

In the context of the entry into force of the General Data Protection Regulation (GDR) in Europe on 25 May 2018, we are making changes to our personal data protection policy.

This Privacy Policy describes how we collect, use, process and disclose information about you, including personal information, in connection with your access to and use of the ESCAPADE FRANÇAISE Platform.

If you encounter a term that is not defined in this Privacy Policy (such as "Announcement" or "ESCAPADE FRANÇAISE Platform"), that term will have the same definition as in our Terms of Service.

1. COLLECTED DATA

We collect three general categories of information.

1.1 Information you provide us.

1.1.1 Information needed to use the ESCAPADE FRANÇAISE Platform.

We request and collect the following personal information about you when you use the ESCAPADE FRANÇAISE Platform. This information is necessary for the proper performance of the agreement between you and us and to enable us to meet our legal obligations. Without them, we may not be able to provide you with all the services you request.

- **Account information.** When creating your ESCAPADE FRANÇAISE Account, we ask you to provide us with certain information such as your first name, last name, e-mail address and date of birth.
- **Profile information.** In order to use certain features of the ESCAPADE FRANÇAISE Platform (such as booking), we may ask you to provide additional information that may include your address, telephone number and profile picture.
- **Payment information.** To use certain features of the ESCAPADE FRANÇAISE Platform (such as booking), we may ask you to provide certain financial information (such as your bank account or credit card information) in order to facilitate payment processing.

1.1.2 Information you choose to give us.

You may choose to provide us with additional personal information, in order to obtain a better user experience when you use the ESCAPADE FRANÇAISE Platform. This additional information will be processed as soon as you have given your consent.

- **Additional profile information.** You may choose to provide additional information as part of your FRENCH ESCAPADE profile (such as gender, preferred language(s), city and personal description). Some of this information, as specified in your Account settings, is part of your public profile page and will be visible to others.
- **Other information.** Alternatively, you may choose to provide us with information when you complete a form, conduct a search, update or add information to your ESCAPADE FRANÇAISE Account, complete surveys, post to discussion forums, participate in promotional activities or use other features of the ESCAPADE FRANÇAISE Platform.

1.1.3 Information required to use the Payment Services.

The Payment Processor must collect the following information, as it is necessary for the proper execution of the agreement between you and us and to comply with applicable law (such as anti-money laundering regulations). Without them, you will not be able to use the Payment Services:

- **Payment information.** When you use Payment Services, the Payment Processor requires certain financial information (such as your bank account or credit card information) in order to process payments and comply with applicable law.
- **Identity verification and other information.** If you are a Host, the Payment Processor may require identity verification information (such as copies of your official identification document, passport, national identity card or driver's license) or other authentication information, such as your date of birth, address, e-mail address, telephone number and other information, in order to verify your identity, offer Payment Services and comply with applicable law.

1.2 Information we automatically collect when you use the ESCAPADE FRANÇAISE Platform.

When you use the ESCAPADE FRANÇAISE Platform and Payment Services, we automatically collect information, including personal information, about the services you use and how you use them. This information is necessary for the proper execution of the agreement between you and us, for us to comply with legal obligations and taking into account our legitimate interest in being able to provide and improve the functionality of the FRENCH ESCAPADE Platform and Payment Services.

- **Geolocation information.** When you use certain features of the ESCAPADE FRANÇAISE Platform, we may collect information about your approximate or precise location, as determined by data such as your IP address or the GPS of your mobile device, in order to provide you with a better user experience. Most mobile devices allow you to control or disable the use of location services in applications from the device settings menu. ESCAPADE FRANÇAISE may also collect this information, even if you are not using the application, if this connection is enabled in the settings or permissions of your device.
- **Use information.** We collect information about your interactions with the ESCAPADE FRANÇAISE Platform, such as your visits to pages or content, your searches for Advertisements, reservations you have made and other actions on the ESCAPADE FRANÇAISE Platform.
- **Connection and device data.** We automatically collect login and device data when you access and use the ESCAPADE FRANÇAISE Platform, even if you have not created a FRENCH ESCAPADE Account or are not logged in. This information includes, but is not limited to: information about how you used the ESCAPADE FRANÇAISE Platform (including if you clicked on links to third-party applications), IP address, access dates and times, computer hardware and software data, device data, data associated with device use, unique identifiers, crash data, cookies and pages that you viewed or displayed before or after using our Platform.
- **Cookies and similar technologies.** We use cookies or other similar technologies, such as web beacons, pixels and mobile device identifiers. We may also authorize our business partners to use these tracking technologies on the ESCAPADE FRANÇAISE Platform or subscribe to the services of third parties to track your behavior on our behalf. Even if you have the possibility to disable cookies from your browser settings, the ESCAPADE FRANÇAISE Platform does not modify its practices in response to a "Do not follow" signal in the HTTP header of your browser or mobile application, because of a lack of standardization regarding how this signal should be interpreted.
- **Information on payment transactions.** ESCAPADE FRANÇAISE collects information about your payment transactions on the ESCAPADE FRANÇAISE Platform, including the payment method used, date and time, payment amount, payment method expiration date, billing postal code, PayPal e-mail address, IBAN information, your address and other related transaction information. This information is necessary for the proper execution of the agreement between you and us and to enable us to make available the Payment Services.

