



PERSONAL DATA PROTECTION POLICY

Updated on March 19, 2025

As part of the operation of the website <https://bbhotels-group.com/fr> (hereinafter referred to as "the Site"), Casper BidCo collects and processes personal data of the Site's users (hereinafter referred to as "Users").

The primary objective of this data protection policy is to inform you, in accordance with Regulation (EU) 2016/679 of the European Parliament and the Council of April 27, 2016, on the protection of natural persons regarding the processing of personal data and the free movement of such data (hereinafter referred to as the "Regulation" or "GDPR"), about how your personal information may be collected and processed through the Site, particularly in connection with your navigation and use of the services offered.

Protecting your personal data is a priority for Casper BidCo, which is committed to processing it in strict compliance with data protection regulations.

1. Data Controllers for Users' Personal Data

Casper BidCo, a simplified joint-stock company with a capital of €12,129,635.92, registered with the Nanterre Trade and Companies Register under number 850 790 908, with its registered office at 29 Boulevard Romain Rolland, 92120 Montrouge, is responsible for processing data collected via the Site.

For business partnership inquiries, Casper BidCo is a joint controller of personal data alongside the companies within the B&B HOTELS Group ([list of companies here](#)).

As joint controllers, Casper BidCo and the companies in the B&B HOTELS Group have entered into a joint responsibility agreement in accordance with Article 26 of the GDPR.

The jointly implemented processing purposes include:

- Managing partnership requests submitted via the forms available on the Site.
- Handling Users' requests to exercise their rights.

Users may exercise their rights with either of the data controllers, who will ensure efficient and timely processing of requests.

The joint controllers commit to implementing appropriate technical and organizational measures to ensure a level of security appropriate to the risk associated with data processing.

Casper BidCo and the B&B HOTELS Group companies are jointly responsible for processing the collected data.

2. Fair and Transparent Collection of Users' Personal Data

Any data collection during visits to the Site is accompanied by clear and transparent information provided to Users at the time of data collection.

All data is processed in compliance with the French National Commission on Informatics and Liberty (CNIL) guidelines for commercial activity data processing.

No data is collected without the Users' knowledge or prior information.

3. Legitimate and Proportional Use of Users' Personal Data

Each data processing operation has a legitimate, specific, and explicit purpose.

Casper BidCo and B&B HOTELS Group companies commit to collecting and using only necessary, relevant, and proportionate data for the specified purposes.

They also ensure data accuracy, updates, and effective procedures for rectification or deletion of incorrect data.

4. Data Subject to Processing

Users may transmit personal data when using the Site. This data is processed per applicable regulations.

The collected and processed personal data categories include:

- **Identity Information:** Title, surname, given name(s).
- **Contact Information:** Postal address, phone number, email address.
- **Professional Information:** Employer, location.
- **Educational Information:** Degrees obtained, attended universities or schools.
- **Request-related Information:** Messages entered in free-text fields

Casper BidCo may also collect passive or automatic data such as:

- **Technical, connection, navigation, and location data**, including:
Connection data (number and dates of Site visits).
- Navigation data collected via cookies and other trackers, Operating system type, web browser used, IP address, installed programs' name and version,
- Geolocation information.

5. Purposes and Legal Bases for Data Processing

Each data processing operation is based on:

- Contract execution,
- Legal or regulatory obligations,
- User consent,
- The legitimate interest of the data controller.

Processing Purpose

Managing business partnership requests

Handling User rights requests

Proper functioning and continuous improvement of the Site

Legal Basis

Pre-contractual measures at the User's request

Compliance with legal obligations (Articles 15-18 GDPR)

Legitimate interest of the data controller

6. Data Retention Period

Data is stored only for the duration necessary to fulfill processing purposes:

Processing Purpose

Business partnership requests

User rights requests

Site functionality and improvements (Cookies)

Retention Period

Duration of the partnership. If rejected, data is stored for the time required to process the request + 2 months.

Retained until the request is fully processed. Then archived for: 6 years (opposition requests) or 1 year (access, rectification, deletion, limitation, portability requests).

6 months from the first deposit.

7. Data Recipients

Authorized personnel from:

- B&B HOTELS Group companies,
- Subcontractors and service providers,
- Competent public authorities (if applicable),

- Third parties placing cookies on Users' devices (with consent).

8. Data Transfers Outside the European Union

Site data is stored by Datacampus (35 Rue du Grand Puit, 79230 Vouillé, France).

If data is transferred outside the EU to a country lacking an equivalent level of data protection, Casper BidCo and B&B HOTELS Group will implement appropriate safeguards (e.g., standard contractual clauses defined by the European Commission).

For more details, contact: privacy@bbhotels-group.com.

9. Data Security

Casper BidCo and B&B HOTELS Group prioritize data security by implementing technical and organizational measures to protect data from unauthorized access, loss, alteration, or disclosure.

However, Users are encouraged to adopt good security practices to help maintain confidentiality.

10. Subcontracting

Casper BidCo and B&B HOTELS Group ensure that any subcontractor handling personal data complies with data security and confidentiality standards, as outlined in Article 28 of the GDPR.

11. Users' Rights

Users have the following rights under GDPR Articles 15-18:

Right	Contract-Based Data	Legal Obligation-Based Data	Legitimate Interest-Based Data
Access	Yes	Yes	Yes
Rectification	Yes	Yes	Yes
Deletion	Yes	No	Yes
Processing Limitation	Yes	Yes	Yes
Data Portability	Yes	No	No
Opposition	No	No	Yes

Requests can be made via:

- Email: privacy@bbhotels-group.com
- Mail: 29 Boulevard Romain Rolland, 92120 Montrouge, France (with proof of identity).

Users may also file complaints with CNIL: <https://www.cnil.fr/fr/plaintes>.

12. Policy Updates

This policy may be updated based on changes to Site services. Users are advised to review it regularly.