products or services (please be kind!).

Third party sources, or those accessible to the general public. We might receive personal data concerning you from various third parties, including:

- technical data and/or tracking data from providers of analytical solutions, advertising networks or information providers;
- financial data, contact data and data related to the transaction from providers of payment services and fraud prevention services;
- data from any third party legally entitled to share your personal data with us or to whom you have given permission to do so, such as social media and feedback sites.

## **III. Purpose and legal grounds for using your personal data**

We will use your personal data in accordance with applicable legislation only. Generally, your personal data will be used in the following cases:

- In order to **fulfil the contract** that we have entered into or are about to enter into with you. For example, when you purchase our products, this constitutes a contract.
- When it is necessary to protect our **legitimate interests** (or those of a third party), and your interests and fundamental rights do not override them. For example, when we carry out anti-fraud checks during the payment process.
- When we have to **comply with possible legal or regulatory obligations**. For example, in keeping sales records in accordance with tax regulations.

In general, we do not operate with **consent** as the legal basis for processing your data, except when this is required by law, for example when sending direct marketing communications. When the legal basis is consent, you have the right to withdraw your consent at any time.

Explanations of the legal bases governing the use we make of your personal data.  
We use your data only in the situations listed below:

New customer:

To record you as a new customer we collect your identity and contact information, which are mandatory for fulfilling a contract.

To process and deliver your orders:

We use your identity data, financial data and transaction data in order to handle payments, costs and expenses as well as for collecting and receiving moneys due to us. Mandatory for fulfilling a contract, and for protecting our legitimate interests.

Newsletters:

We use your data in order to send you direct marketing communications

Complaints and service tracking:

Allows us to resolve your complaints and to track our service; we use all the categories of data required to assist you.

Website improvement:

Allows us to analyse your behaviour on our website and to focus on certain points to improve or amend, allows us to understand the anonymous behaviour of all visitors. We collect your technical data and usage data on our website.

#### **IV. Recipients of personal data**

Your personal data may be handled by the Ocre & Azur Hotels group. We may also share this data with third parties involved during the sale, transfer or merger of part of our business or our assets. Likewise, we may seek to acquire other businesses. If our company is modified, the new owners may use your personal data according to the criteria defined in this privacy policy.

Your personal data may also be shared with the third parties indicated below for the purposes defined by this privacy policy, in compliance with the relevant legislation.

Your personal data may be shared with the following categories of third parties:

- the government, regulatory bodies and the police;
- service providers and suppliers (such as technology providers, payment processing and fraud prevention providers);
- auditors and professional advisors such as bankers, solicitors, accountants and insurers.

You can ask the data controller whose contact details are shown in this document for the detailed list of these third parties.

Your personal data is shared with the following specified third parties:

- Sarbacane, our direct mailing provider.

We require that all third parties guarantee the security of your personal data and process it in accordance with the law. We do not allow our third-party providers to use your personal data for their own purposes. They only have the right to use your personal data for specific purposes, in accordance with our instructions.

#### **V. Possible cross-border flows**

Your personal data may be transferred to and processed in countries outside the European Union.

When this is the case, the company undertakes to ensure that your personal data is handled by the recipient in compliance with protection provided by the legislation governing personal data.

#### **VI. Safety of your personal data**

We have introduced appropriate safety measures to protect your personal data from accidental loss and from unauthorised use, modification and access. Furthermore, access to your personal data is limited to employees, agents, contractors and other third parties on a need to know basis. They will treat your personal data in accordance with our instructions and are subject to an obligation of confidentiality.

We have introduced procedures to handle any presumed breach of privacy concerning your personal data. You and all competent regulatory authorities will be notified of any such breach when required by law.

#### **VII. Period for which your data is stored**

Your personal data is kept only for as long as necessary to fulfil the purposes for which it was collected. This includes legal, accounting and declaratory requirements.

In order to determine the appropriate period for storing your personal data, we consider the quantity, nature and sensitivity of this data, the potential risk of prejudice caused by non-authorized use or disclosure, the purpose for which it is processed and the possibility of achieving this purpose by other means, and the relevant legal requirements.

In accordance with the law, notably for tax purposes, we must keep basic information about our customers (including contact data, identity data, financial data and data related to transactions) **for six years from the moment they cease to be our customers.**

After this period, the company undertakes to delete your personal data.

In certain situations, you may ask us to delete your data. Read “Your statutory rights”.

However, if we make your personal data anonymous (so that it can no longer be associated with you) for statistical or research purposes, we can use it indefinitely, without any further notification.

#### **VIII. Your statutory rights**

In accordance with data protection legislation, you have the following rights concerning your personal data:

- **Right of access:** this is the right to request access to your personal data in order to receive a copy of the personal information that we possess about you;
- **Right to rectification:** the right to ask us to rectify personal information about you that may be incomplete or inaccurate;
- **Right to erasure,** also known as the “right to be forgotten”: in certain cases, you can ask us to delete all the personal information that we have about you (unless there is a compelling legal reason that forces us to keep it);
- **Right to restriction of processing:** in certain cases you have the right to ask us to suspend processing of your personal data;
- **Right to data portability:** you have the right to ask us for a copy of your personal data in a standard format (for example a CSV file);
- **Right to object:** you have the right to object to your personal data being processed (for example by not permitting us to process your data for direct marketing purposes).

Exercising one of these rights may, according to the situation, impede conclusion or fulfilment of a contract.

We may ask you for specific information in order to confirm your identity and allow access to your personal data (or to exercise any other right). This is a security measure to guarantee that this personal data is not divulged to an unauthorised person. We may also contact you to obtain further information about your request, in order to provide a faster response.

We try to respond to all legitimate requests within a month. This one-month time frame may be exceeded if your request is particularly complex or if you have made several requests. If this occurs, we will warn you and keep you informed.

## **IX. The data controller's contact details**

For any question concerning this privacy policy, or to exercise one of your rights, please contact us by email at the following address: [rgpd@hotels-ocre-azur.com](mailto:rgpd@hotels-ocre-azur.com) or by letter addressed to:

Les HOTELS OCRE & AZUR, service RGPD  
77/79 Bd de la République,  
06400 Cannes - FRANCE

If you require help concerning our products and services, or the websites in general, [contact us here](#).

The company reserves the right to update this privacy policy for legal, commercial or technical reasons. Information will be provided on any major change, and your consent will be asked for whenever legally required.

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