

# THIRD PARTIES

## Privacy Policy

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## I. Definitions and scope

The terms used in this document (the "**Third Parties Privacy Policy**") such as "**Personal Data**" or "**Processing**" have the meaning given to them by the glossary in **Section VIII** of the Third Parties Privacy Policy or, failing that, by the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals in relation to the Processing of personal data and the free circulation of this data, hereafter "**GDPR**") or the applicable local data protection legislation, if any.

This Third Parties Privacy Policy applies to the Processing of the Personal Data of the following individuals:

- suppliers and partners' employees and representatives;
- agency workers;
- shareholders' representatives and members of the administrative, management and supervisory bodies;
- employees and representatives of companies with whom AccorInvest enters or may enter into a transaction or a business relationship; and
- visitors of AccorInvest' sites.

For the purposes of this document, these persons are generally referred to as "**Third Parties**" or "**Data subjects**".

For the avoidance of doubt, this Third Parties Privacy Policy does not apply to the Personal Data of customers or to those of AccorInvest's employees (for the latter please refer to the **Customer Privacy Policy** and the **Employee Privacy Policy**).

This Third Parties Privacy Policy covers all AccorInvest Entities' activities, from hotel operations to asset management and support activities.

This Third Parties Privacy Policy describes how we collect and use your Personal Data during and after your relationship with us, in accordance with the applicable data protection regulations.

We reserve the right to update this Third Parties Privacy Policy at any time. We may also inform the Third Parties in other ways from time to time about the Processing of their Personal Data.

## II. Data processing principles

AccorInvest is committed to complying with all the laws and regulations that govern the Processing of Personal Data. Accordingly, AccorInvest undertakes to apply the following principles:

- **Data collection for specific purposes - lawfulness of Processing**

Personal Data is collected and processed solely for the purposes and in the contexts described in **Section IV** of the Third Parties Privacy Policy.

Any Processing of Personal Data by AccorInvest will have a lawful basis (such as consent, the performance of a contract or legal obligation, or the pursuit of a legitimate interest) as required under the GDPR or any other applicable legislation.

- **Data minimisation and storage limitation**

AccorInvest will only collect Personal Data that is adequate, relevant and not excessive, having regard to the purposes for which it is processed as described in **Section IV**.

The Personal Data processed is kept only for the time required for the purposes described in **Section IV** and the rules that apply to the storage and archiving of data.

- **Data security**

AccorInvest protects Personal Data from destruction, loss, tampering, disclosure or unauthorised use.

Accordingly, technical and organisational measures such as the management of access rights and computer file security (e.g. passwords, encryption) are implemented to ensure the confidentiality, integrity and availability of the Personal Data.

### III. Personal Data collected

As Data Controller, AccorInvest collects and processes different categories of Personal Data.

#### **The Personal Data collected may be:**

- identity and identification data (e.g. surname, first name, gender, nationality, date and place of birth, photographs) and contact information (e.g. postal address, e-mail address and telephone number);
- information regarding your shareholding in AccorInvest's or in any other company's equity (number of shares and any notes/information to be linked to that shareholding);
- data from any communication between you and AccorInvest, including data in the minutes of meetings;
- economic and financial information (e.g. bank details, tax information);
- data on the use of AccorInvest's information system (e.g. IP address, login data);
- location data (e.g. travel information);
- data from CCTV and control of access to premises (e.g. security passes);
- data collected in connection with a whistleblowing system made available to AccorInvest's employees;
- In addition, the following Personal Data of the Agency Workers' and suppliers' and partners' employees may be collected in accordance with the applicable laws and regulations:
  - social and financial information (e.g. social security number, work permit, salary, disability information)
  - information about profession, training and career (e.g. employment contract, start date, identification number, positions held, working hours degrees, CV)
  - copy of the driving licence
  - any other information as required by the applicable regulations;
- any other Personal Data collected or provided by you in the course of the relationship.

AccorInvest may also process certain Special Categories of Personal Data such as information revealing racial or ethnic origin, religion beliefs, biometric data or health data and Personal Data relating to criminal convictions and offences.

Where Special Categories of Personal Data are processed, AccorInvest ensures that at least one of the following conditions is met:

- you have given your express consent
- Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of AccorInvest or yours in the field of employment, social security and social protection law
- the information is made public by you
- Processing is necessary to protect your vital interests
- Processing is justified by public interest
- Processing is necessary for the observation, exercise or defence of a legal claim, or
- Processing is necessary for preventive or occupational medicine, fitness for work assessment, medical diagnoses, healthcare or social welfare, or management of health care or social protection services systems.

Where Personal Data relating to criminal convictions and offences are processed, AccorInvest ensures that the processing is authorised by Union or Member State law providing for appropriate safeguards for the rights and freedoms of data subjects. These Personal Data may be collected from publicly accessible sources or from the legal representative of a company you are legally or contractually related to.

