

# Personal Data Protection Policy

## ASTOTEL

In the context of your visit to the site [www.astotel.com/en/](http://www.astotel.com/en/), the management of your reservation, your stay, and the sending of our newsletter, we may process the personal data of prospects (the "Prospect(s)"), visitors (the "Visitor(s)"), and clients (the "Client(s)").

Your personal data must be protected with the utmost care. Their confidentiality and security are our priority.

Thus, ASTOTEL places great importance on complying with applicable data protection regulations, including:

- The General Data Protection Regulation (EU) of 27 April 2016 ("GDPR"), No. 2016/679
- For France, the Data Protection Act of 6 January 1978, as amended ("LIL")

This Personal Data Protection Policy aims to inform Visitors to the site [www.astotel.com/en/](http://www.astotel.com/en/), Prospects, and Clients of ASTOTEL about the processing of their personal data, in accordance with Articles 12 and following of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

This Policy is intended to apply solely to the processing of information (hereinafter "Personal Data") that can identify or make identifiable the visitors to the Site (hereinafter "Users"), prospects, and clients, directly or indirectly. In this policy, "ASTOTEL" refers to the hotels of the ASTOTEL group as listed by following this link and below: [www.astotel.com/en/astotel-legal-notice/](http://www.astotel.com/en/astotel-legal-notice/)

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1. SAS ASTOTEL, having its headquarters on Rue Caumartin in Paris (09);
2. Hotels operated under the following names:
  1. Hôtel Astra Opéra
  2. Hôtel Monterosa
  3. Hôtel Palm
  4. Hôtel Joke
  5. Hôtel Caumartin Opera
  6. Hôtel Astoria
  7. Hôtel Georges
  8. Hôtel Acadia
  9. Hôtel Lorette
  10. Hôtel Augustin
  11. Hôtel 34B
  12. Hôtel Joyce

13. Hôtel le 123 Elysées
14. Hôtel Regent's Garden
15. Hôtel le 123 Sébastopol
16. Hôtel Bradford Elysées
17. Hôtel Malte

In particular, data related to your stays, preferences, and satisfaction are shared among the hotels. This data is used to improve the quality of services and your experience in each of these hotels. In this context, the data controller remains SAS ASTOTEL.

If you have any questions regarding your reservation and/or a future stay, you can contact our customer service directly at [customer.service@astotel.com](mailto:customer.service@astotel.com) and consult the [general terms and conditions](#) where you will find additional information.

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# **1. Purpose of the Data Protection Policy**

ASTOTEL takes measures to ensure the protection and confidentiality of personal data it holds or processes, in accordance with the provisions of the GDPR and applicable national laws.

Within the scope of its website, the management of your reservation, as well as the preparation, management, and invoicing of your stay, ASTOTEL collects, records, consults, modifies, accesses, and/or deletes personal data of Prospects, Visitors, Clients, and former Clients interested in or having purchased ASTOTEL services.

This Policy aims to describe the personal data processing activities carried out in this context, including the origin of the data, the purposes of the processing, the data collected, the retention period of such data, the involvement of subcontractors and partners, scenarios of transfers outside the European Union, how to exercise your rights, and where applicable, how to lodge a complaint.

ASTOTEL commits to limiting the processing of Personal Data to the cases listed in this Policy, or updating it to ensure a high level of protection of Personal Data in compliance with applicable regulations. Specifically, for new service offerings involving personal data processing, ASTOTEL will provide information on how we collect and process your personal data in the General Terms and Conditions available on our website and in this Data Protection Policy.

