

GENERAL PROTECTION POLICY OF PERSONAL DATA

CEETRUS wishes to make its website (hereinafter the "**Site**") available to visitors (hereinafter the "**Data Subjects**"). This Site offers you the possibility to learn about CEETRUS' activities.

However, the use of our service may involve the transmission of your personal data.

This document explains in all transparency the rules of implementation of the processing of personal data carried out within the framework of the use of the Site:

- This document provides a framework for the processing of data collected via our Site
- This document is also intended to govern the processing of data collected via cookies and other tracers (hereinafter referred to as "**Cookies**"). It is understood that **this processing only concerns you if you have accepted the deposit of cookies**. You will find more information in the dedicated [cookie policy](#).

CEETRUS is responsible for the processing. By means of this General Policy for the Protection of Personal Data, it undertakes to :

- Ensuring ethical and responsible use of your personal data;
- Respect the provisions of Regulation (EU) No. 2016/679 of 27 April 2016, known as the "**RGPD**", Law No. 78-17 of 6 January 1978 on information technology, files and freedoms, known as the "**Information Technology and Freedoms**" law, in its latest version in force, as well as the standards laid down by the CNIL;
- To provide you with details of the processing of personal data carried out in the context of activities associated with the use of this Site;
- To guarantee you an effective exercise of your rights on the personal data collected thanks to cookies and tracers concerning you

1. CEETRUS: DATA CONTROLLER

CEETRUS is responsible for the processing of personal data implemented on the Site at the following url: <https://www.ceetrus.com>.

CEETRUS is responsible for the data processing as it determines the means and purposes of the processing. The data is collected through contact forms and cookies.

In this respect, we guarantee that the persons concerned comply with the specific legal and regulatory provisions relating to cookies.

In any case, CEETRUS can be reached at any time, and for any type of request, at the following address

CEETRUS FRANCE is a simplified joint stock company

Registered with the R.C.S. LILLE METROPOLE under the number 969 201 532 00286

Head office : 243-245 Rue Jean JAURES à Villeneuve d'Ascq (59650)

TVA intracommunautaire : FR23969201532

Tel : +33 3 62 53 89 00

Email : dpo@nhood.com

2. DATA PROTECTION OFFICER (DPD/DPO) OF CEETRUS

CEETRUS has appointed a Data Protection Officer (DPO), whose duties include the following. (*Data Protection Officer*), whose tasks include the following.

You can contact the CEETRUS DPO by writing to the following addresses

- By post: CEETRUS - Data Protection Officer - 243-245 Rue Jean JAURES in Villeneuve d'Ascq (59650);
- By email: dpo@nhood.com

The CEETRUS DPO is the designated contact person for any request relating to the processing of personal data carried out by CEETRUS, and in particular the data collected via the Site. In this respect, the CEETRUS DPO may be contacted for requests relating to the processing of reservation data and for the processing of data collected through cookies and other tracers.

3. POINTS OF COLLECTION OF YOUR DATA, BASIS AND PURPOSES OF PROCESSING

In the context of this privacy policy, CEETRUS, as data controller, undertakes to limit the points of collection of your data to what is strictly necessary, and these points of collection are therefore limited to what is described below.

In any case, each collection point contains complete information (hereinafter the "**CNIL Block**") concerning your rights and informing you of the processing of the said data.

Our website collects personal data in three ways:

- With regard to data processing carried out following the completion of contact forms:

This refers to the contact forms made available to you on our Site. These forms are put on line by CEETRUS in order to simplify the exchanges that may take place between the Site editor

and the Persons Concerned. In order to provide a personalised response to your questions, CEETRUS is obliged to collect a certain amount of your personal data.

This data is therefore collected on the legal basis of legitimate interest. Indeed, in order to send a response to requests sent via these forms, CEETRUS collects contact data. This data is collected solely for the purpose of responding. The objective is to provide you with an adapted, personalised and most complete response possible.

- To the processing of personal data collected through cookies and other tracers:

In order to make the best use of the Site, you must accept the deposit of several cookies and other tracers (hereinafter referred to globally as "**Cookies**"). This document will attempt to answer any questions you may have regarding our collection of personal data via Cookies.

In accordance with the recommendations of the CNIL, certain Cookies are deposited without the need for consent. These cookies do not collect personal data, but are strictly necessary for the operation of the site. Similarly, certain statistical analysis cookies may be deposited without consent if they meet the criteria set by the CNIL.

In any case, the other Cookies are necessary for the optimal functioning of the Service. In particular, they allow us to carry out analyses on the efficiency of the Site, its scheduling and to offer you a qualitative service adapted to your needs.

The collection of personal data via the deposit of cookies is therefore based on your consent. No cookie allowing the collection of personal data is deposited before you have accepted the dedicated banner. These cookies are expressly identified in the banner that appears when you first connect to the Site.

In the particular case of third-party cookies deposited via the visit to our Site, CEETRUS may transfer the personal data collected to commercial partners or third parties only if you have consented to this.

