



PRIVACY POLICY

November 2023

PRIVACY STATEMENT

This is a short overview of the processing of your personal data by WELL'COM (hereinafter referred to as "we").

We specifically detail how we collect, handle, store or otherwise process your personal data ("data") you submit to us.

A personal data is data which allows your identification as a natural person either directly, or through a combination of different information sources indirectly.

The section below will provide you with the full details regarding the processing of your personal data.

WELL'COM as Data controller and Data protection officer is committed to respecting your privacy and your data.

The purpose of this Privacy Policy is to explain how we will use any personal data we collect about you, the rights you have over any personal data we hold about you, and to tell you about the policies and procedures that we have in place to respect your privacy and keep your personal data secure.

1. About WELL'COM

Well'com is in the business of providing premium Services including but not limited to the following: premium hosting, meet & greet services, luxurious hospitality services, premium activities, car rentals (with and without driver service); special and exclusive services hereinafter referred to as the "Services".

References to Well'com includes (without limitation) Well'com Group, Well'com Air, Well'com Services, L'exceptionnel by Well'com.

2. Personal Data collected, and how we collect your data

We use your data to provide you with a unique premium experience. We also use your data to provide you with services that suit you better.

The categories of personal data we collect and use include:



- first name;
- last name;
- gender;
- date of birth;
- email address;
- address, location;
- means of payment (bank account details, payment card information);
- information about the Services we provide to you (including for example, what we have provided to you, when and where and, if applicable, how much you paid);
- information about transactions you make with other companies for events and services related to Well'com Services;
- information you provide to us with when you contact us by phone, email, post, or when you communicate with us via social media;
- information you provide to us about your health (for example when you need wheelchair accessible spaces, when you request a sign language interpreter, or when we are investigating an accident which may have happened during the Service);
- any other personal data which you may disclose to us when you use our Services at any time.

We will receive your personal data when you provide them to us yourself or when you use or purchase one or more of our Services.

We also receive personal data about you from third parties (airlines companies, rail companies, social media companies (only public information))

3. How we use your data

All personal data that we obtain about you will be used in accordance with current data protection law and this Privacy Policy.

We, or third party data processors acting on our behalf, will process your personal data as follows:

- As necessary, to perform a contract with you, such as a contract to process an order from you for one or more of our Services including, where applicable, taking payment and carrying out fulfilment and delivery.
- As necessary, to comply with a legal and regulatory obligations, which is commonly referred to as the “lawful basis”:
 - where you exercise your rights under data protection law and make requests;
 - to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;



- prevention and detection of terrorist offences and other serious forms of crime;
 - implementation of legislation (such as the GDPR);
 - tax and accounting obligations of Well'com;
 - transportation safety obligations;
 - obligations relating to the fight against health crises.
- As necessary, for our legitimate interests in providing the Services and ensuring we seek to preserve a proportionate balance between our legitimate interest and respect for your privacy and also insuring they operate safely, securely and in a commercially suitable way which is tailored to your use and interests, for the following purposes:
 - to provide you with the Services;
 - to improve our Services with you and our relationship with you;
 - to control the regularity of our operation and our Services;
 - to conduct market research on our products/services or to develop new products/services;
 - to analyse data, establish sales and sales activity reports, frequency of visits and establish marketing profiles;
 - to verify your identity for security purposes;
 - to help us to ensure our customers are genuine and to prevent fraud;
 - to ensure the security of our websites, mobile applications and other technology systems;
 - disclose any abuse that may or may seriously prejudice the financial status, results and/or reputation of Well'com;
 - for the good governance of our business, including keeping financial records, to allow us to pay suppliers and to charge, invoice or refund customers;
 - prevent and detect crime and to keep people who visit and work at Well'com safe and secure;
 - to record and investigate health and safety and other incidents which have happened or may have happened at Well'com;
 - to provide you with information about our Services, to contact you about administrative matters, and to manage and respond to any queries or complaints you make or any correspondence you send us;
 - to help us to return lost property to its rightful owner;
 - carrying out analyses in the context of mergers or takeovers;
 - exercise, defend and preserve our rights, for example during litigation, as well as to compile the proof of a possible violation of our rights.

Based on your explicit consent, for the following purposes we can use your data to send you marketing communications.

Based on your explicit consent, we can use your data when you provide us with personal data about your health "Special needs data", for the following purposes:



- to provide you with tailored services (for example, if you need a car special for a wheelchair or a sign language interpreter); and
- to help us investigate an incident which may have taken place during a Well'com Service

We need to collect some of your data to execute your contract. If you choose not to share this data with us, it may render the performance of the contract impossible.

Your data will only be shared with our partners when it is necessary.

We do not sell and will not at any point sell your personal data.

You have control of your data.

4. Sharing data with third-parties

We can share your personal data with other companies in Well'com Group.

We can share your personal data with the data processors that help us to provide the Services.

