

## Privacy and Data Protection Policy

### 1. Introduction

This Privacy Policy applies to your personal data that we collect, use and store when you use our website (with the trademark Option Way or in partnership with another website with the trademark “powered by Option Way”), when you create an account, when you book a flight or any other product or service, or when you contact us.

Option Way is responsible for the collect and the use of your personal data as described in this Privacy Policy. If you have any questions, comments or claims, regarding the use of your personal data by Option Way, you can contact our Data Protection Officer (DPO) by email : [dpo@optionway.com](mailto:dpo@optionway.com).

Option Way is a french travel agency in compliance with the french regulation regarding its activities of selling flights and other travel products or services on its websites. Option Way is registered within Atout France (the travel french Authority) as a travel agency, member of the French Professional Tourism Association (« Association Professionnelle de Solidarité du Tourisme (APST)”), and agreed by the International Air Transport Association (IATA).

Option Way is a french limited company (« Société par Actions Simplifiée (S.A.S.) ») with a capital of 233 187 euros, registered at the Commercial Register of Cannes (RCS Cannes n° 752 774 521), and having its head office at Parc Haute Technologie, avenue Maurice Donat, Sophia-Antipolis, 06250 Mougins.

### 2. The collected data

#### 2.1. Data provided by the user

Option Way collects data regarding the identity of the user (gender, first names, last name, date of birth, email, phone number, password...) when you provide these data in order to subscribe to our offers, when you create an account, or when you try to buy or you buy flight tickets.

When you try to buy or when you buy flight tickets, Option Way collects data regarding the identity of the passengers des informations relatives à l’identité des passagers (gender, first names, last name, date of birth, email, phone number, frequent flyer programs...).

The collected data also concern the information about the search of flights and the bookings (search criteria, details of the itineraries searched or booked, details of the prices...).

## **2.2. Data collected by using our website or our services**

By using our website or our services, including our Customer Service, Option Way collects informations about the use of the website and about the users' experience.

When you contact our Customer Service by email or by phone, we record these relationships in our systems in order to follow the actions done or to be taken for each user about its questions, requests or purchases already done.

When you visit our website, we collect some information, and in particular your IP adress, the type of your browser, and your behaviour on the website. We also collect informations by using cookies, scripts, pixels, or similar technologies. If you receive an email or a newsletter from us, we track if and when you open it and if you clic on a link.

## **3. The use of the data**

Option Way uses the collected data for several purposes:

**a) To perform the flight bookings and the post-sales operations.**

Most of the collected data are used in order to perform the flight bookings requested and made by the users, and also the post-sales operations, in particular by contacting the users. It may also concern other travel products or services.

**b) To communicate with the users.**

Some of the collected data are used in order to communicate with the users who have given their consent to be informed about our offers and services. It mainly concerns emails and newsletters. The users who have given their consent can modify their choice at any moment on the website.

**c) To improve our service.**

Some of the collected data are used in order to improve our website and our services. These data are processed to analyze the behaviour of the users on the website (audience, origin of the users, analysis of the funnel, types of search and bookings...).

**d) To be compliant with our contractual, legal, tax and accounting obligations.**

Some of the collected data are used in order to be compliant with our legal obligations (in case of claims from users or in case of fraud for example), contractual obligations (for instance with the airlines), tax and accounting obligations (in case of control by the french authorities).

## **4. The sharing of data**

Option Way shares some of the collected data with service providers, being third parties, in order to perform and follow our services. Option Way shares most of the collected data for the flight bookings with several global distribution systems (Galileo France, Amadeus, Travel Fusion), as well as with each of the concerned airline for the flight booking. Option Way shares also the data with other service providers for the related products or services sold to the users, as for example with the insurance broker Presence Assistance and with insurance companies for the travel insurances.

Moreover, when the user visits a version of our website in partnership with another website (website of an airport, a travel agency, a marketplace between travel agencies and travelers, or any other kind of website), Option Way shares some of the collected data with the partner who commercialize the website of Option Way in partnership. The partner is clearly displayed on the Site with « powered by Option Way » as additional information, allowing users to be informed that a partnership exists

between the partner and Option Way. Users are informed of this data sharing in the General Term of Use of the Option Way Site. Partners use these data to offer and execute their own services.

Option Way may also share some collected data to comply with legal obligations or claims, such as in the case of a request from the regulatory authorities of the company.

## **5. Payment information**

Anyone wishing to complete a purchase on the Site must provide the information of their payment card. The payment is processed by Point Transaction Systems (Paybox Verifone) and by Sogecommerce (Société Générale et Lyra Networks), which are a third-party PCI DSS payment processors. We neither receive nor store any payment card details ourselves. Your payment details are received only by these third-party payment processors (redirection) and are not shared with Option Way. However, Option Way receives information regarding the payment card acceptance or refusal from the third-party payment processors.

## **6. Data storage and security**

We store the personal data that we hold about you through external service providers offering cloud storage space. Option Way uses two external service providers (OVH and Amazon Web Services) that host the data in the European Union.

The Option Way Site is secured for the transmission of information through the HTTPS protocol and a SSL certificate provided by Digicert. The personal data collected is encrypted by Option Way to secure its storage. The access to the databases is also secured through private logins. The collected data is stored for a maximum of 10 years for the performance of some legal obligations.

## **7. Your rights**

In accordance to European and French privacy laws, you have many rights regarding the data collected by Option Way:

### **a) Right to access your data**

You have the right to access your personal data and you may ask us what kind of data we collected about you and to receive a copy of that data. We will provide you with all of the data that we have about you and also provide you with the purpose and the legal basis.

### **b) Right to rectify your data**

You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct your data. You can also modify your data directly on our website.

### **c) Right to erase your data**

You have the right to have your personal data erased, in compliance with article 17 of the General Data Protection Regulation (GDPR). This concerns your personal data that is no longer necessary in relation to their initial storage purpose and legal basis. Under these circumstances, we will erase the given data.

### **d) Right to restrict the processing of your data**

You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continue storing your personal data. We will inform you before the restriction is lifted.

### **e) Right to receive your data and have it transferred to another controller.**

Your personal data is portable – i.e. you to have the flexibility to move your personal data to other service providers as you wish. That means that you have the right to receive your Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.

**f) Right to object**

You have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data.

If you wish to exercise any of these rights, please contact our Data Protection Officer ([dpo@optionway.com](mailto:dpo@optionway.com))

**8. Links to other websites and social media**

Our Sites may contain links to the websites of our partners or third-party companies. These websites have their own Privacy Policy and Option Way do not receive responsibility or liability for the data collected by them.

**9. Change to this Privacy Policy**

Option Way reserves the right to modify this Privacy Policy at any time by updating it on the Option Way websites. The date of the last modification is indicated on the first page of this document. The English version of this Policy is for information only, as the French version prevails on the English version.

**10. Contact us**

If you have any questions, remarks in relation to this Privacy Policy or if you wish to exercise your rights, please contact our Data Protection Officer at [dpo@optionway.com](mailto:dpo@optionway.com) or:

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