2. USE OF THE INFORMATION WE COLLECT

We use, store and process information, including personal information about you, to fuel, understand, improve and develop the ESCAPADE FRANÇAISE Platform, to create and maintain a more secure trust environment, and to comply with our legal obligations.

2.1 To feed, improve and develop the ESCAPADE FRANÇAISE Platform.

- To allow you to access and use the ESCAPADE FRANÇAISE Platform.
- Manage, protect, improve and optimize the Platform and the ESCAPADE FRANÇAISE experience, for example by carrying out analyses and studies.
- Provide customer service.
- Send you support and service messages, updates, security alerts and Account notifications.
- If you provide us with your contact details, we may process this information: (i) for fraud detection and prevention actions and (ii) for any purposes authorized by you at the time of data collection.
- To manage, protect, enhance and optimize the ESCAPADE FRANÇAISE Platform and experience, as well as to customize and adapt your experience (e.g. by making Ad suggestions or ranking search results), we profile based on your interactions with the ESCAPADE FRANÇAISE Platform, your search and booking history, your profile and preference information, and other content you transmit to the ESCAPADE FRANÇAISE Platform.

We process this information given our legitimate interest in improving the ESCAPADE FRANÇAISE Platform and our Members' experience with it, and when such information is necessary for the proper execution of the agreement with you.

2.2 Create and maintain a more secure environment of trust.

- Detect and prevent fraud, spam, abuse, security incidents and other harmful activities.
- Conduct safety investigations and risk assessments.
- Verify or authenticate the information or identifications transmitted by you (for example, verify the address of your Hosting or compare the identification photo with another photo transmitted by you).
- Perform checks with databases or other sources of information, including police or background checks, to the extent permitted by applicable law and with your consent, if applicable.
- Comply with our legal obligations.
- Resolve any disputes we may have with our Members and enforce our contracts with third parties.
- Enforce our Terms of Service and other policies.
- In connection with the above activities, we may profile your interactions with the ESCAPADE FRANÇAISE Platform, your profile information and other content that you transmit to the ESCAPADE FRANÇAISE Platform, as well as information obtained from third parties. In limited cases, automated processes may restrict or suspend access to the FRENCH ESCAPADE Platform if such processes detect a Member or activity that, in our opinion, represents a security risk or other type of risk to the FRENCH ESCAPADE Platform, other Members or third parties.

We process this information in view of our legitimate interest in protecting the ESCAPADE FRANÇAISE Platform, to measure the proper execution of our agreement with you and to comply with applicable laws.

2.3 Provide, Customize, Evaluate and Improve our Advertising and Marketing Services.

- Send you promotional messages, commercial, advertising and other information that may be of interest to you based on your preferences (including information about ESCAPADE FRANÇAISE

or about our partners' campaigns and services) and social network advertisements via social networking platforms, such as Facebook or Google.

- Personalize, evaluate and improve our advertising.
- Manage sponsorship programs, awards, surveys, lotteries, contests, or other promotional activities or events supported or managed by ESCAPADE FRANÇAISE or its commercial partners.
- Profile your features and preferences (based on the information you provide us, your interactions with the ESCAPADE FRANÇAISE Platform, information obtained from third parties, and your search and booking history) to send you promotional messages, commercial, advertising and other information that we believe may be of interest to you.

