



# CONFIDENTIALITY POLICY



2L COLLECTION  
HOSPITALITY

## CONTENTS

Article 1. Preamble .....	01
Article 2. Definitions .....	01
Article 3. Contact details & point of contact .....	02
Article 4. Terms of collection of personal data .....	03
(a) Direct collection .....	03
(b) Indirect collection .....	03
Article 5. Characteristics operations .....	03
Article 6. Joint processing operations .....	06
Article 7. Data recipient .....	07
Article 8. Access to social networks fo the 2LCollection group .....	07
Article 9. Computers and freedoms rights .....	08
Article 10. Cookies .....	09
(a) Strictly necessary Cookies (“Technical Cookies”) .....	09
(b) The Cookies and trackers that are not strictly necessary (“Non-technical Cookies and trackers”) .....	09
Article 11. Modification of the confidentiality policy .....	09

## ARTICLE 1. PREAMBLE

- The hotel activities of the subsidiaries of the company PX HOLDING, hereinafter referred to as “2L collection”, covers several luxury hotels, i.e.:
  - a. Le Château d’Andrieu <https://chateaudaudrieu.com/fr/> ;
  - b. Le Cinq Codet <https://lecinqcodet.com/fr/> ;
  - c. Le Château de Fonscolombe <https://www.fonscolombe.com/fr/> ;
  - d. L’hôtel Atmosphères (<https://hotelatmospheres.com/fr/>) ;
  - e. L’hôtel les Lumières (<https://www.leslumieres.com/fr/>)
  
- The 2L Collection Group is very attentive to the protection of privacy of its Representatives, and particularly, the protection, confidentiality, and security of their Personal Data that it collects, within compliance with the General Data Protection Regulation 2016/679 (“**GDPR**”) and the Computers and Freedoms law no. 78-17 (“**LIL**”).
  
- Through this confidentiality policy, the 2L Collection Group wishes to make its Representatives aware of the following:
  - (i) the characteristics of the processing operations of the Data collected and processed;
  - (ii) the commitments given by the 2L Collection Group, to respect the Data of its Representatives and to allow them, if necessary, to exercise their rights as per the Regulations.
  
- To this end, the Representatives are requested to read this document carefully.

## ARTICLE 2. DEFINITIONS

The terms and expressions with a capital letter in this Confidentiality policy have the meaning stated below, regardless of whether they are used in the singular or the plural:

- “**Client**”: physical person who has reserved one or more rooms in one or more Hotels of the 2L Collection Group;
  
- “**Cookie**”: refers to the practice of recording and/or reading information from digital terminals (computer, smartphone, tablet, etc.);
  
- “**Data**”: refers to the personal data of the Representatives, i.e. the information that allows identifying them directly or indirectly, and which is collected and processed particularly when using a Site within the context of a contract request, an online reservation request, etc.;
  
- “**Supplier**”: physical person or legal entity who provides goods or services to the 2L Collection Group;

- **“2L Collection Group”**: refers to the entity formed by the legal entities operating the following 3 hotels: Le Cinq Codet, Château d’Audrieu, Château de Fonscolombe, and the company PX HOLDING, the owner of the said hotels.
- **“Hotel(s)”**: may refer to either le Château d’Audrieu and/or le Château de Fonscolombe, and/or le Cinq Codet;
- **“Representative”**: may refer to either Internet users, Clients, and Prospects of the 2L Collection Group;
- **“Partner(s)”**: person(s) with whom 2L Collection has concluded a contract intended to promote and/or market the rooms and Hotels (for example, “Booking”, “Staycation”, etc.);
- **“Third party Country”**: any Nation that is not a member of the European Union;
- **“Prospect”**: any person identified as probably being interested in the services provided by the Hotels of the 2L Collection Group;
- **“Social Networks of 2L Collection”**: refers to all the pages managed by the 2L Collection and Hotels on social networks (for example Facebook, Instagram, LinkedIn etc.);
- **“Regulations”**: refers to the provisions of the “Computers and Freedoms law” dated 6 January 1978, amended (“LIL”), the General Data Protection Regulation (EU Regulation 2016/679) (“GDPR”) and all other specific provisions applicable to data protection;
- **“Site(s)”**: refers to the website(s) developed by the Hotels;
- **“Internet user”**: refers to any person who browses the Site(s).