# **2. Definitions specific to the GDPR**

- **CNIL:** Commission Nationale de l'Informatique et des Libertés, 3 Place de Fontenoy, 75334 Paris;
- **Cookie:** Connection cookies or "trackers" that may be placed in the form of files on the User's browsing platform (Internet Explorer, Opera, Firefox, Google Chrome, Safari, etc.);
- **Client and former Client:** refers to any person who has purchased ASTOTEL services;
- **Data Protection Officer:** The individual delegated to oversee personal data protection as per Articles 37, 38, and 39 of the European Regulation 2016/679 of April 27, 2016;
- **Recipient:** The natural person or legal entity, public authority, service, or any other body to whom personal data is disclosed, whether or not a third party. In this regard, any public authority (Prudential Control and Resolution Authority, Commission Nationale de l'Informatique et des Libertés, National Agency for the Security of Information Systems, etc.) likely to receive disclosure as part of a specific investigative mission (control in the context of combating money laundering and terrorist financing, internal security system audits, etc.), determined by EU law or French national law, is not considered a recipient under this definition but an authorized third party with a right of access;

- **Personal Data:** All information relating to a Client, Prospect, or User, identified or identifiable natural person ("Client" or "Prospect"), directly or indirectly, by reference to an identification number or one or more specific elements pertaining to them;
- **Prospect:** Refers to any person potentially interested in ASTOTEL services who provides their contact details to ASTOTEL in order to receive our offers and news;
- **Controller:** Refers to the natural or legal person who determines the purposes, means, and methods of processing personal data. Unless otherwise specified, the Controller responsible for ensuring compliance with this data protection policy is: ASTOTEL, a simplified joint-stock company registered with the Paris Trade and Companies Register under number 319 032 140, headquartered at 28 rue de Caumartin, Paris (75009), represented by its President, Mr. Serge CACHAN;
- **Processor:** The natural or legal person, public authority, service, or other body processing personal data on behalf of the Controller;
- **Third Party:** A natural or legal person, public authority, service, or body other than the data subject, the Controller, the Processor, and persons under the direct authority of the Controller or Processor authorized to process personal data;
- **Processing:** Any operation or set of operations performed, whether or not by automated means, on personal data or sets of personal data. These operations include collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;
- **Personal Data Breach:** Any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed;
- **Visitor:** Refers to any person potentially interested in ASTOTEL services who accepts cookies on the ASTOTEL public site.

### **3. Scope of the Data Protection Policy**

The present Data Protection Policy covers data processed by ASTOTEL in the context of your navigation on the website [www.astotel.com/en/](http://www.astotel.com/en/), making a reservation, and managing this reservation, including preparing for your stay, managing your stay, post-stay follow-up such as measuring your satisfaction, and subscribing to our newsletter.

This policy does not cover:

- Management of job applications to ASTOTEL, which is detailed on the following page: [www.astotel.com/en/join-astotel/](http://www.astotel.com/en/join-astotel/)
- Management of ASTOTEL employees, for which you should contact our human resources department.

### **4. ASTOTEL's responsibility in Data Processing**

When you browse our website, when we directly present our service offerings, and when you make a request or a reservation, ASTOTEL acts as the Data Controller for your data.

You are considered:

- **Visitors to the ASTOTEL Public Site** when you accept cookies on the ASTOTEL website during your browsing
- **Prospects:**
  - When you provide your information via the ASTOTEL website on an online data collection form, especially the [contact form](#).
  - When you subscribe to our newsletter to stay informed about our offers and services.
- **Customers:**
  - When you purchase a night stay on our website or on the website of one of our partners (e.g., Booking, Expedia...).

## **5. Contact details of the Personal Data Protection Team**

ASTOTEL's contact details and those of our team responsible for personal data protection are as follows:

ASTOTEL  
Private limited company  
28, rue de Caumartin à Paris (75009),  
Represented by its President, Monsieur Serge CACHAN  
Email of the data protection team: [privacy@astotel.com](mailto:privacy@astotel.com)  
Registration number in the Trade and Companies Register: 319 032 140

## **6. Personal Data Processing carried out by ASTOTEL**

By using our website, especially to make reservations or subscribe to our newsletter, you may be required to provide us with Personal Data directly or indirectly through your use of the Site.

Therefore, we collect your personal data as follows:

- Personal data that you provide, for example, during your reservation, when requesting contact, purchasing a service, or subscribing to our newsletter.
- Personal data that we obtain from third-party sources, such as our commercial partners like Booking, Expedia...
- And through your use of our Services, when we place cookies and other trackers, subject to your consent.