We will process your personal information for the purposes listed in this section, given our legitimate interest in undertaking marketing activities to offer you products or services that may be of interest to you. You can choose to no longer receive marketing communications from us by following the unsubscribe instructions included in our marketing communications or by changing your notification settings on your ESCAPADE FRANÇAISE Account.

2.4 Use by the Payment Processing Manager of the information collected.

- Enable you to access and use the Payment Services.
- Detect and prevent fraud, abuse, security incidents and other harmful activities.
- Conduct safety investigations and risk assessments.
- Perform controls over databases and other sources of information.
- Comply with legal obligations (such as anti-money laundering regulations).
- Apply Terms of Payment and other payment policies.
- With your consent, send you promotional messages, commercial, advertising and other information that may be of interest to you, based on your preferences.

The Payment Processor manages this information, given its legitimate interest in improving the Payment Services and its users' experience with these services, if such information is necessary for the proper execution of the agreement with you and to comply with applicable laws.

3. SHARING AND DISCLOSURE

3.1 With your consent.

Where you have given your consent, we may share information about you, including personal information, as described at the time of your consent, such as when you authorize a third party application or website to access your ESCAPADE FRANÇAISE Account or when you participate in promotional activities conducted by ESCAPADE FRANÇAISE partners or third parties.

3.2 Sharing among Members.

In order to facilitate bookings, or other interactions between Members, we may need to share certain information, including personal information, with other Members, when necessary for the proper performance of the agreement between you and us, as follows:

- When you send a reservation request as a Traveler, certain information about you is shared with the Host, including your full name, the full name of any additional Travelers, your cancellation history and any other information you agree to share. Once your reservation is confirmed, we will disclose additional information, such as your phone number, to help coordinate the trip.
- When you have confirmed a reservation as a Host, certain information is shared with the Traveler to finalize the reservation, such as your full name, telephone number and the address of your Accommodation or Experience.

- When you, as a Traveler, invite other Travelers to a reservation, your full name, travel dates, Host name, Announcement details, accommodation address and other associated information will be shared with each additional Traveler.

Nous ne communiquons pas vos données de facturation ou de paiement à d'autres Membres.

3.3 Social networking platforms.

Where possible under applicable law, we may use certain limited personal information about you, such as your email address, to "hash" it and share it with social networking platforms, such as Facebook or Google, to generate potential customers, drive traffic to our websites or otherwise promote our products and services on the ESCAPADE FRANÇAISE Platform. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of interest to you.

The social networking platforms with which we may share your personal data are neither controlled nor monitored by ESCAPADE FRANÇAISE. Therefore, any questions regarding how your social networking platform service provider processes your personal data should be directed to that provider.

Please note that you may at any time request ESCAPADE FRANÇAISE to stop processing your data for these direct marketing purposes by sending an e-mail to donneesrgpdef@escapadefrancaise.com

4. OTHER IMPORTANT INFORMATION

4.1 Google Maps/Earth.

Some parts of the ESCAPADE FRANÇAISE platform use Google Maps/Google Earth mapping services, including Google Maps APIs.

5. THIRD-PARTY PARTNERS AND INTEGRATIONS

The ESCAPADE FRANÇAISE Platform may contain links to third party services or websites, such as third party integrations, brand sharing services, or third party brand services ("Third Party Partners"). ESCAPADE FRANÇAISE does not own or control these Third Party Partners and in your interactions with them, you may either provide information directly to the Third Party Partner, or to ESCAPADE FRANÇAISE or both. Such Third Party Partners will have their own rules regarding the collection, use and disclosure of information. We encourage you to read the privacy policies of other websites you visit.

6. YOUR RIGHTS

You may exercise any of the rights described in this section by contacting your ESCAPADE FRANÇAISE Data Processing Manager and your ESCAPADE FRANÇAISE Payment Processing Manager designated as competent by this Privacy Policy, by sending an e-mail to donneesrgpdef@escapadefrancaise.com. Please note that we may ask you to verify your identity before taking any further action regarding your application.

6.1 Managing your information.

You can access and update some of your information in your Account settings. If you have chosen to connect your ESCAPADE FRANÇAISE Account to a third party application, such as Facebook or Google, you can change your settings and withdraw permission for the application by changing your Account settings. You are responsible for keeping your personal information up-to-date.

6.2 Correction of inaccurate or incomplete information.

You have the right to ask us to correct inaccurate or incomplete personal information about you (that you cannot update yourself on your ESCAPADE FRANÇAISE Account).