## IV. Purposes and legal basis

The processing of Personal Data is carried out for one or more specific and legitimate purposes.

The lawful Processing of Personal Data is necessary to achieve the following purposes:

Processing purposes	Legal basis for Processing
<p><b>Compliance with the applicable legislation and regulation.</b> For example:</p> <ul style="list-style-type: none"> <li>- the social regulations (notably for those related to fight against illegal employment)</li> <li>- managing whistleblowing systems and compliance and ethics issues</li> <li>- the tax and financial regulations</li> <li>- the anti-bribery and anti-money laundering regulations</li> </ul>	<p>Processing is necessary to comply with a legal obligation.</p>
<p><b>Management of administrative operations related to:</b></p> <ul style="list-style-type: none"> <li>- contracts</li> <li>- orders</li> <li>- invoices</li> <li>- payments</li> <li>- management of suppliers' account</li> <li>- financial statistics and annual revenue per suppliers</li> <li>- partners and suppliers' selection</li> <li>- creation and update of a suppliers and partners' information database</li> <li>- monitoring of suppliers and partners relationship</li> </ul>	<p>Processing is necessary for the performance of the contract to which the data subject is party.</p> <p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in the management of their suppliers and partners.</p> <p>Processing is necessary to comply with a legal obligation.</p>
<p><b>Responding to requests from the police or from judicial or administrative authorities</b> in the event of an inspection, audit or investigation according to the applicable law.</p>	<p>Processing is necessary to comply with a legal obligation.</p>

<p>Allowing AccorInvest Entities to <b>protect their rights</b> or <b>substantiate any claim</b>, defence or statement in a case or before the judicial and/or administrative authorities, an arbitration tribunal or a mediator, in connection with actions, disciplinary investigations or an internal or external audit or investigation.</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in protecting their rights and interests.</p>
<p>Checking <b>qualifications and other documents during the onboarding process of Agency Workers.</b></p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in organizing the integration of the Agency Worker.</p> <p>Processing is necessary to comply with a legal obligation.</p>
<p>Providing <b>services to Third Parties</b> (providing food or accommodation, lunch vouchers, access to a company or inter-company canteen etc.).</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in providing services to Third Parties.</p>
<p>Organising <b>social company events</b> (seminars, conventions, entertainments etc.)</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in organizing company events.</p>
<p>Allowing the data subject to <b>access and use</b> AccorInvest's <b>IT tools</b>.</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in allowing access and use to its IT tools to the Third Parties.</p>
<p>Ensuring <b>security</b> in particular in respect of:</p> <ul style="list-style-type: none"> <li>- access to premises (e.g. security passes and CCTV recordings)</li> <li>- access to and use of IT tools, in accordance with AccorInvest's IT Security Policy or specific rules adopted by each AccorInvest Entity.</li> </ul>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in ensuring the security of premises and infrastructure.</p> <p>Processing is necessary to comply with a legal obligation.</p>

<p><b>Day to day management of AccorInvest Entities</b> operations for purposes such as:</p> <ul style="list-style-type: none"> <li>- planning and budgeting</li> <li>- staff management;</li> <li>- managing Agency Workers' files</li> <li>- financial reporting</li> <li>- legal activities of the entities (ex. organization of the board and general meetings)</li> <li>- internal and external communication</li> <li>- activity reports that may include the personal data of certain categories of data subjects.</li> </ul>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities in pursuing their corporate objectives.</p> <p>Processing is necessary to comply with a legal obligation.</p>
<p>Organising internal or external <b>training</b>.</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by AccorInvest Entities.</p> <p>Processing is necessary to comply with a legal obligation.</p>

## V. Data retention

The Personal Data processed is retained by the AccorInvest Entity in accordance with the retention obligations stipulated by applicable legal and regulatory provisions. In the absence of such legal and regulatory provisions, the Personal Data may be retained for the period necessary for the purposes for which it was Processed.

We may further retain the Personal Data for legal purposes and to protect AccorInvest's rights and interests until the end of the retention period as prescribed by applicable laws.

After the retention period the Personal Data will either be destroyed or anonymised. The anonymisation of the Personal Data means that it can no longer be associated with the Third Parties.

## VI. Data recipients and transfers

AccorInvest may transfer Personal Data internally or externally to Recipients if this is necessary to achieve the purposes specified in **Section IV**.

The Personal Data is shared with AccorInvest's personnel authorized to receive it, and may also be transferred to external Recipients such as:

- suppliers - acting as a data processor - that need the Personal Data to provide services to AccorInvest (e.g. IT service providers, auditors, hotel managers);
- financial institutions and advisers requiring the data for legal or compliance purposes;
- government, competent authorities and judicial authorities, if required by law or in connection with a criminal investigation or proceedings and in accordance with local regulations;
- external advisers (such as lawyers) to assert its rights and defend itself in legal proceedings;
- third-party companies involved in transactions involving the Group's assets (e.g. assets purchasers, notary).