## **a. Details on legal bases**

The processes carried out by ASTOTEL serve a specific, legitimate, and clearly defined purpose, based on your consent, the execution of the booking contract, compliance with a legal or regulatory obligation, or legitimate interest.

## **b. Details on the purposes pursued**

When ASTOTEL acts as the Data Controller, ASTOTEL collects your Data for the following purposes:

- **Booking accommodation (contractual service execution):**
  - Managing your reservation,
  - Processing payment for your reservation,
  - Preparing your stay and online registration,
  - Gathering specific requests,
  - Offering additional services,
  - Security deposit handling.
- **Customer service:**
  - Responding to your inquiries, comments, and questions submitted through our contact form,
  - Addressing your specific needs,
  - Handling complaints.
- **Marketing activities**, including regular updates on our service offers,
- **Measuring your satisfaction** and gathering feedback following your stay,
- **Legal purposes**
  - Compliance with legal obligations we are subject to,
  - Anticipating and resolving potential disputes,
- **Technical support** to ensure the proper functioning and security of our website,
- **Service improvement:** enhancing the functionalities and quality of your browsing experience through tests, research, and analysis,
- **Personalisation:** delivering relevant, tailored content based on your interests and geographical location,
- **Astotel social media management:** providing updates on social platforms such as Instagram, Facebook, X, Tripadvisor.

## **c. Details on the Data processed in this context**

As part of your **reservation and the management of your stay**, we ask for:

- identity data (e.g., first name, last name);
- contact details (e.g., phone number, email);
- personal information (e.g., date of birth, nationality);
- information about your children (e.g., first name, date of birth, age);
- your payment data, specifically your credit card number (for transaction and reservation purposes);

As part of the **online registration**, we will ask you to provide information regarding your passport or identity document:

- Information from an identity document (e.g., identity card, passport, or driver's license);

It can also include **additional information** you wish to provide about your upcoming stay:

- Your arrival and departure dates;
- Your preferences and special requests (e.g., double room or not, preferred floor, type of bedding, cultural interests, dietary and beverage preferences, etc.);
- Your questions/comments during or after a stay at one of our establishments.
- Technical and location information generated during the use of our websites and applications.

Finally, it may include any personally identifiable information that you communicate to us during your interactions with our customer service or through our social media accounts.

*Sensitive data collection based on your consent remains exceptional and at your initiative.*

As a principle, we do not collect sensitive information such as racial or ethnic origins, political opinions, religious or philosophical beliefs, union membership, details about health, sexual life, or sexual orientation.

However, if you deem it necessary for such data to be processed for the management of your stay, we will only collect these data with your explicit prior consent.

In such cases, and solely to fulfill your requests or provide you with the appropriate service (for example, a specific dietary requirement), we may collect sensitive data.

*The data that is mandatory to provide and the data that is optional*

During the collection of your data through a form, the mandatory nature of providing the information is indicated by the presence of an asterisk or any equivalent method. Failure to provide this data will result in ASTOTEL hotel being unable to process your request.

Data not marked with an asterisk or equivalent method is optional: it allows Astotel to better understand you and improve our communications and services to you. However, you are not

obligated to provide this data, and failure to provide it will not prevent the processing of your request.

#### *Data of minors*

The collection of information about individuals under the age of 18 is limited unless necessary due to a specific condition of the minor. Only their name, nationality, and date of birth can be provided to us, and these must be provided by an adult. We kindly ask that you ensure your children do not provide us with any personal data without your permission (especially via the Internet). If such transmission occurs, you can contact our data protection service (Article 13 "Your Rights") to have this information deleted.

## **d. Details on retention periods**

All personal data collected are processed and retained for a limited duration based on the purpose of the processing and applicable legislation.

