

1. IDENTIFICATION

- Identity: NOYAN GOLF & TRAVEL 'SAS Omyler' (hereinafter "NOYAN GOLF & TRAVEL")
- National registration number: Siret 790 498 653 00019
- Tour Operator Licence : IM075130018
- Address: 13 rue Verniquet 75017 Paris / FRANCE
- Data Protection Officer (DPO): you may contact our DPO by the following:
 - E-mail: info@noyangolf.com
 - Telephone: [+33 9 72 52 31 42](tel:+33972523142)
 - Please state the reference "Data Protection Officer"

2. INFORMATION AND CONSENT

By accepting this Privacy Policy, the user is informed and provides their free, informed, specific and unambiguous consent for the personal data they provide on the website at www.noyangolf.com (hereinafter the "Website") to be processed by NOYAN GOLF & TRAVEL, with their browsing data and any other data they provide to **NOYAN GOLF & TRAVEL** in the future.

The user must read this Privacy Policy carefully, which has been written clearly and simply, to improve understanding, to freely and voluntarily decide whether they wish to provide their personal data to **NOYAN GOLF & TRAVEL**.

3. REQUIREMENT TO PROVIDE DATA

Data requested in Website forms are generally mandatory (unless otherwise specified in the requested field) to comply with the stated purposes.

Therefore, if these are not provided or not provided correctly, they may not be addressed, without affecting the free display of the Website content.

4. FOR WHAT PURPOSE WILL NOYAN GOLF & TRAVEL PROCESS USERS' PERSONAL DATA?

The personal data provided through the Website will be processed by **NOYAN GOLF & TRAVEL** for the following purposes:

1. Data provided for making reservations, both through the website and the contact center (call center, email or chat) for individual, group and room bookings:

- Managing booking requests made by users.
- Sending the confirmation or documentation for the booking made.
- If consent has been given, sending commercial communications on behalf of **NOYAN GOLF & TRAVEL**
- Analyzing the use of the Website and checking user preferences and behavior.

2. Data provided to contact form with **NOYAN GOLF & TRAVEL**

- Managing your request to register or deregister within the category chosen by the user.
- Checking that the user meets the requirements for registering within the selected category, whenever **NOYAN GOLF & TRAVEL** deems it appropriate.
- Handling and responding to potential requests for information made by the user.
- Searching for promotions that fit the needs selected by the user.
- Sending customized commercial communications on behalf of **NOYAN GOLF & TRAVEL**.
- Analyzing the use of the Website and checking user preferences and behavior.

3. Data provided for publications on **BLOGs** belonging to **NOYAN GOLF & TRAVEL**:

- Managing the publication of comments on the Website.
- Managing the subscription and/or unsubscription to the Blog Newsletter at the user's request.
- Analyzing the use of the Website and checking user preferences and behavior.
- If required, monitoring the content of users' comments and, where appropriate, deleting those whose content does not meet the conditions of the current Website at the discretion of **NOYAN GOLF & TRAVEL**.

4. Data provided for changing or cancelling reservations:

- Managing the requests to change or cancel your reservation made to **NOYAN GOLF & TRAVEL** by the user.
- Responding to requests made to **NOYAN GOLF & TRAVEL**.
- Analyzing the use of the Website and checking user preferences and behavior.

5. Data provided for **sending out Newsletter**:

- Managing subscription and/or unsubscription to the Newsletter, made through the channel provided on the **NOYAN GOLF & TRAVEL** Website

6. Data provided on **Corporate contact forms and website**:

- Managing contact and information requests by the user through the channels provided for this on the **NOYAN GOLF & TRAVEL** websites.
- Managing the request made.
- Analyzing the use of the Website and checking user preferences and behavior.

7. Data provided on the **contact** form:

- Sending a reminder of users' incomplete reservations or, if applicable, searches made by users.
- Analyzing the use of the Website and checking user preferences and behavior.

5. WHAT USER DATA WILL NOYAN GOLF & TRAVEL PROCESS?

NOYAN GOLF & TRAVEL will process the following categories of user data:

1. Data provided for making reservations, both through the website and the contact center (call center, email or chat) for individual, group and room bookings:

- Identifying data: name, surname, nationality.
- Contact details: email address, telephone number.
- Transactional data for goods and services with NOYAN GOLF & TRAVEL: Products and services purchased or in which you show interest.
- Stay preferences.
- Economic, financial and insurance data.
- Other data: data provided by the data subjects in open fields or during calls.
- Browsing data.

2. Data provided to Newsletter Form with NOYAN GOLF & TRAVEL:

- Identifying data: name, surname, address, nationality
- Contact details: email address, telephone number.
- Identification codes and keys for the user and/or member.
- Details employment data: profession, sector.

3. Data provided through the Request form:

- Identifying data: name, surname.
- Contact details: email address, telephone number.
- Transactional data for goods and services.
- Other data: data provided by the data subjects in open fields on forms available on the Website or in the attached documents.
- Browsing data.