As far as the deposit of statistical analysis cookies is concerned, they are deposited on the basis of legitimate interest since they allow CEETRUS to improve the quality of its service.

- Via your requests concerning the management of your personal data processed by CEETRUS:

You can contact us by post or by e-mail:

- By post to the following address: 18 rue Denis Papin - Bâtiment B2 CS 30638 - 59656 Villeneuve d'Ascq, France
- By phone: +33 3 62 53 89 00
- Via emails that you can send to the address: dpo@nhood.com ;

When you contact us through these channels, your interlocutors may ask you to provide a certain amount of personal data about you in order to process your requests or complaints. Telephone conversations may be recorded to ensure a satisfactory quality of service and for evidential purposes. You may object to this recording at any time. Requests made may be

subject to a request for confirmation of identity. In this case, you will be asked to provide a copy of a proof of identity. CEETRUS undertakes to delete this copy of proof of identity as soon as the answer to your request is provided.

In any event, the collection and processing of this data is not intended to be used for any purpose other than to fulfil your requests. This data is therefore collected on **the basis of legitimate interest since it is used to respond to your requests, but also on the basis of consent since you provide it voluntarily.**

Finally, CEETRUS specifies that this data will only be used to respond to your request.

4. PURPOSES OF PROCESSING YOUR DATA

Data are collected on the basis of several different purposes depending on the processing envisaged:

- For processing relating to contact forms, the purpose is to use your data to send you a reply tailored to your request
- For the processing of data collected via cookies, the purpose of the processing is to improve the website, to improve the visitor's experience and to offer content adapted to your preferences
- Finally, for processing operations relating to requests for the exercise of personal data rights, the purpose is to process the request in question

5. TRANSMISSION OF YOUR DATA

Your personal data may be passed on to other recipients, who process your data on their behalf, or to our subcontractors, who process only on our behalf and according to CEETRUS' instructions.

The recipients are :

- Our commercial partners, in which case the personal data collection points will inform you of any transfers made with the data entered on the said form. **CEETRUS undertakes never to transfer data to third parties or commercial partners for so-called "marketing" processing without having first obtained your consent.**
- Our technical service providers and subcontractors, who ensure the operation of the Site. These include hosts, developers, etc...
- Police or judicial authorities in the context of requisitions, particularly in the fight against fraud

Finally, CEETRUS applies a strict policy regarding the accessibility of data collected via its Services, and in particular via the Site.

6. YOUR RIGHTS TO YOUR DATA

You have the right to exercise your rights of access, rectification, opposition and deletion to the processing of your data in accordance with articles 38 to 40 of the law of 6 January 1978.

In application of the GDPR, you also have the possibility to exercise your rights to the limitation of processing, to erasure and portability of your data. This Regulation also imposes a reinforced information obligation on the data controller. In this respect, for any request for information concerning the processing of your data, you should contact the DPO at the address below.

In addition, you may formulate directives relating to the conservation, deletion and communication of your personal data after your death in accordance with Article 40-1 of Law 78-17 of 6 January 1978. These directives may be general or specific.

These rights can be exercised with CEETRUS who collected the personal data in the following way:

- By post, by writing to us at the following address

243-245 Rue Jean JAURES in Villeneuve d'Ascq (59650) - indicating your name, first name, address, email and if possible customer reference/number in order to speed up the processing of your request.

- To the DPO by sending your request to
 - By post: CEETRUS - Data Protection Officer - 243-245 Rue Jean JAURES in Villeneuve d'Ascq (59650) ;
 - By email: dpo@nhood.com

CEETRUS will reply to the person concerned as soon as possible.

If you do not receive a satisfactory response, you may refer the matter to the CNIL at any time.

7. RETENTION OF YOUR DATA

In accordance with Article 5e of Regulation 2016/679 of 27 April 2016, personal data shall only be kept in an identifiable form for no longer than is necessary for the purposes for which they are collected and processed.

In this respect, personal data is kept by CEETRUS according to precise rules that respect the rights and freedoms of individuals.

The retention period for personal data differs depending on the purpose.

Personal data collected via contact forms as well as personal data collected through requests to exercise a right will only be kept for the time necessary to send a reply. Personal data

collected via marketing cookies will never be kept beyond a period of 3 years from the date of collection.

For these three types of processing, the retention periods run from the time of collection.

8. SECURING YOUR DATA

As the data controller, CEETRUS takes all necessary precautions to preserve the security and confidentiality of the data and, in particular, to prevent them from being distorted, damaged or accessed by unauthorised third parties.

In accordance with article 35 of law 78-17 of 6 January 1978, CEETRUS' subcontractors undertake to respect the security and confidentiality of data.

In accordance with Article 32 of Regulation 2016/679 of 27 April 2016, CEETRUS undertakes to respect the security and confidentiality of data.

To this end, CEETRUS has defined a strict personal data security policy. If you wish to obtain more details about the security measures implemented by CEETRUS, please contact us at the address indicated in this document.