In particular,

- We retain your data for the **performance of reserved services** and up to ten years from your last reservation, unless you object. We aim to provide better service if you return to us even several years after your last stay and to be aware of your previous concerns or requests if you had made any.
- For **Visitors**, upon accepting cookies on the Public Site: IP addresses collected by cookies are retained for 13 months.
- If you subscribed to our **newsletter** or expressed interest in our services, after a period of three years, we may contact you again to inquire if you wish to continue receiving commercial solicitations. You always have the option to withdraw your consent at any time, as specified in the article.
- In **case of dispute or potential litigation**, we may retain any evidence related to your stay in our hotel to assert our rights and defend ourselves in court.

Upon expiration of the retention periods, personal data will be permanently deleted or anonymized.

As an exception, certain data may be archived to manage ongoing claims and litigation, as well as to comply with our legal and/or regulatory obligations, or to respond to requests from authorized authorities. These data will be deleted at the end of the statutory limitation periods.

## **e. Details on the processing of banking data**

Regarding your bank card data:

Financial transactions related to purchases and fees through our website are handled by an external payment service provider responsible for their smooth operation and security. This provider collects and retains, for the duration of your information and at least until your last transaction, on our behalf and for our account, your personal data related to your bank cards. By accepting our general terms and conditions of sale along with this personal data protection policy at the time of your reservation, you are informed that your payment data will be retained until the complete payment of your reservation and any additional services consumed during your stay. They will not be kept beyond the transaction linked to the ASTOTEL service.

Data concerning the visual cryptogram or CVV2 on your bank card is not stored.

## **f. Overview of implemented Data Processing**

<b>Purpose</b>	<b>Data processed</b>	<b>Legal basis</b>	<b>Storage duration</b>
<b>Why are personal data processed?</b>	<b>What personal data are used?</b>	<b>On what legal basis are personal data processed?</b>	<b>How long are personal data retained?</b>
<b>Digital activity</b>			
Analysis of website traffic and performance, and targeting advertising to website visitors	IP address of your computer/laptop, traces, and user IDs from deposited cookies	If strictly necessary, legitimate interest; if cookies other than strictly necessary, consent (for more information, click on the cookie footer of the website)	Duration of IP addresses collected by cookies: 13 months
<b>Reservation and Stay</b>			
Contact request and response	Nature of the request, hotel, name, email, comment	Consent	Duration of request processing and up to 5 years after processing to ensure we have responded definitively and effectively
Response to a quote request for a group	Name and contact details of the person requesting the quote for the group	Pre-contractual steps	Retention in active database: 5 years from the last exchange
Management of the central reservation system which allows	Contact details (e.g., name, first name,	Contract execution	Duration of the stay and up to 10 years after your departure for

ASTOTEL to collect the necessary data for organising your stays in hotels and managing reservations (contractual relationship management, including billing, payment, and reservation tracking directly on the dedicated space of our website)	phone number, email), personal information (e.g., date of birth, nationality), information about companions (e.g., first name, date of birth, age), your arrival and departure dates, your preferences and interests (e.g., double room or not, preferred floor, cultural interests), your questions, comments, and/or feedback during or after a stay at one of our establishments, your specific requests and any information you deem necessary to ensure your stay goes as planned.		data that allows us to ensure, based on expressed preferences, your welcome during future stays.
Payment of the reservation and consumptions	Bank data and, where applicable, particularly when issuing an invoice, identity data of the payer.	Contract execution	Time necessary to complete the full payment of your reservation and any additional consumptions.
Preparation of the stay	Identity data, contact details, stay-related data, and any information you share with ASTOTEL for the proper preparation of your stay (preferences, special requests).	Contract execution	Duration of the stay and up to 10 years after your departure for data that allows us to ensure, based on expressed preferences, your welcome during future stays.
Collection of data necessary for the completion of the so-called "police form"	Name and first name, date and place of birth, nationality, usual residence, mobile phone number and email address (electronic address), date of arrival at the tourist accommodation and expected departure date.	Legal obligation	6 months.

