

PERSONAL DATA PROTECTION CHARTER

Miles Attack (located at 82 rue Henri Farman, TOUR SEQUANA - 92130 ISSY-LES-MOULINEAUX. FRANCE), a company from the Gekko Group (hereinafter « Miles Attack » or « Us ») has for activities (i) the provision of a loyalty programme for travel agents and (ii) the promotion of destinations offered by tourism service providers. In this context, Miles Attack is led to collect and use personal data relating to travel agents who are members of the loyalty programme (hereinafter the « Members »), to its contacts working within tourism service providers and tourist offices (hereinafter the « Partners »), but also to contacts working at service providers and suppliers with whom Miles Attack works (hereinafter the « Representatives »), as well as to applicants for a job in the company (hereinafter the « Applicants »), (together hereinafter « you »). Miles Attack acts to this end as data controller.

We know that privacy and data protection are part of your legitimate concerns.

This is the reason why we have established and implemented the present data protection charter (hereinafter the « Charter ») which describes the way your data may be used.

In order to give you the clearest and most transparent information possible, the Charter has been drafted to inform you about Miles Attack practices but also to provide you with a specific and tailored information, depending on whether you are :

- A Member of Miles Attack ;
- A Partner of Miles Attack ;
- A Representative of a service provider or a supplier ;
- Applicant for job at Miles Attack.

You should read the Charter carefully in order to be informed about the nature of the data Miles Attack holds on you and on how it uses them.

In order to help you understand the present Charter, we have drafted a Glossary at the end of this document.

For more clarity, you will find below the summary of the Charter.

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SUMMARY

SUMMARY	2
I. GENERAL PRINCIPLES APPLICABLE TO ALL OUR DATA PROCESSING	3
1) WHEN DOES THE CHARTER APPLY ?	4
2) WHAT ARE OUR COMMITMENTS ?	4
3) WHAT ARE THE SPECIFIC CATEGORIES OF PERSONAL DATA COLLECTED ?	4
4) WHAT IS BEING DONE TO ENSURE DATA SECURITY ?	5
5) ARE YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION ?	5
6) HOW TO EXERCISE YOUR RIGHTS ON THE DATA ?	5
II. SPECIFIC RULES APPLICABLE TO YOU	7
7) IF YOU ARE A MEMBER OF MILES ATTACK	8
8) IF YOU ARE A PARTNER OF MILES ATTACK	10
9) IF YOU ARE A REPRESENTATIVE OF A SUPPLIER OR SERVICE PROVIDER WITH WHOM MILES ATTACK WORKS	11
10) IF YOU ARE AN APPLICANT FOR A POSITION AT MILES ATTACK	13
GLOSSARY	14

**I. GENERAL PRINCIPLES APPLICABLE TO ALL
OUR DATA PROCESSING**

1) WHEN DOES THE CHARTER APPLY ?

The Charter applies to Applicants, to Representatives of service providers and suppliers, to agencies as well as its agents adhering to the Miles Attack programme but also to tourism service providers.

The Charter is subject to change or modification.

As a consequence, we invite you to regularly consult it on our website [<https://www.milesattack.com/fr/fr/login#>].

2) WHAT ARE OUR COMMITMENTS ?

Each of the Miles Attack entities processes all of your data according to the terms of this Charter and in accordance with the applicable law.

In particular, Miles Attack is fully committed to ensure that the data are :

- Processed in a **fair, lawful and transparent** way,
- Used **in accordance with the purposes** for which they were collected,
- Kept in a way that ensures there **security and confidentiality**,
- **Updated as regularly as possible**.

Miles Attack retains your data for no longer than necessary for the purposes for which they are processed. To this end, we have also drafted a data retention policy, that you can request by sending an email to the address indicated under article 6 below.

We may also need to archive your data for a longer time period in order to allow us to establish the proof of a right or contract, or to ensure our compliance with an obligation (legal, accounting, etc.). Archiving is conducted safely and with restricted access, in accordance with the applicable rules and for a period of time that complies with legal requirements.