AccorInvest takes appropriate steps to ensure that Personal Data is protected when sharing it with staff or third-party Recipients. In all cases, the transferred data is limited to what is strictly necessary for the purposes for which it is being transferred.

If Personal Data is sent to countries that do not afford the same level of protection as the country in which the Personal Data was collected, AccorInvest will ensure that appropriate safeguards are implemented to manage this transfer (for example through standard contractual clauses or Binding Corporate Rules).

## VII. Rights of the data subjects

As data subjects, Third Parties are entitled to exercise the rights set out in the GDPR and domestic data protection legislation.

The GDPR provides that data subjects have, subject to certain conditions and limits, a right of access, to rectify and erase their Personal Data collected by an AccorInvest Entity. Data subjects also have the right to data portability, to request its restriction or to object to the Processing of their Personal Data. In the limited circumstances where you may have provided your consent to the collection, Processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific Processing at any time.

These rights can be exercised by sending either:

1. An email to one of the following:
  - (i) the relevant country's data protection e-mail address as specified in the **Appendix** to this Privacy Policy;
  - (ii) any other e-mail address indicated by the AccorInvest Entity that collected the Personal Data; or
  - (iii) [group.dataprivacy@accorinvest.com](mailto:group.dataprivacy@accorinvest.com)
2. A letter marked for the attention of the Legal department to either:
  - (i) the registered office address of the AccorInvest Entity that collected the Personal Data; or
  - (ii) AccorInvest Group SA  
26A, boulevard Royal  
L- 2449 Luxembourg, Grand Duchy of Luxembourg.

To protect the Personal Data of the data subject exercising their rights, AccorInvest will need to identify the data subject before responding to the request. If there are reasonable doubts about their identity, the data subject may be asked to provide a copy of an official identity document, such as an identity card or passport, to support his or her request.

The data subjects are entitled to file a complaint with a Supervisory Authority.

## VIII. Glossary

**AccorInvest Entity:** all the legal entities of the AccorInvest Group, i.e., companies controlled directly or indirectly by AccorInvest Group SA.

**AccorInvest:** all AccorInvest Entities.

**Data Controller:** the person who, alone or jointly with others, determines the purposes and means of Processing Personal Data.

**Personal Data:** any information relating to an identified or identifiable individual. An individual who can be identified, directly or indirectly, including by reference to an identifier, such as a name, identification number, location data, online or to one or more specific elements specific to one's physical, physiological, genetic, psychological, economic, cultural or social identity is deemed to be an identifiable individual.

**Processing:** any operation or set of operations performed or not in an automated manner and applied to data or data sets such as collection, recording, organisation, structuring, retention, adaptation or modification, extraction, consultation, use, communication by transmission, circulation or any other form of dissemination, reconciliation or interconnection, limitation, erasure or destruction.

**Recipient:** whether a third party or not any individual or legal entity, public authority, department or any other organisation to which Personal Data is disclosed.

**APPENDIX**  
**DATA PRIVACY CONTACT E-MAIL ADDRESSES**

- **France & Luxembourg:** [donnees.personnelles@accorinvest.com](mailto:donnees.personnelles@accorinvest.com)
- **UK:** [gdpr\\_uk@accorinvest.com](mailto:gdpr_uk@accorinvest.com)
- **Belgium, Netherlands, Luxembourg** (except head office): [gdpr\\_benelux@accorinvest.com](mailto:gdpr_benelux@accorinvest.com)
- **Germany, Austria:** [datenschutz@accorinvest.com](mailto:datenschutz@accorinvest.com)
- **Portugal :** [accorinvest.pt.protecao.dados@accorinvest.com](mailto:accorinvest.pt.protecao.dados@accorinvest.com)
- **Spain:** [accorinvest.sp.proteccion-datos@accorinvest.com](mailto:accorinvest.sp.proteccion-datos@accorinvest.com)
- **Poland:** [pl.gdpr@accorinvest.com](mailto:pl.gdpr@accorinvest.com)
- **Czech Republic:** [cz.gdpr@accorinvest.com](mailto:cz.gdpr@accorinvest.com)
- **Slovakia:** [sk.gdpr@accorinvest.com](mailto:sk.gdpr@accorinvest.com)
- **Hungary:** [hu.gdpr@accorinvest.com](mailto:hu.gdpr@accorinvest.com)
- **Romania:** [ro.gdpr@accorinvest.com](mailto:ro.gdpr@accorinvest.com)
- **Lithuania:** [lt.gdpr@accorinvest.com](mailto:lt.gdpr@accorinvest.com)

The contact e-mail address for Switzerland will be soon completed.