Deposit guarantee	Card number, expiration date (month/year), CVV/CVV, cardholder's name.	Legitimate interest	Until payment of your stay.
Room and hotel area access management	Customer identity verification	Legitimate interest	Until the customer departs.
Additional services management (breakfast, private cinema room rental, honesty bar consumption)	Customer identity verification.	Contract execution	Until the customer departs.
Stay/post-stay monitoring	Complete customer file (email exchanges, reservations, accounting documents, etc.)	Legitimate interest in ensuring a smooth stay	Duration of the stay and up to 10 years after departure for data that helps us ensure, as per expressed preferences, your future stays' welcome.
Complaints management	Complete customer file (email exchanges, reservations, accounting documents, etc.)	Consent and then legitimate interest.	Duration of the complaint processing based on your consent. Up to 10 years after the complaint for defense purposes if necessary and for improving our services and training our staff on similar issues based on our legitimate interest.
Social media management	Any interaction, comment, publication related to Astotel or on a page administered by Astotel and all interactions with our services through our social media accounts	Consent	The duration of data retention depends on social media platforms and users, who can choose to delete/modify data with or without network assistance.
<b>Promotion of ASTOTEL service offers</b>			
Sending our newsletter on our offers and services	Email address, first name, last name	Consent	Retention in active database: 3 years from the last contact
Invitations	Any data necessary for making a reservation on behalf of a guest	Legitimate interest	Duration of the provided service

Group reservations	First name, last name (rooming list) of group members, first name, last name, and contact details of the person booking for the group	Preparation and execution of a contract	Until 10 years after the stay to better welcome these people if they return
<b>Services to professionals</b>			
Booking professional events (seminar rooms)	First name, last name of group members, first name, last name, and contact details of the person booking for the group	Contract performance	Duration of the stay and up to 10 years after your departure for data that allows us to ensure, according to expressed preferences, your welcome during future stays.
<b>Legal grounds</b>			
In certain cases, we may use your data to process and resolve legal actions and disputes, comply with regulatory investigations or applicable law, enforce the service terms, or comply with legal requests from law enforcement authorities.	Any data necessary for this purpose, including identity data, stay details, and payment details.	Legitimate interest	Five years from your stay for legal actions and 6 to 10 years for accounting documents that may be requested by law enforcement authorities.

## **7. When ASTOTEL interacts with partners**

We do not only have the information you provide to us. It is possible that we also receive data about you from other sources. These other sources may include business partners.

In certain cases, ASTOTEL collaborates with third-party business partners who bring in clients by presenting our service offers on their platforms. In this context, ASTOTEL has entered into contracts with these business partners, who specialize in the sale of hotel nights, and these partners transmit to ASTOTEL only the data strictly necessary for managing the reservation request or for managing, tracking, and paying for the reservation.

ASTOTEL ensures that it collects only the data strictly necessary for the purpose for which it is processed.

Our business partners include, but are not limited to, Booking, Expedia, etc.

If you have any questions about the processing of personal data they carry out, we invite you to review their personal data protection policies on their websites.

## **8. Who are ASTOTEL's subcontractors ?**

Dans le cadre de sa prestation, ASTOTEL a recours à des sous-traitants listés ci-dessous auxquels ASTOTEL est susceptible de transmettre vos informations.

Subcontractor Category	Context/Purpose	Data Collected	Data Location
<b>Customer Service (messaging and social media)</b>	Management of customer service and reservation requests via email.	Name, first name, email, phone (optional), number of participants (optional), remarks (optional)	European Union
<b>Reservation Manager</b>	Booking engine	Name, first name, email, phone (optional), number of participants (optional), remarks (optional)	Munich (Germany)
<b>Central Reservation Office</b>	Reservation management tool	All data related to your reservation	Munich (Germany)
<b>Wi-Fi Provider</b>	Wi-Fi connection service	MAC addresses of devices used by our clients	Local hosting, Paris, France
<b>Access Control</b>	Management of access badges for rooms and hotel areas	Name, first name	Local server – Paris, France
<b>Customer Satisfaction</b>	Measurement of customer satisfaction	Name, first name, nationality, date of stay, room number, email, phone (optional), number of participants (optional), remarks (optional)	European Union
<b>Online/Remote Payment Service</b>	Remote payments	Name, first name, and credit card number	European Union (Netherlands) and outside EU via standard contractual clauses
<b>Stay Preparation</b>	Organisation of your stay (pre-	All data related to your reservation	AWS Dublin - Ireland