Miles Attack will ensure that your rights are respected, in accordance with article 6 below.

3) WHAT ARE THE SPECIFIC CATEGORIES OF PERSONAL DATA COLLECTED ?

Miles Attack does not collect, use, store or process « sensitive » personal data, such as the ones revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and genetic data, biometric data used for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation about you.

4) WHAT IS BEING DONE TO ENSURE DATA SECURITY ?

Miles Attack takes suitable technical and organizational measures in accordance with applicable legal provisions to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, or unauthorized disclosure or access. To this end, technical measures (e.g. antivirus, daily backups, VPN) and organizational measures (including a login/password system, physical protection means) are implemented.

5) ARE YOUR DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION ?

Our data processing are mainly conducted in Europe.

In the event we transfer your personal data to a third country outside the European Union whose level of protection would not be considered as adequate by the European authorities, we undertake to ensure that the transfer in question is subject to appropriate guarantees in accordance with the applicable legislation.

For example, we will ensure that companies importing your data sign data processing agreement based on standard contractual clauses validated by the European Commission or that they have adhered to a code of conduct or to a certification scheme.

You can ask for more information about the safeguards implemented by sending an email at the address indicated under article 6 below.

6) HOW TO EXERCISE YOUR RIGHTS ON THE DATA ?

You have the rights to obtain information and to have access to your personal data that are collected by Miles Attack, unless otherwise provided by applicable law.

You have also the right to request the rectification of your data, their erasure or to limit their processing. Also, you have the right to your data portability and the right to define instructions for data processing after your death (« post-mortem » instructions). You may also object to the processing of your data. These rights can only be exercised insofar as they do not prevent the proper execution of the contract between you and Miles Attack. You can exercise your rights by contacting the data protection referent of Miles Attack at the following address: rgpd@gekko-holding.com

In order to ensure the confidentiality and the protection of your personal data, we will need to identify you in order to answer to your request. To that extent, in case of reasonable doubts about your identity, you may be asked to attach a copy of an official identify document such as an identity card or passport, in support of your request. In this case, a black and white front copy of one of these documents is sufficient. All requests will be processed as soon as possible and in accordance with the applicable law.



You can also lodge a complaint with a supervisory authority (list of supervisory authorities in the http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm) and you can contact the GDPR referent of Miles Attack at the email address rgpd@gekko-holding.com.

II. SPECIFIC RULES APPLICABLE TO YOU

7) IF YOU ARE A MEMBER OF MILES ATTACK

When an agency joins the loyalty programme, the members' personal data is collected through a registration or a contact form (available at www.milesattack.com).

We process your personal data according to the following characteristics :

Collected data	The purposes of the processing of your data	The legal grounds of the processing of your data	The data recipients	The data retention period in the active base	The data retention period in the archive base
<ul style="list-style-type: none"> ● The data of the agent : <ul style="list-style-type: none"> ○ Your name and surname ; ○ Personal email address ; ○ Cell phone number ; ○ Birth date ; ○ Country ; ○ Personal address. 	<ul style="list-style-type: none"> ● Joining the programme ; ● Execution and management of the member's order; ● Management of the Miles Attack loyalty programme. 	<ul style="list-style-type: none"> ● Processing necessary for the performance of a contract to which the member is party. 	<p>Internal recipients:</p> <ul style="list-style-type: none"> ● Miles Attack internal service ; ● Transfer within the Gekko group where the IT infrastructure is installed . <p>External recipients :</p> <ul style="list-style-type: none"> ● Service providers (server hosting, Mastercard cards provider, online store, car rental) ; ● Local or foreign public authorities in the context of official requests ; ● External counsel ; ● Investors. 	<ul style="list-style-type: none"> ● Your data is retained for the duration of the contract between us when the legal basis is the execution of the contract. 	<ul style="list-style-type: none"> ● No archiving.
	<ul style="list-style-type: none"> ● Improvement of the service quality (customization of offers); ● Marketing communication. 	<ul style="list-style-type: none"> ● Processing based on the consent of the person concerned. 		<ul style="list-style-type: none"> ● Your data is retained for 3 years after your last contact with us. 	<ul style="list-style-type: none"> ● No archiving.
	<ul style="list-style-type: none"> ● Litigation management ; ● Management of users' requests. 	<ul style="list-style-type: none"> ● Processing necessary for the purposes of the legitimate interest pursued by Miles Attack for the protection of its rights and interests. 		<ul style="list-style-type: none"> ● Your data is retained for 3 years after your last contact with us. 	<ul style="list-style-type: none"> ● Statutory limitation period.