6.3 Data Access and Portability.

In some jurisdictions, applicable law may allow you to request copies of your personal information that we hold. You may also be entitled to request copies of the personal information you have provided to us in a structured, commonly used and machine-readable format and/or request us to transmit such information to another service provider (where technically possible).

6.4 Retention and deletion of data.

In general, we retain your personal information as long as necessary to fulfill the agreement between you and us and to comply with our legal obligations. If you no longer wish us to use your information to provide you with the services of the ESCAPADE FRANÇAISE Platform, you may request that we delete your personal information and close your ESCAPADE FRANÇAISE Account. Please note that if you request that your personal information be deleted:

- We may retain some of your personal information necessary for our legitimate business interests, such as detecting and preventing fraud and improving security. For example, if we suspend a FRENCH ESCAPADE Account for fraud or security reasons, we may retain certain information from that FRENCH ESCAPADE Account to prevent that Member from opening a new FRENCH ESCAPADE Account in the future.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. For example, ESCAPADE FRANÇAISE may retain some of your information for tax, legal and audit purposes.
- Because we maintain the ESCAPADE FRANÇAISE Platform to protect it from accidental or malicious loss or destruction, residual copies of your personal information may not be deleted from our backup systems for a limited period of time.

6.5 Withdrawal of consent and limitation of treatment.

If you have given your consent to the processing of your personal information by ESCAPADE FRANÇAISE, you may withdraw your consent at any time by changing your Account settings or by sending a communication to ESCAPADE FRANÇAISE specifying the consent you withdraw. Please note that the withdrawal of your consent does not affect the legality of any processing activity based on such consent prior to its withdrawal. In addition, in some jurisdictions, applicable law may give you the right to limit how we use your personal information, particularly in cases where (i) you dispute the accuracy of your personal information; (ii) the processing is unlawful and you object to the deletion of your personal information; (iii) we no longer need your personal information for processing purposes, but you require the information for the purposes of making, exercising or defending legal claims; or (iv) you have objected to the processing under Section 6.6 and pending analysis as to whether the legitimate interests of ESCAPADE FRANÇAISE take precedence over yours.

6.6 Objection to treatment.

In some jurisdictions, applicable law may allow you to request ESCAPADE FRANÇAISE not to use your personal information for certain specific purposes (including profiling) if such processing is based on a legitimate interest. If you object to this processing, ESCAPADE FRANÇAISE will no longer process your personal information for these purposes, unless we can demonstrate serious and legitimate reasons for such processing or such processing is necessary for the establishment, exercise or defense of legal claims.

If your personal information is processed for direct marketing purposes, you may at any time request ESCAPADE FRANÇAISE to stop processing your data for these direct marketing purposes by sending an e-mail to donneesrgpdef@escapadefrancaise.com.

6.7 Filing complaints.

You have the right to file complaints concerning the data processing activities carried out by ESCAPADE FRANÇAISE before the competent data protection authorities.

7. SECURITY

We implement and continuously update administrative, technical and physical security measures to protect your information against unauthorized access, loss, destruction or alteration. Some of the safeguards we use to protect your information are firewalls and data encryption, as well as information access controls. If you know or have reason to believe that your FRENCH ESCAPADE Account identification information has been lost, stolen, misappropriated or otherwise compromised, or in the event of actual or suspected unauthorized use of your FRENCH ESCAPADE Account, please contact us following the instructions in the "Contact Us" section below.

8. AMENDMENTS TO THIS PERSONAL DATA PROTECTION CHARTER

ESCAPADE FRANÇAISE reserves the right to make any modification to this Privacy Policy at any time, in accordance with this clause. If we make an amendment to this Privacy Policy, we will publish the new version on the ESCAPADE FRANÇAISE Platform and update the "Last Update" date at the top of this Privacy Policy. We will also notify you of the change by e-mail at least thirty (30) days prior to the effective date. If you do not agree with the terms of the new Privacy Policy, you may delete your Account. If you do not delete your Account before the effective date of the new Personal Data Protection Charter, your access and continued use of the ESCAPADE FRANÇAISE Platform will be subject to the new Personal Data Protection Charter.

9. CONTACT US

If you have any questions or complaints about this Privacy Policy or the information practices of ESCAPADE FRANÇAISE, you can send us an e-mail or contact us at: donneesrgpdef@escapadefrancaise.com.