

Personal data protection policy

Our customers

Last update: 16 august 2023

Art. 1. Introduction

1.1. Information on Ardennes-étape

Ardennes-étape is a registered trademark of ASTERIA srl whose registered office is located in Belgium at 4970 Stavelot, Avenue Constant Grandprez 29. You can contact ASTERIA srl by telephone on +32 80 29 24 00, or via <https://en.ardennes-etape.be/contact>

ASTERIA srl is registered under VAT number BE 0473952094 and is registered with the Crossroads Bank for Enterprises under number 0473.952.094.

Ardennes-étape mainly processes the personal data of **RENTAL CUSTOMERS** so as to ensure the booking of the accommodation properties listed on its platform.

In this context, Ardennes-étape acts as "data controller" in accordance with the current data protection legislation, the European Personal Data Protection Regulation 2016/679 (the "GDPR").

1.2. Protecting your privacy is our priority

Ardennes-étape is a trusted partner and works daily to protect your personal data.

Our Data Protection Policy seeks to explain how we collect, store, use and transfer your personal data while fully upholding the trust that you place in us.

It also describes your rights with respect to the management of your data and how you can exercise it.

Art. 2. Collection of your personal data

2.1. For what purpose do we use your personal data?

- acceptance and processing of your registration on www.ardennes-etape.com, and your current or future booking or order;
- sending all documents related to your booking to your e-mail address;
- statistical calculations, testing, surveys and general customer relationship management, including product promotions by Ardennes-Etape or one of its affiliates. For our statistics, we collect information on pages visited and your IP address, in order to distinguish individual sessions;
- sending information letters from Ardennes-Etape, by traditional mail or electronically;
- notifications regarding services, activities or tourist attractions, with or without promotions, organised in the vicinity of the holiday home you have booked during your stay;
- organising contests;
- sending targeted advertising via newsletters, Facebook, Google, Bing and Criteo at the initiative of interested current and prospective customers;
- sending Ardennes-Etape newsletters to current and prospective customers who have registered on our website or one of our blogs, through participation in a contest, during a campaign on a third-party site or during one of our actions on the ground;
- sending a welcome message, practical information on your online booking and promotional offers to your mobile phone number.

Ardennes-étape will request your express permission for any further use of your personal data.

2.2. How do we collect your personal data?

Ardennes-étape can collect your personal data in different ways:

- They can be collected as part of a booking made on our site;
- They can also be collected when you fill out the contact form on Ardennes-étape's various blogs. In such a case, they will only be stored in our management system if you give your express consent. In all other cases, the personal data will be deleted;
- If you participate in a contest, with your explicit consent;

- They can be collected if you contact Ardennes-étape by telephone or email, whether to request for information or for help in booking a stay, and you give your consent for the storage and processing of the data required to carry out the task. Where your consent is not given, the information recorded during the call will be saved for 30 days to allow Ardennes-étape to do any required follow-up under the best conditions. The data will automatically be deleted after this short period;
- They can be collected if you respond in the affirmative to the question from our operator on whether you wish to be registered on Ardennes-étape's emailing list.
- Property owners can also be able to collect data on their holidaymakers through the management system provided by Ardennes-étape. Ardennes-étape has created a process that encrypts your data and thus ensures that it is only usable by person(s) with access to this management system. Under no circumstances will Ardennes-étape take the initiative to use this data in any way whatsoever that entails it not taking responsibility for the processing that will be done by the owner.

2.3. What type of personal data do we collect?

Your first name, surname, language, country, town, postal code, street, house number, date of birth, telephone number, email address, IP address, bank account and/or credit card number and gender.

Art. 3 Collection and use of your personal data for direct marketing purposes

3.1 Purpose of the process

Ardennes-étape processes your personal data in order to send you the most relevant information and to contact you on the basis of your previous bookings. To this end, we use various means such as e-mails and newsletters. We rely on our legitimate interests (business interests) as the legal basis for this processing activity.

3.2. What types of personal data do we collect?

- Customer identification
- Full name;
- E-mail address;
- Choice of language;
- Duration and date of visits;
 - Date of previous stay;
 - Date of future stay, if applicable;
- Personal interests and preferences.
 - Average satisfaction score given in the satisfaction survey (NPS);
 - Capacity of accommodation during previous stays;
 - Presence of pets;
 - Name of the group segment (couple, friends, family, school, multiple families, etc.);
 - Accommodation facilities;
 - Tourist region of accommodation;
 - Postcode of the commune.

3.3 How long do we keep your personal data?

We will retain this personal data for a maximum of 12 months after your last stay, unless you inform us earlier that you no longer wish to receive targeted and personalised direct marketing communications.

In each communication you receive for direct marketing purposes, you will always have the opportunity to unsubscribe from these communications.

Of course, your other rights set out in Article 8, which can be easily exercised by contacting us in accordance with Article 10, will also remain guaranteed.

Art. 4. With whom do we share your personal data?

Ardennes-étape communicates to the owner of the rented house, its administrative manager and/or its reception manager, your surname and first name, your address, your telephone number, and where applicable, your mobile number, your email address and bank details (for the refund of the deposit).