Collected data	The purposes of the processing of your data	The legal grounds of the processing of your data	The data recipients	The data retention period in the active base	The data retention period in the archive base
	<ul style="list-style-type: none"> Realization of sales statistics and reports. 	<ul style="list-style-type: none"> Processing is necessary for the purposes of the legitimate interests pursued by Miles Attack 		<ul style="list-style-type: none"> Your data is retained for 3 years after your last contact with us. 	<ul style="list-style-type: none"> No archiving
	<ul style="list-style-type: none"> Improvement of the quality of the service (fight against fraud) 	<ul style="list-style-type: none"> Processing is necessary for compliance with a legal obligation. 		<ul style="list-style-type: none"> Your data is kept for the time necessary to deal with fraud 	<ul style="list-style-type: none"> Statutory limitation period .

8) IF YOU ARE A PARTNER OF MILES ATTACK

When a tourism provider contacts us, the personal data of Partners are collected through a contact form of Miles Attack.
We process your personal data according to the following characteristics :

Data collected	The purposes of the processing of your data	The legal grounds of the processing of your data	Data recipients	The data retention period in the active base	The data retention period in the archive base
<ul style="list-style-type: none"> • Data of the partner's Representative : <ul style="list-style-type: none"> o Your name and surname ; o Professional email ; o Job title ; o Professional phone number 	<ul style="list-style-type: none"> • Partners management. 	<ul style="list-style-type: none"> • Processing necessary for the performance of a contract to which the Partner is party. 	<p><u>Internal recipients:</u></p> <ul style="list-style-type: none"> • Miles Attack internal service ; • Transfer within the Gekko group where the IT infrastructure is installed. 	<ul style="list-style-type: none"> • Your data is kept for the duration of the contract that binds us. 	<ul style="list-style-type: none"> • No archiving.
	<ul style="list-style-type: none"> • Litigation management ; • Management of user requests. 	<ul style="list-style-type: none"> • Processing is necessary for the purposes of the legitimate interests pursued by Miles Attack. 	<p><u>External recipients :</u></p> <ul style="list-style-type: none"> • Customer Relationship Management software provider (servers hosted in Frankfurt) 	<ul style="list-style-type: none"> • Your data is retained for 3 years after your last contact with us. 	<ul style="list-style-type: none"> • Statutory limitation period.

9) IF YOU ARE A REPRESENTATIVE OF A SUPPLIER OR SERVICE PROVIDER WITH WHOM MILES ATTACK WORKS

If you are the legal representative or the employee of a company with whom we collaborate, whether that company is one of our suppliers or service providers, we may collect information about you as part of this collaboration.