### **ARTICLE 3. CONTACT DETAILS & POINT OF CONTACT**

#### **(a) Contact details of 2L Collection and the Hotels:**

- The head office of the company PX Holding (also called “2L Collection” in this document), is located at 6, place des Etats-Unis, 75116-PARIS, France.
- The contact details of the Hotels are as follows:
  - (i) For the Château d’Audrieu: 14250, Audrieu - France;
  - (ii) For the Château de Fonscolombe: Route de Saint-Canadet- 13610 Le Puy-Sainte-Réparate;
  - (iii) For Le Cinq Codet: 5 rue Louis Codet – 75007 Paris;
  - (iv) For l’hotel Atmosphères : 31, rue des Ecoles- 75005 Paris ;
  - (v) For l’hôtel les Lumières : 5, rue Colbert – 78000 Versailles.

**(b) Point of contact:**

- For all requests concerning this document or to exercise their rights, the Representatives of 2L Collection and/or Hotels are invited to write to them, at the address of the choice of the User:
  - through letter, at the postal address of the Hotel and/or 2L Collection Group, whichever is the recipient of the request, and is provided above;
  - through letter to the following address: [privacy@2lcollection.com](mailto:privacy@2lcollection.com)

**ARTICLE 4. TERMS OF COLLECTION OF PERSONAL DATA**

**(a) Direct collection**

- 2L Collection as well as the Hotels collect Data from their Representatives through:
  - a. digital forms, on their respective Sites;
  - b. if necessary, forms during reservations.

**(b) Indirect collection**

- Certain Data processed by the Hotels was collected through their Partners, within the context of online reservations made by the Clients on the respective sites of the latter.
- Within this context, the Data that the Hotels collect indirectly from Clients through their Partners, are as follows:
  - Identification data;
  - Contact details;
  - Details of the reserved stay;
  - The payment method used;
  - Possibly, Data concerning third parties.

**ARTICLE 5. CHARACTERISTICS OF THE PROCESSING OPERATIONS**

- The Representatives' Data is collected and processed according to the characteristics listed below.
- When the processing operation is based on consent, the Representatives have the right to withdraw it at any moment.

N°	End purposes of the processing operation	Person(s) concerned	Legal basis	Period of storage of data*	Processing manager(s)
<b>CHARACTERISTICS OF THE PROCESSING OPERATIONS OF THE DATA COLLECTED FROM THE SITES OF THE HOTELS, THE 2L COLLECTION GROUP, PARTNERS AND CANDIDATES</b>					
<b>1</b>	Management of contact requests made on the Sites	Prospects Clients	Legitimate interest of 2L Collection and the Hotels, i.e. providing information to all the persons who formulate the information requests  Execution of pre-contractual measures taken upon request of the person concerned	For the duration necessary for the management of requests	PX Holding & Hotels
<b>2</b>	Management of recruitments	Candidates for a post within the 2L Collection Group	Execution of pre-contractual measures taken upon request of the person concerned	The storage period of the information thus collected does not exceed two years after the last contact with the Candidate	PX Holding & each Hotel in question
<b>3</b>	Recording and administrative and financial management of the reservation requests	Clients	Execution of the contract	3 years from the latest interaction with the site or from the end of the contract	Each Hotel concerned
<b>4</b>	« 2L Collection » newsletter : • Recording the newsletter subscription requests ; • Sending the newsletter	Clients Prospects	Execution of pre-contractual measures taken upon request of the person concerned  Execution of the contract	For the duration of the subscription to the newsletter	PX Holding
<b>5</b>	Management of the requests formulated through “virtual assistants” present on certain Sites of the Hotels	Clients Prospects	Execution of pre-contractual measures taken upon request of the person concerned	6 months from the latest interaction with the virtual assistant	Hotels
<b>6</b>	Compiling statistics	Clients Prospects	The legitimate interest of 2L Collection and/or each Hotel in knowing about the evolution and effectiveness of the services provided	13 months in case of cookies  The statistics are compiled from the data from active databases, which is stored for the durations given in this table. After this, the data is anonymised	PX Holding  Hotels  Google (For the “Google Analytics” cookies)