	check-in)		
<b>Website Host</b>	Website hosting	Name, first name, email, phone (optional), number of participants (optional), remarks (optional)	France
<b>Central Reservation Office</b>	Seminar room reservations	Name, first name, email, phone (optional), number of participants (optional), remarks (optional)	European Union

## **9. Data Recipients / Sharing of your Personal Data**

When navigating the Public Site, the Prospect/Visitor/Client provides ASTOTEL with certain Personal Data necessary for subscribing to ASTOTEL's Service offers.

ASTOTEL is committed to protecting the Data of Prospects/Visitors and to restricting their sharing as much as possible. Each data sharing instance is either necessary to ensure the ASTOTEL Service or justified to help improve the ASTOTEL Service.

Here are the parties with whom some Data is shared:

- **ASTOTEL Employees:** The Personal Data of Prospects/Visitors and Clients may be processed by ASTOTEL employees, within the limits of their respective duties and exclusively for the purposes outlined in this policy.
- **ASTOTEL Subcontractors:** ASTOTEL may use subcontractors to assist in providing services, including Invisible Service Providers.
- **Invisible Service Providers:** ASTOTEL uses the services of technical providers who operate the technical infrastructure needed to maintain the Public Site, including those who host, store, manage, and maintain the Public Site, its content, and the data we process. ASTOTEL also employs technical providers to assist in communicating with you.
- **Auditors, Regulators, and any Administrative or Judicial Authority:** In response to a request based on legal, regulatory, or accounting requirements, or to assert ASTOTEL's rights in court.

## **10. Transfers outside the European Union**

ASTOTEL retains all its data within the European Union and does not transfer personal data outside the European Union. ASTOTEL's servers are managed by Claranet in France.

However, ASTOTEL may use service providers (subcontractors and invisible service providers) whose main establishment is located outside the European Union. This may include transfers to Third Countries for which the European Commission has not made an "adequacy decision." In such cases, ASTOTEL ensures that the transfer is carried out in compliance with applicable regulations and guarantees a sufficient level of protection for the privacy and fundamental rights of the individuals concerned (notably through the European Commission's standard contractual clauses). You can find more details on this in the table listing our service providers.

## **11. Security of your Data**

ASTOTEL is committed to protecting the personal data of its users.

ASTOTEL takes appropriate technical and organisational measures, in accordance with applicable legal provisions (particularly Article 32 of the GDPR), to protect your personal data against destruction, loss, alteration, misuse, and unauthorised access, modification, or disclosure, whether these actions are unlawful or accidental. To this end, we have implemented technical measures (such as firewalls) and organisational measures (such as an ID/password system, physical protection means, etc.) to ensure the constant confidentiality, integrity, availability, and resilience of processing systems and services. When you provide credit card information during your reservation, encryption technology secures your transactions. Organisational measures ensure the security of processing.

More specifically, ASTOTEL systematically encrypts your personal data when it is transmitted over networks to ensure its confidentiality and prevent it from being intercepted by unauthorised third parties.

The servers on which your data is stored are located in closed computer rooms with restricted access to necessary personnel only. This access is strictly controlled to prevent data theft. Logical access is granted only to automated processes and employees who need to access the data to process it.

We require our subcontractors to provide at least an equivalent level of protection.