We process your personal data according to the following characteristics :

Data collected	The purposes of the processing of your data	The legal grounds the processing of your data	Data recipients	The data retention period in the active base	The data retention period in the archive base
<ul style="list-style-type: none"> Your name and surname ; Your professional email adress ; Your professional phone number ; Your job title ; The company that employs you. 	<ul style="list-style-type: none"> Ensuring the management of our contractual relations. 	<ul style="list-style-type: none"> Processing necessary for the performance of the contract that binds us to the company that your represent. 	<p>Internal recipients :</p> <ul style="list-style-type: none"> Miles Attack internal service ; Accounting department. <p>External recipients :</p> <ul style="list-style-type: none"> Customer Relationship Management software provider (servers hosted in Frankfurt). 	<ul style="list-style-type: none"> Your data are kept for 3 years as from the end of the contractual relationship between us and the company you represent, or as from our last contact with you ; In the event that you leave this company before the end of our contractual relationship, we will delete your data as soon as we are informed of your departure. 	<ul style="list-style-type: none"> Statutory limitation period, e.g. 5 years for commercial matters or 10 years for accounting documents.
	<ul style="list-style-type: none"> Maintenance of supplier and service provider files ; Selection of our providers and suppliers. 	<ul style="list-style-type: none"> Processing is necessary for the purposes of Miles Attack's legitimate interests in selecting its service providers and suppliers. 			
	<ul style="list-style-type: none"> Management of non-payment and litigation. 	<ul style="list-style-type: none"> Processing is necessary for the purposes of Miles Attack's legitimate interests in recovering the sums that are due to it and defending its interests. 			

Data collected	The purposes of the processing of your data	The legal grounds the processing of your data	Data recipients	The data retention period in the active base	The data retention period in the archive base
	<ul style="list-style-type: none"> • Sending newsletters and organizing public relations events ; • Realization of commercial prospecting operations. 	<ul style="list-style-type: none"> • Processing is necessary for the purposes of Miles Attack's legitimate interests in organizing and carrying out marketing operations. 			

10) IF YOU ARE AN APPLICANT FOR A POSITION AT MILES ATTACK

When you apply for one of our job offer or when you submit a spontaneous application by sending us your CV, we examine it to determine whether your profil corresponds to our needs.

We process your personal data according to the following characteristics :

Data collected	The purposes of the processing of your data	The legal grounds of the processing of your data	Data recipients	The data retention period in the active base	The data retention period in the archive base
<ul style="list-style-type: none"> The information on your CV. 	<ul style="list-style-type: none"> Analysis of your application to determine if it corresponds to the position to be filled ; Contact to arrange a meeting. 	<ul style="list-style-type: none"> Processing is necessary for the purposes of Miles Attack's legitimate interests in recruiting staff corresponding to its needs. 	<p>Internal recipients :</p> <ul style="list-style-type: none"> Human Resources department ; The person in charge of the services concerned by the recruitment. <p>External recipients :</p> <ul style="list-style-type: none"> None. 	<ul style="list-style-type: none"> Your data is kept for the duration of the recruitment process ; Your CV is kept for 2 years from your last contact with us ; If we wish to keep your CV for more than 2 years, we will ask for your prior consent. 	<ul style="list-style-type: none"> No archiving.
	<ul style="list-style-type: none"> Litigation management; Management of requests from users or web users. 	<ul style="list-style-type: none"> Processing is necessary for the purposes of the legitimate interests pursued by Miles Attack. 			

GLOSSARY

- « **Personal data** » means any information that identify you directly or indirectly. This may include your name, first name, image or voice, or your social security number.
- « **Purpose** » means the main purpose of the use of your personal data. In other words, this is the reason why we process your data.
- « **Processing** » means any operation or set of operations which is performed on personal data, whatever the process used (collection, recording, organization, conservation, adaptation, modification, extraction, consultation, use, communication by transmission or diffusion or any other form of disclosure, combination). For example, the management of the staff or the recording of calls in the call center are treatments.
- « **Controller** » means the natural or legal person which determines the purposes and means of the processing of personal data, i.e. all operations carried out on them (such as collection, consultation, storage, etc.). In other words, it is the person who decides why and how to process your personal data.
- « **Processor** » means the natural or legal person (company or a public authority) which processes personal data on behalf of the controller, in the context of a service or provision of a service. The relations with our processors are governed by subcontracting agreements, in accordance with the applicable legal requirements.