

1. Purpose of the Data Protection Policy

This Data Protection Policy is intended to inform visitors to the **9Hotel Collection** website about how their personal data is collected, used and protected.

2. Role of 9Hotel Collection

As **data controller**, **9Hotel Collection**, a **SASU** company with its registered office at **8 Rue Bayen, 75017 Paris, registered with the Paris Trade and Companies Register under number 521 770 438**, determines the purposes and means of processing your personal data collected through this website.

3. Collection of Personal Data

Personal data may be collected:

- **Directly through forms:** for example, when subscribing to a newsletter, submitting a contact request or making a reservation.
- **Indirectly through cookies:** cookies make it possible to collect browsing data and display personalised advertising.

4. Purposes and Retention Periods for Personal Data

The table below summarises all processing activities for which **9Hotel Collection** may use your personal data.

Processing activity	Purposes	Legal basis/bases	Data concerned	Retention period
Website forms (contact)	Respond to your request and provide you with the requested information or services.	Consent: enabling us to respond to requests submitted to us.	Identity and contact details (surname, first name, email address, telephone number); data relating to the Hotel concerned by the request.	3 years from the last contact in the active database; and evidentiary archiving for 5 years.
Newsletter	Regularly send	Consent.	Email address,	Until consent is

Processing activity	Purposes	Legal basis/bases	Data concerned	Retention period
management and promotional offers	newsletters to subscribers and provide promotional offers.		surname, first name.	withdrawn and for a maximum of 3 years from the last contact.
Recruitment	Review and manage applications.	Pre-contractual measures; consent for retaining CVs in a CV database.	All information contained in the CV, including: identity and contact details; professional information; personal information.	3 months after the last contact, or up to 2 years with consent.
Organisation of events (lotteries, promotional operations, prize draws, etc.)	Management of events: sending invitations; monitoring registrations; monitoring satisfaction.	Legitimate interest: promoting and improving events and organising such events.	Identity and contact details; information relating to registration and participation in events.	3 years from the last contact in the active database; and evidentiary archiving for 5 years.
Cookies (for further information, please refer to the website Cookie Policy)	Ensure the operation and security of the website; obtain statistics; provide personalised advertising.	For functional cookies: legitimate interest in providing online content and ensuring the proper functioning and security of the website; optional cookies: consent.	Browsing data; information identifying the device used to browse the website.	Cookie lifespan: 13 months; data retention: maximum 25 months.
Management of data subject rights requests	Receive, respond to and document requests relating to data subject rights.	Legal obligation: GDPR.	Identity and contact details, copy of an identity document.	For the period necessary to process the request; and evidentiary archiving for 5

Processing activity	Purposes	Legal basis/bases	Data concerned	Retention period
Management of online reservations	Manage online reservations; process online payments.	Performance of a contract once the reservation has been made.	Identity and contact details (surname, first name, telephone number, email address, nationality); payment information (bank card number, expiry date, security code, name on the card).	years. Data retained until the end of the contractual relationship or for 3 years from the last login; and evidentiary archiving for 10 years for contracts concluded electronically with a value exceeding €120.
Browsing data	Develop, operate, improve, provide and manage the Website; prevent unlawful or illegal activity.	Legitimate interest: analysing user behaviour on the Website and improving the security and operation of the Website.	Connection data (times, pages viewed, IP address, etc.).	Maximum period of 12 months.

5. Recipients of Collected Personal Data

The personal data collected may be communicated to the following categories of recipients, in accordance with applicable regulations:

Within 9Hotel Collection (internal recipients)

Your Personal Data is processed by authorised members of **9Hotel Collection** staff.

Outside 9Hotel Collection (external recipients)

Several categories of third parties listed below may have access to your Personal Data. Only the Personal Data strictly necessary for their respective activities is transmitted to them.

- **IT service provider:** we use a service provider for hosting and maintaining the website: OVH.
- **Marketing and online reputation management service providers:** specialised agencies may be used for data analysis, including Traffic Makers and WHIP. Online reputation management is carried out by Shiji.
- **Cloud CMS provider:** MMCréation.
- **GDPR compliance provider:** Data Comply One.
- **Property management provider:** Mews.
- **Digital assistant provider:** Aleno.
- **CRM and electronic messaging tools:** your data may be stored in tools used for customer relationship management and sending communications, including Microsoft and LoungeUp.

With regard to Personal Data, we ensure that these processors contractually undertake to implement a level of protection equivalent to ours and compliant with applicable Regulations.

Specific cases involving data sharing

9Hotel Collection undertakes not to disclose your Personal Data to service providers unless:

1. You have given your prior consent to the sharing of your Personal Data with such service providers;
2. Sharing your Personal Data with such service providers is necessary for the provision of the products or services requested;
3. A competent judicial or administrative authority requires that the Data be disclosed.

6. Transfers Outside the EU

We endeavour to retain your Personal Data within the European Union. However, some services we use may involve potential transfers outside the EU.

With due regard for the security and confidentiality of your Data, we inform you that where your Data is transferred outside the EU, we ensure that the transfer is made:

- Either to a country recognised by the European Commission as providing an adequate level of protection;

- Or to a country that does not provide an adequate level of protection but where the transfer is otherwise permitted, in particular where it is governed by the European Commission's Standard Contractual Clauses, which provide sufficient safeguards for privacy and the fundamental rights of individuals.

7. Your Rights Regarding Your Data

a) Right of access

You may request and obtain information about the personal data we hold about you.

b) Right to rectification

You have the right to request the correction of inaccurate or incomplete personal data concerning you.

c) Right to erasure

Also referred to as the “right to be forgotten”, this right allows you to request the deletion of your personal data unless the data must be retained:

- To comply with a legal obligation;
- For the establishment, exercise or defence of legal claims.

d) Right to restriction of processing

This right allows you to request that the use of your personal data be restricted in certain circumstances:

- You have requested the rectification of your data, in which case processing may be restricted for the time required to carry out the necessary checks;
- The processing is unlawful and you object to the deletion of your data;
- The data controller no longer needs your data, but you require it for the establishment, exercise or defence of legal claims;
- You have objected to the processing and we are verifying whether our legitimate grounds override your own grounds.

e) Right to data portability

You may receive your personal data in a structured, machine-readable format so that you can transfer it to another organisation.

f) Right to object

You have the right to object to the processing of your personal data on legitimate grounds, unless there are compelling legitimate grounds for continuing the processing.

Several processing activities involving your personal data are subject to your consent. You may withdraw your consent at any time.

g) Right to lodge a complaint with the CNIL

You also have the right to lodge a complaint with the CNIL, the French supervisory authority (www.cnil.fr).

8. How to Exercise Your Rights

You may submit your requests using the following methods:

- **Postal address: 9Hotel Collection, SASU, registered office at 8 Rue Bayen, 75017 Paris**
- **Email address:**

<https://login.datacomplyone.app/moovapps/easysite/workplace/demande-droit?token=WHpsSWIzUmxiRU52Ykd4bFkzUnBiMjVHY21GdVkyVT0%3D&lg=fr>

9Hotel Collection has one month from receipt of your request to respond. This period may be extended by a further two months depending on the complexity of your request and the number of requests received. In such cases, you will be informed accordingly.

9. Data Protection Officer

The Data Protection Officer is SAS Mission RGPD (Data Comply One), whose registered office is located at 12 Rue de la Part-Dieu, 69003 Lyon, France.

Contact: dcodpo@datacomplyone.com

Telephone: +33 (0)4 28 70 91 81.

10. Changes to This Policy

This Data Protection Policy may be updated from time to time.

Date of last update: **09/03/2026**