4. Data provided for publications on **BLOGs belonging to NOYAN GOLF & TRAVEL**

- Identifying data: name, surname.
- Contact details: country of residence, email address.
- Browsing data.

5. Data provided for **changing or cancelling reservations**:

- Identifying data: name, surname.
- Contact details: email address, telephone number.
- Transactional data for goods and services.
- Economic, financial and insurance data.
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- Other data: data provided by the data subjects in open fields on forms available on the Website or in the attached documents.
- Browsing data.

6. Data provided for **sending out Newsletter**:

- Identifying data: name, surname.
- Contact details: country of residence, email address.
- Data on personal characteristics: language.

7. Data provided on **Corporate contact forms and websites**:

- Identifying data: name, surname.
- Contact details: email address, telephone number.
- Transactional data for goods and services.
- Other data: data provided by the data subjects in open fields on forms available on the Website or in the attached documents.
- Browsing data.

8. Data provided on the **contact** form:

- Contact details: address and email.

If the user provides data on third parties, they declare that they have their consent and commit to providing them with the information in the Privacy Policy, thereby exempting NOYAN GOLF & TRAVEL of any liability in this regard. However, NOYAN GOLF & TRAVEL may make periodic checks to confirm this, using appropriate due diligence, in accordance with data protection regulations.

6. WHAT IS THE JUSTIFICATION FOR PROCESSING USERS' DATA?

The justification for processing your personal data will be as follows:

1. For **making reservations, both through the website and the contact centre (call centre, email or chat) for individual, group and room bookings**: performance of the contract between the parties. For analyzing the use of the Website, the legitimate interest of **NOYAN GOLF & TRAVEL**
2. For managing **newsletter form**: the consent requested and, in verification, users' compliance with terms and conditions, and for analyzing the use of the Website, the legitimate interest of **NOYAN GOLF & TRAVEL**. However, if you withdraw your consent, this will not affect the legality of prior processing.
3. For the **Request** form: the consent requested from you which you may withdraw at any time. However, if you withdraw your consent, this will not affect the legality of prior processing. For analyzing the use of the Website, the legitimate interest of **NOYAN GOLF & TRAVEL**
4. For managing and publishing comments or publications sent by users on **BLOGs belonging to NOYAN GOLF & TRAVEL**: the consent given by the user and, in Website analysis, confirming user preferences and behavior, and in monitoring the content of the comments, the legitimate interest of **NOYAN GOLF & TRAVEL**. If you withdraw your consent for processing in the publication of comments, these will be deleted from the Website by **NOYAN GOLF & TRAVEL**.
5. For **changes and/or cancellation of your reservation**: the performance of the contract between the parties. For analyzing the use of the Website, the legitimate interest of **NOYAN GOLF & TRAVEL**.
6. For **sending the Newsletter**: the consent provided by the user.
7. For sending **Corporate contact forms and website**: the consent provided by the user. For analyzing the use of the Website, the legitimate interest of **NOYAN GOLF & TRAVEL**.
8. For sending the **contact** reminder: the consent provided by the user. For analyzing the use of the Website, the legitimate interest of **NOYAN GOLF & TRAVEL**.

Consents obtained for the aforementioned purposes are separate and the user may revoke only one without affecting the others.

To revoke this consent, the User may contact NOYAN GOLF & TRAVEL by the following methods: info@noyanguolf.com

7. WITH WHICH RECIPIENTS WILL USER DATA BE SHARED?

User data may be disclosed to:

1. Data provided for **making reservations, both through the website and the contact center (call center, email or chat) for individual, group and room bookings:**
 - Companies belonging to or affiliated with NOYAN GOLF & TRAVEL which require access to your data for correct provision of the chosen services. Some of these entities may be located outside the European Economic Area, including in countries that do not offer a level of protection comparable to the level in France. The sole purpose of this communication will be to be able to provide the services to you correctly.
2. Data provided to **newsletter form** with **NOYAN GOLF & TRAVEL** :
 - Companies within the group to which NOYAN GOLF & TRAVEL belongs, solely for internal administrative purposes and/or for the purposes indicated above.
3. Data provided through the **Request** form:
 - Companies within the group to which NOYAN GOLF & TRAVEL belongs, solely for internal administrative purposes and/or for the purposes indicated above.
4. Data provided for publications on **BLOGs belonging to NOYAN GOLF & TRAVEL** :
 - Data provided by users will be published on the Website, and will be accessible to any user accessing the same.
5. Data provided for **changing or cancelling reservations:**
 - Companies belonging to or affiliated with NOYAN GOLF & TRAVEL, all within the hotel sector, which require access to your data for correct provision of the chosen services. In addition, your data will be disclosed to hotel owners, so that they are aware of the conditions of your stay (price, dates, services included, ...), and any of these may be located outside the European Economic Area, including in countries which do not offer an equivalent level of protection to Spain for the sole purpose of correct service provision.
6. Data provided for **sending out the Newsletter** will not be disclosed to third party companies.
7. Data provided on **Corporate contact forms and website:**
 - Companies within the group to which NOYAN GOLF & TRAVEL belongs, solely for internal administrative purposes and/or for the purposes indicated above.
8. Data provided on the **contact** form:
 - Companies within the group to which NOYAN GOLF & TRAVEL belongs, solely for internal administrative purposes and/or for the purposes indicated above

In addition, data may be accessed by **NOYAN GOLF & TRAVEL** suppliers, when this is required for proper compliance with legal obligations and/or for the purposes indicated above. These providers will not process your data for purposes not previously advised by **NOYAN GOLF & TRAVEL**.