For example, In order to process payments and to prevent and detect fraudulent activity, we process payment card data through various payment and fraud management service providers.

Also, to provide you with special assistance in France, in European Economic Area (EEA). and also outside of EEA. To do so, we have to coordinate with the company services in the countries in which we operate. In that context, we act as joint data controller with the companies that provide the requested assistance.

Any data processors with whom we share your personal data are limited (by law and by contract) in their ability to use your personal data for any purpose other than to provide services for us.

We will always ensure that any data processors with whom we share your personal data are subject to privacy and security obligations consistent with this Privacy Policy and applicable laws.

We can also disclose your personal data to third parties in the following circumstances:

- if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets;



- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity;
- in order to enforce or apply Our Terms of Use or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity; or
- to protect the rights, property, or safety of us, our customers or other persons. This may include exchanging personal data with other organisations for the purposes of fraud protection and credit risk reduction.

Save as expressly detailed above in this section, we will never share, sell or rent any of your personal data to any third party without notifying you and/or obtaining your consent.

5. Sending data outside the European Economic Area (“EEA”)

Your personal data may be transferred to, and processed in a location outside of the European Economic Area (EEA).

In particular, your personal data may also be processed by staff operating in the United States or outside the EEA working for us, other members of Our Group or third-party data processors.

Such staff may be engaged in, among other things, the provision of our Services to you, the processing of transactions and/or the provision of support services.

Some countries outside the EEA do not have laws that protect your privacy rights as extensively as those in EEA or in France. However, if we do transfer your personal data to other territories, we will put in place appropriate safeguards to ensure that your personal data are properly protected and processed only in accordance with this Privacy Policy. Those safeguards include imposing contractual obligations of adequacy or requiring the recipient to subscribe to or be certified with an ‘international framework’ of protection. You can obtain more information about the safeguards we put in place by contacting us at privacy@wellcomairservices.com.

6. Retention period

Data is kept for the strict duration of the contract, as long as we have a valid reason to do so and then for the period required by various legal provisions. The exact period of time is determined by what we are using it for. Also legal requirements to retain data are set by



each jurisdiction we operate in and will depend on local laws and also depends on the purpose of the data retention.

7. Your rights as a data subject

Well'com determines the purposes and means of processing your personal data.

If you have any comments or questions about this Privacy Policy or our data processing practices, please address Well'com data protection officer at privacy@wellcomairservices.com or at the following address:

Data Protection Officer
WELL'COM GROUP
17 Rue du Colisée - 75008 PARIS – France

You may contact our Data Protection Officer at any time in order to:

- request that we provide you with a copy of the personal data which we hold about you;
- request that we update any of your personal data which are inaccurate or incomplete;
- request that we delete any of your personal data which we are holding;
- request that we restrict the way that we process your personal data;
- request that we provide your personal data to you or a third-party provider of services in a structured, commonly-used and machine-readable format;
- object to us processing personal data based on our legitimate interests, including profiling; or
- object to us processing your personal data for direct marketing purposes.

In order to reasonably assist us with locating your data, your request must include the following basic information:

- your full name;
- the email address associated with your request;
- a rough time frame of what period you are requesting your data from;
- any other information you may have to assist us searching for your data.

Please allow at least a calendar month for us to process your request.

When we process your data on the lawful basis of consent you are entitled to withdraw this at any time. Withdrawal of consent does not affect the legality of the processing of your data during the time when your consent was still active and valid. There may be circumstances whereby we are still entitled to process your data for overriding legal or regulatory purposes.



For direct marketing, which is processed on consent, the right to withdraw your consent is absolute and requires no further qualifications.

8. Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with the national data protection supervisory authority responsible for the protection of personal data in the country where you live or work, or in a country which you think a breach of data protection laws has taken place.

Customers in France can contact the Commission Nationale de l'Informatique et des Libertés by telephone on +33 (0)1 53 73 22 22 or by writing to the Commission at 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France.

9. How do we protect your personal data?

We use industry standard technical and organisational security measures to protect your personal data.

We keep your personal data secure by implementing policies, procedures and access controls so that only authorised members of our staff or authorised third parties can access your personal data.

We protect our information technology systems with firewalls and anti-virus and anti-malware software and other information security technology solutions.

We cannot guarantee the security of your personal data when you transmit it to us. For example, if you email us your personal data, you should be aware that email is not a secure transmission method. As such, you acknowledge and accept that we cannot guarantee the security of your personal data transmitted to us and that any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to prevent unauthorised access.

Where we have given you (or where you have chosen) a password which enables you to access one of our Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

10. Changes to our Privacy Policy

We reserve the right to change our Privacy Policy from time to time. Any such changes will be posted on this page so that we can keep you informed about how we process your personal data. We recommend that you consult this page frequently so that you are aware of our latest Privacy Policy and can update your preferences if necessary. Your continued use of our Services shall constitute your acceptance of any revised Privacy Policy.