N°	End purposes of the processing operation	Person(s) concerned	Legal basis	Period of storage of data*	Processing manager(s)
<b>CHARACTERISTICS OF THE PROCESSING OPERATIONS OF DATA CARRIED OUT WITHIN THE CONTEXT OF MANAGEMENT OF RESERVATIONS AND EXECUTION OF CONTRACTS</b>					
7	Creation and update of client sheets	Clients	Legal obligation  Execution of the contract	3 years from the latest interaction or from the end of the contract; except contracts with a value of more than one hundred and fifty Euros which shall be archived for a duration of ten years from the end of the commercial relation	Hotels
8	Administrative and financial management of the telephone or mail reservations	Prospects  Clients	Execution of pre-contractual measures taken upon request of the person concerned  Execution of the contract	3 years from the latest interaction with the site or from the end of the contract	Hotels
9	Administrative and financial management of other requests from Clients (SPA, restaurants, transports, etc.)	Clients  Third parties (accompanying the Clients)	Execution of pre-contractual measures taken upon request of the person concerned	3 years from the latest interaction with the Site or from the end of your contract	Hotels
10	Management and control of access to rooms	Clients  Hotels staff	Execution of the contract  Legitimate interest of Hotels in controlling and ensuring that only authorised persons can access the rooms	As regards the clients, the time of their stay  As regards the Hotel staff, for the entire duration of their employment contract	Hotels
11	Archiving the access history of the Hotel rooms	Clients	Legitimate interest of the Hotels, to ensure safety and check the legitimacy of access to the rooms	The data is deleted after every 600 connections, which is every 2 months on average	Hotels
12	Measurement of Client satisfaction	Clients	Legitimate interest of the Hotels & PX Holding in knowing the perception of the Clients about the services provided	Satisfaction surveys are completed by the Clients in the Hotels, and the results are stored Beyond this, the data is anonymised	PX Holding & Hotels

N°	End purposes of the processing operation	Person(s) concerned	Legal basis	Period of storage of data*	Processing manager(s)
<b>CHARACTERISTICS OF THE PROCESSING OPERATIONS OF DATA CARRIED OUT WITHIN THE CONTEXT OF MANAGEMENT OF RESERVATIONS AND EXECUTION OF CONTRACTS</b>					
13	Video-surveillance	Clients Hotel staff	Legitimate interest of the Hotels, to ensure the safety of the people and goods	1 month  The data may be communicated to the police department or legal authorities following such a request	Hotels
<b>PROMOTION OF SERVICES OFFERED BY THE HOTELS</b>					
14	Prospection	Clients Prospects	Legitimate interest when the prospection is carried out with Clients  Consent when the prospection is carried out with Prospects	3 years from the latest contact with the Client or the end of the contractual relation  3 years from the latest contact or the collection of data of the Prospect	PX Holding & Hotels
15	Social networks management	Clients Prospects Third parties	Holding and of the Hotels to maintain relations with its contacts (Clients and Prospects), and to promote its services on social networks	Refer to the confidentiality policies of the relevant networks ( <i>See below</i> )	PX Holding & Hotels

*(\*) At the end of these storage periods, the Data is archived in a secure manner for the necessary storage durations and/or statute of limitations resulting from the applicable legislative or regulatory provisions. In pursuance of these periods, the Data shall be deleted, in accordance with the Regulations in force.*

## **ARTICLE 6. JOINT PROCESSING OPERATIONS**

- The processing operations no. 1, 2, 6, 12, 14 & 15 above are carried out under the joint responsibility of 2L COLLECTION and each one of its Hotels.
- In compliance with Article 26 of the GDPR, the purpose of this clause is to make all the Representatives aware of the broad outlines of the agreement that 2L Collection has entered into with the Hotels.
- Thus, 2L Collection is the primary point of contact through mail of the Representatives as regards exercising their rights. 2L Collection is in charge of communicating the requests to the Hotels if necessary. Evidently, the requests sent directly to the Hotels through mail shall be processed by them, unless these exclusively concern 2L Collection.



- As for the Hotels, they are responsible for informing Clients when they make their reservations directly in the establishments. Consequently, this confidentiality policy must be communicated to all their Clients, along with their information notices if necessary. `
- The recipients of your data may be located abroad, including outside the European Economic Area. Any transfer of your data outside the European Economic Area is subject to appropriate safeguards, including contractual safeguards or our internal rules, in compliance with applicable data protection regulations.

## **ARTICLE 7. DATA RECIPIENTS**

- All the transfers, as well as the relations with the Data recipients, are strictly supervised by the 2L Collection Group.
- The Data transfers are primarily carried out between the Hotels and 2L Collection, and also between the relevant internal services, particularly to the specially authorised technical personnel, and in compliance with the purposes listed in the Article “Characteristics of processing operations”.
- 2L Collection and the Hotels may also have to communicate certain Data to their Suppliers (sub-contractors). These sub-contractors are obligated to ensure the confidentiality, integrity, and security of the Data communicated to them, and to use the said data only within the context of the execution of their task.
- In special circumstances, Data can be disclosed, when they are required to do so by legal and administrative authorities that have a legitimate need to know.

## **ARTICLE 8. ACCESS TO SOCIAL NETWORKS OF THE 2L COLLECTION GROUP**

- Certain Sites allow accessing the pages of the Social Networks created by 2L Collection and/or Hotels by clicking on certain of the tabs present. When Internet users click on these links, Data concerning them is automatically communicated to the Social Networks. Consequently, these Networks process the Data within the context of processing operations for which the 2L Collection Group is a third party. Consequently, the latter shall invite the Internet users to consult their respective confidentiality policies to know the characteristics, and if required, to exercise their rights.