8. INTERNATIONAL TRANSFERS OF DATA

Please be advised that your data will be transferred to third parties located outside the European Economic Area. It will be transferred as a result of the services provided to NOYAN GOLF & TRAVEL in terms of the back office management connected to the company's invoicing. In this regard, please be advised that the company is regulated by means of contractual clauses approved in advance by the AEPD.

9. DATA STORAGE

Your data will be stored for the following periods:

1. Data provided for making reservations, both through the website and the contact centre (call centre, email or chat) for individual, group and room bookings: will be stored throughout the contractual relationship, and after termination of the same, for the limitation period for legal actions that could result from it.
2. Data provided to contact form with NOYAN GOLF & TRAVEL: for as long as the user does not withdraw the consent provided. However, if you withdraw your consent, this will not affect the legality of prior processing.
3. Data provided through the Request form: for as long as required to manage your request.
4. Data provided for publications on BLOGs belonging to NOYAN GOLF & TRAVEL : Data will be stored for as long as the user does not withdraw the consent given.
5. Data provided for changing or cancelling reservations: will be stored throughout the contractual relationship, and after termination of the same, for the limitation period for legal actions that could result from it.
6. Data provided for sending out Newsletter: will be stored for as long as the user does not withdraw the consent provided for this.
7. Data provided on Corporate contact forms and website: will be stored for the period required to process and answer your request and, when this is complete, for the limitation period for legal actions resulting from this request.
8. Data provided on the contact form form: will be stored for 15 days after abandoning the reservation.

10. USER LIABILITY

The user:

- Guarantees that they are above eighteen (18) years of age and that the data they provide to **NOYAN GOLF & TRAVEL** and true, precise, complete and up to date. For these purposes, the user is liable for the veracity of all the data disclosed and must keep the information provided properly up to date, to reflect their actual situation.
- They guarantee that they have informed the third parties whose data they have provided, if they have done so, of the points covered in this document. In addition, they guarantee that their authorization has been obtained to provide their data to **NOYAN GOLF & TRAVEL** for the indicated purposes.
- They will be liable for any false or inaccurate information they provide on the Website and for direct or indirect damage caused to **NOYAN GOLF & TRAVEL** or to third parties.

11. EXERCISE OF RIGHTS

Users may write to **NOYAN GOLF & TRAVEL**, at the address noted at the top of this Policy, or by email to info@noyangolf.com, including a copy of their identity document, at any time and free of charge, to:

- Revoke consent already granted.
- Receive confirmation on whether or not **NOYAN GOLF & TRAVEL** is processing personal data belonging to the user.
- Access your personal data.
- Correct inaccurate or incomplete data.
- Request the deletion of your personal data when, for any reason, the data is no longer necessary for the purposed for which it was obtained.
- Request that **NOYAN GOLF & TRAVEL** restrict data processing when any of the conditions in the data protection regulations are met.
- Request the portability of the data provided by the User in cases envisaged in the regulations.
- Contact the DPO of **NOYAN GOLF & TRAVEL** at the following address: info@noyangolf.com
- Lodge a complaint relating to protection of your personal data with the French Data Protection Agency CNIL (Commission Nationale de l'Informatique et des Libertés), when the data subject believes that **NOYAN GOLF & TRAVEL** has infringed the rights recognized by applicable data protection regulations.

12. SECURITY MEASURES

NOYAN GOLF & TRAVEL will process user data absolutely confidentially at all times, under the duty of secrecy of the same, in accordance with applicable regulations, taking necessary technical and organizational measures to guarantee the security of your data and prevent unauthorized changes, loss, processing or access, in view of the state of technology, the nature of the data stored and risks to which they are exposed.

13. COOKIES

- Cookies are small pieces of information that are stored on and retrieved from your computer by websites for record-keeping purposes. The use of cookies is an industry standard and you will find them in use at most major websites.
- We use cookies to track traffic from our affiliates.
- Most computers are set up to automatically accept cookies. However, you can reset your browser settings to refuse cookies, or alert you when a cookie is being sent so you can choose whether or not to accept it.
- Unfortunately, if you choose to refuse our cookies, some parts of our service may be slower or not function properly.
- We use Remarketing with Google Analytics to advertise online.
- Third-party vendors, including Google, show our ads on sites across the Internet.
- We and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on your past visits to our website.

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