

## 1. CORPORATE INFORMATION

#### **TEOVIAN TRAVEL GROUP**

Registered office: 74 Boulevard d'Italie - 98000 Monaco, Principality of Monaco

Email: privacy@teovian.com Telephone: +377 99 99 45 32

#### 2. INTRODUCTION

In **TEOVIAN TRAVEL GROUP**, we are committed to protecting the privacy of our users. As data controllers, we manage our clients' personal information in accordance with applicable laws, including Monegasque Law No. 1,165 of 1993 and the European General Data Protection Regulation (GDPR).

# 3. SCOPE AND OBJECTIVE

The purpose of this policy is to explain how we collect, process and protect the personal data that you provide to us, both through our website and our social networks (Facebook, Twitter, Instagram, YouTube, among others).

# 4. PERSONAL DATA COLLECTED

#### 4.1. Data Collected through the Website:

- Name, surname, address, date of birth, sex, copy of passport and food preferences.
- Connection, website usage and location information.

## 4.2. Data Collected in Telephone Calls:

• Identity, voice, addresses, contact details, telephone number, date, time and duration of the call, content of the conversation.

#### 4.3. Social Network Data:

 Information provided by the user, such as comments, photos, videos and other published content.

#### 4.4. Administrative Data:

• Travel references and contact information, except payment information.

## 5. PURPOSE OF DATA PROCESSING

The personal data collected is used for the following purposes:

- Access Management: Authentication and data verification to access the platform.
- Site Optimization: Improve the operation and user experience on our website.
- **Commercial Relationship:** Manage the relationship with the client and manage disputes if any.
- Analysis and Statistics: Conduct market research, measurement and reporting to adapt marketing strategies.
- Fraud Prevention: Detect and manage security incidents.
- **Sending Commercial Information:** Offer communications and advertising according to customer preferences.

## 6. LEGAL BASIS OF TREATMENT

The processing of personal data is based on:

- The execution of the service contract with the client.
- The express consent given (via checkboxes, clicks, etc.).
- The legitimate interest of the company, such as dispute management or business prospecting.
- Compliance with legal obligations imposed by current regulations.

## 7. RECIPIENTS OF THE DATA

**TEOVIAN TRAVEL GROUP** may share personal data with third parties under the following circumstances:

- **Suppliers and Business Partners:** For the execution of contracted services (airlines, hotels, shipping companies, insurance companies, etc.).
- **Payment Services:** With banking entities for the management of financial transactions.
- Customer Service Providers: That manage advertising, product delivery or support services.

- Legal Obligations: To comply with administrative, judicial or regulatory procedures.
- **Mergers or Acquisitions:** In the event of corporate reorganization, the data may be transferred to a third party upon notification.

**International Data Transfer:** Personal data will only be transferred outside the European Union and Monaco in secure environments, in compliance with current regulations.

## 8. DATA CONSERVATION PERIOD

The data will be kept for the following periods:

- Administrative Documentation: 10 years.
- Billing and Accounting Records: 10 years.
- Client Files: 5 years since the last business relationship.
- Cookies and Audience Statistics: 6 months.
- Telephone Recordings: 180 days.

#### 9. SECURITY AND CONFIDENTIALITY

**TEOVIAN TRAVEL GROUP** employs physical, technical and organizational measures to protect personal data against unauthorized access, loss, alteration or destruction. In case of outsourcing, we guarantee that our suppliers meet high standards of security and confidentiality.

#### 10. USER RIGHTS

Users can exercise the following rights at any time:

- Access: Obtain information about the personal data that the company has stored.
- Rectification: Request the correction of inaccurate or outdated information.
- **Elimination:** Request the deletion of data when it is no longer necessary for the established purposes.
- Portability: Receive a copy of the data in digital format.

To exercise these rights, you must send a written request to "TEOVIAN TRAVEL GROUP - Data Protection Service" at the indicated address or via email privacy@teovian.com. The application must include signed proof of identity.

In case of disagreement, the user can file a claim with the *Nominative Information Control Commission* of Monaco or before the *CNIL* in France.

## 11. COOKIE POLICY

#### 11.1. What are Cookies?

A "Cookie" is an electronic file placed on your device (computer, tablet, smartphone) that stores information about your browsing on our website. These cookies can be used to facilitate navigation and improve the user experience.

# 11.2. Types of Cookies Used:

- Essential Cookies: They allow navigation and access to secure areas of the site.
- **Performance Cookies:** They collect anonymous information about the use of the website to improve its operation.
- **Social Network Cookies:** They allow you to interact with third-party social network modules integrated into our website.

# 11.3. Cookie Management:

The user can delete or block cookies through their browser settings. For more information, you can consult the guide provided by the CNIL at the following link: https://www.cnil.fr/fr/cookies-les-outils-pour-les-maitriser.