Here are some links:

- Facebook confidentiality policy: <https://fr-fr.facebook.com/privacy/explanation>
- Instagram confidentiality policy: <https://frfr.facebook.com/help/instagram/155833707900388>
- LinkedIn confidentiality policy: <https://www.linkedin.com/legal/privacypolicy? l=fr FR>

- Moreover, we would like to inform you that browsing on the Facebook pages of 2L Collection and/or Hotels shall result in Data being processed for preparing statistics under the joint responsibility of 2L Collection, and if required, of the Hotels, and of Facebook Ireland Limited, where the latter assumes primary responsibility for the said processing operation in accordance with the addendum published by it and available at the following address:  
[https://fr-fr.facebook.com/legal/terms/page\\_controller\\_addendum](https://fr-fr.facebook.com/legal/terms/page_controller_addendum)

## ARTICLE 9. COMPUTERS AND FREEDOMS RIGHTS

- In their capacity of “person concerned” for the processing operations described in this document, and in compliance with the applicable Regulations, all the Representatives have the following rights:
  - **a right of access**, i.e. obtaining confirmation whether the Data has or has not been processed, and if yes, access to the said Data, as well as the different information including the purposes of the processing operation, the Data category, the recipient(s) of the Data, etc.
  - **a right of rectification**, at the earliest, for Data which is inaccurate, incomplete, expired, or ambiguous, or which it is prohibited to collect or process;
  - **a right of opposition** to the processing of Data by the processing manager or to a Data transfer, unless there are legitimate and important reasons which prevail over your interest;
  - **a right to delete** Data for the following reasons:
    - The Data is no longer necessary in view of the purposes for which it was collected or processed;
    - the consent on which the processing operation was founded was withdrawn, and there is no other legal reason for processing the Data;
    - the processing of the Data is opposed and there is no superior interest justifying the execution of the processing operation;
    - the Data was processed illegally;
    - The Data must be deleted to comply with the legal obligation to which 2L Collection and/or the Hotels may be subject;
    - The Data was collected when the Representative was a minor.
  - **a right to organise in advance and during their lifetime, the conditions in which the Data shall be stored and communicated, after death;**
  - **a right to portability and recovery of Data** that allows receiving Data sent in a structured format, currently used and legible for a machine, and to communicate it to another processing manager.
- In the event one of these rights is exercised digitally, the responses provided shall be, if necessary, through digital means whenever possible, unless the Representative has specifically requested otherwise.
- In the event the responses provided are deemed unsatisfactory or incomplete, all the Representatives have the possibility of filing a claim with the CNIL (National Commission for Information Technology and Civil Liberties), the national control authority tasked with ensuring compliance with the obligations in terms of protection of personal data.

## **ARTICLE 10. COOKIES**

### **(a) Strictly necessary Cookies (“Technical Cookies”)**

The exclusive purpose of certain Cookies is to allow or facilitate the communication digitally, or they are strictly necessary for the provision of online communication services upon the express request of each User. In compliance with Article 82 of the LIL, the User’s consent is not required for using these cookies which result in the processing of Data necessary for the continuation of the legitimate interest of the Hotels and/or 2L Collection Group, i.e. for the correct technical management of their Site.

These are primarily session cookies which allow authentication and log-ins to the Site(s) as well as the memorisation of the browsing information during a session (for example to ensure the authentication of the User by remembering the means of authentication during a session, or even the choice of legal language, etc.)

### **(b) The Cookies and trackers that are not strictly necessary (“Non-technical Cookies and trackers”)**

The 2L Collection Group uses the advertisement Cookies and trackers which record information concerning the preferences of Internet users by analysing their browsing on the Sites which it develops and also on third party sites, which allow optimising the Sites, and also to adapt the content proposed to their interests.

Among these Cookies, there are third party Cookies and trackers which may be installed on the Users’ terminal when they browse the Sites. The purposes of these Cookies are the preparation of statistics and facilitating the redirection of Internet users towards the social networks pages published by 2L Collection, and by each Hotel concerned.

An information strip is displayed at every first visit. The purpose of this strip is to give prior information to Internet users about the specific purposes of the use of Cookies and trackers, to obtain their consent, and if required, to allow them to oppose all or part of the Cookies and tracers which are stored on the digital terminals.

## **ARTICLE 11. MODIFICATION OF THE CONFIDENTIALITY POLICY**

To ensure that this confidentiality is exhaustive at all times, it may be modified. In such a case, the updated document shall be communicated to all Representatives through all means.

*Last updated on May 31<sup>th</sup> 2024*