## **12. Your rights**

The applicable data protection regulations, particularly the GDPR, grant individuals certain rights regarding their personal data, including:

- **Right to Information:** This Policy informs our users about the nature and use of personal data.
- **Right of Access:** You have the right to obtain a copy of the data that ASTOTEL holds about you and to be informed about:
  - The purposes of using this data,
  - The categories of data collected,
  - The recipients or categories of recipients who may have accessed this data,
  - The data retention period or the criteria that determine this period,
  - The existence of other rights (right to rectification, erasure, restriction, objection),
  - The possibility of lodging a complaint with the CNIL,
  - Any information related to the source of the data collected if it was not collected directly from you,
  - The existence of automated decision-making, including profiling, and the underlying logic, significance, and consequences for you of such a decision,
  - The possible transfer of your data to a third country (non-EU member) or to an international organization.

This data protection policy addresses all the points on which you have the right to be informed. Additionally, you can request our DPO to obtain a copy of the data ASTOTEL holds about you.

- **Right to Rectification:** By logging into your personal account, you can directly correct your personal data.
- **Right to Data Deletion/Right to Erasure:** At the request of clients, ASTOTEL deletes or anonymises personal data so that you can no longer be identified, unless an ongoing purpose (such as managing a reservation, managing payments, handling a complaint, compliance with a tax obligation) justifies their retention, or the law authorises or compels us to retain certain personal data. For any request, please contact our Personal Data Protection department by written mail/email.
- **Right to Restrict Processing:** Contact us to request to temporarily or permanently stop the processing of all or part of your personal data; we will comply subject to proof of your interest and provided that they are not essential to our Services.
- **Right to Object:** Contact us to refuse the processing of your personal data for direct marketing purposes.

- **Right to Data Portability:** Contact us to obtain a copy of your personal data in a structured, easily transferable electronic format; please note that not all data can be subject to portability. Only data exclusively concerning you can be subject to portability.
- **Right Not to Be Subject to Automated Decision-Making:** We do not use automated decision-making.

For more information, you can visit the page dedicated to exercising your rights on [the CNIL website](#).

To ensure confidentiality and the protection of your personal data, we will need to identify you in order to respond to your request. Therefore, in case of reasonable doubts about your identity, you may be asked to attach a copy of an official identity document, such as an ID card or passport, to support your request. In such cases, a black and white copy of the front side of one of these documents is sufficient.

All requests will be processed as promptly as possible and in accordance with applicable law.

For any assistance with your requests, please write to the ASTOTEL Personal Data Protection department at [privacy@astotel.com](mailto:privacy@astotel.com) or at the above postal address.

*Special case of requests received by a partner*

Upon the request of a partner Data Controller, ASTOTEL may assist them in responding to requests from Prospects and Clients whose personal data has been entrusted to ASTOTEL.

## **13. Complaint to the Commission Nationale de l’Informatique et des Libertés (CNIL)**

In the event that the rights of the Data Subject have not been respected and after contacting the Data Controller, the Data Subject may file a complaint with the CNIL:

Commission Nationale de l’Informatique et des Libertés

3 Place de Fontenoy

75334 PARIS

Useful link: <https://www.cnil.fr/fr/webform/adresser-une-plainte>

## **14. Minors under 18 years**

ASTOTEL does not offer its services to minors under the age of 18. Given the nature of ASTOTEL's services, we have not deemed it necessary to verify the age of our users. The

collection of information about individuals under 16 years old is limited to their name, nationality, and date of birth, which can only be provided to us by an adult. We thank you for ensuring that your children do not transmit any personal data to us without your permission (especially via the Internet). In the event such transmission occurs, you can contact our Personal Data Protection team (see the "Contact us" section below) to have this information deleted.

## **15. Modifications**

We may occasionally modify this Policy to comply with regulatory, legal, editorial, or technical changes.

In such cases, we will update the "last updated" date and indicate the date when the changes were made.

When necessary, we will inform you and/or seek your consent.

We recommend that you regularly review this page to stay informed of any modifications or updates to our Policy.

## **16. Contact us**

Thank you for reading our Data Protection Policy. If you have any questions, you can contact the Personal Data Protection team at ASTOTEL via email at: [privacy@astotel.com](mailto:privacy@astotel.com).