In the event of a complaint or a dispute resulting from a service offered through Ardennes-étape, if the processing so requires it and after having informed you, certain data may be communicated to third parties: to a competent authority, your representative, the opposing party or their representative.

If you opted for a "cancellation" or "rental damage" insurance policy, the following data will be communicated to the insurance company:

- Reservation ID
- Surname
- First name
- Town

Art. 5. Protection of your personal data?

When we transfer or receive your data on our site, we always use encryption technologies that are recognized as proven standards. We are constantly striving to put in place physical, administrative, technical and organisational measures in order to protect your personal data against unlawful access, use or disclosure.

Art. 6. Retention of your personal data?

Your personal data are kept only for the period required for the purposes for which we collected them taking into account the legal obligations relating to accountability.

In this context, your data will be kept for 10 years after the completion of our task. They will not be sent to any third party other than those specified above and for the purposes stated above.

Art. 7. Data relating to minors?

Ardennes-étape does not offer property for rent to minors and therefore does not collect any personal data relating to them. If it is brought to our attention that we are in possession of personal data relating to a person under the age of 13, we will delete this information as soon as possible.

Art. 8. Your rights?

You can access all of your data for free and at any time by logging on to your personal page on www.ardennes-etape.com, and where if need be you can correct them.

Since you provide the data, ASTERIA srl cannot be held responsible for their content.

By written request accompanied by proof of your identity, addressed to the data controller, whose address is provided below, you can receive for free a record of your personal data as well as have incomplete or irrelevant data deleted or, where necessary, corrected.

- Asteria srl - Ardennes-étape - Privacy, Avenue Constant Grandprez 29 B-4970 Stavelot Belgium
- privacy@ardennes-etape.com

If you no longer wish to receive advertising from us via mail, telephone or email, you can let us know via <https://en.ardennes-etape.be/contact>.

Were we to fail in our duties, a complaint can be filed with the regulatory body of your country. You will find a complete list of European regulatory bodies here: http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=50061

For Belgium, the competent body is the Privacy Commission whose contact details are as follows:

Privacy Commission
Rue de la Presse 35
1000 Brussels
Tel. +32 2 274 48 00
Email: commission@privacycommission.be
Website: <http://www.privacycommission.be/>

Art. 9. What happens if we amend our Personal Data Protection Policy?

Our Data Protection Policy may evolve in order to reflect changes in the way we process your personal data.

In such a case, we will inform you so that you can read our new Data Protection Policy before making any new accommodation booking.

You can check the date of the last revision at the very top of the document.

Art. 10. How to contact us?

If you at any time wish to obtain more information or to send us a comment or complaint, you can send us an email (privacy@ardennes-etape.com); we will endeavour to get back to you as soon as possible.

Art. 11. Cookies?

Our website uses cookies, small temporary files stored on your computer and containing information to be used on our site, and without which our site will not work properly. They also allow us to customise our offering and content.

Cookies allow us to carry out targeted advertising via Facebook, Google, Bing and Criteo to customers and prospects who wish to

receive it.

Want to learn more?

- www.ardennes-etape.com/cookies
- Facebook Privacy Policy: <https://www.facebook.com/policy.php>
- Google Privacy Policy: <https://policies.google.com/>
- Bing Privacy Policy: <https://privacy.microsoft.com/fr-fr/privacystatement>
- Criteo Privacy Policy: <http://info.criteo.com/privacy/informations>

Art. 12. Sharing my photos on the social media of Ardennes-étape with #YESARDENNESETAPE?

We love to see your beautiful holiday moments with Ardennes-étape on social media and may request to share these photos/videos on our own channels. The channel where we will publish the photos will primarily be the Ardennes-étape website (ardennes-étape.be) but could also include the Ardennes-étape newsletter or our own social media channels.

By responding to our request with the hashtag #yesardennesetape and tagging us with @ardennes_etape, you:

- give Ardennes-étape, the permission to use your photo in their marketing and / or advertising, including in the gallery on the website (ardennes-étape.be), newsletters, social media, e-mail, other customer communications and other marketing purposes.
- grant Ardennes-étape the permission to use your photo until you withdraw your permission

You will get:

- Free publicity on our channels and our website (www.ardennes-etape.be)
- Full credit for your own picture: your social media channel will be linked and/or name is mentioned
- The possibility to withdraw your given permission at any moment in time

By agreeing to these terms, you give Ardennes-étape a non-exclusive, royalty-free and worldwide license to use and share your photo for marketing and/or advertising purposes, including the right to reproduce, distribute, alter and edit your photos. You represent and warrant that you own or control the rights to the material you have submitted and that you have permission from any person(s) appearing in the photos. In case products of other brands appear on the photo and this brand is mentioned on your photo, we will also mention this brand when sharing your photo. If other brands would be displayed in your photo but are not mentioned, we also can not mention this brand. Nevertheless, we can always add a mentioning later on, after request. The photo will remain your property at all times and given permission can be withdrawn.

Withdraw permission

If you would like to withdraw your permission, you can send us an e-mail at marketing@ardennes-etape.com and we will remove your photo from our digital channels within 14 days. If we have used your photo in our newsletter and/or magazine, it is not possible to remove the photo, but we will not use it again in the future.

We look forward to sharing your beautiful photos of your moments with Ardennes-étape.