

Privacy Policy

1. What's the point of this policy?

1. As part of the services offered by Groupe Lucien Barrière, and in particular accessing, consulting, browsing and using the www.groupebarriere.com website and the services it offers, you may be asked to provide Groupe Lucien Barrière with personal information about yourself.
2. Groupe Lucien Barrière processes your personal data in accordance with applicable data protection regulations, and in particular in accordance with the General Data Protection Regulation (GDPR).
3. The purpose of this policy is to provide you with information about the processing of your personal data by Groupe Lucien Barrière.
4. Please read the following carefully to understand our policy and practices regarding your personal data and how we process it. This policy supplements any documents or information referring to the policy.

2. Who processes your data?

5. The data controller is Groupe Lucien Barrière. In this capacity, Groupe Lucien Barrière determines the purposes of the processing carried out on its website and the manner in which your data is processed.
6. If you have any questions, please send an e-mail to dpo@groupebarriere.com or a letter to the following address :

Société Anonyme Groupe Lucien Barrière
33 rue d'Artois
75008
Paris

3. What personal data may be processed?

7. Groupe Lucien Barrière collects and processes the following categories of personal data:

Categories of data	Data details
Identification data	• Title (e.g., Mr., Ms.). • Last name, first name (birth name, maiden name/name in use, and communication name). • Photos. • Language. • Children's first and last names in the context of bookings at Barrière Group hotels. • Phone number. • Gender. • Age. • Date of birth. • Place of birth. • Postal address (country, city, and postal/zip code). • Email address. • Phone number. • Copy of ID card or passport. • ID card expiration date. • Nationality. • Signature. • License plate number (in the context of parking space reservations at Barrière Group hotels).
Personal and professional data	• Marital status. • Affinity data (centers of interest). • Customer's profession.
Economic and financial data	• Banking details (Bank Account Details/IBAN). • Encrypted credit card number. • Cardholder name. • Credit card expiration date. • Credit card security code (CVV/CVC). • Transaction number. • Casino payment "wallet" balance. • History of casino transactions performed via the payment "wallet."
Data related to Groupe Barrière casinos	• ID number. • « Le Carré VIP / Barrière Play » program status. • Home casino (primary location). • Casino visited and date of visit. • « Le Carré VIP / Barrière Play » card creation date. • Restriction status (e.g., Voluntary Gambling Ban/LVA, ANPR). • Gaming activity. • Winnings and wagers (or bets). • Transaction history. • Results of participation in contests organized in Barrière Group casinos. • Lucky date. • Gaming preferences and habits. • Spouse information (first name, last name, spouse ID). • Satisfaction and reviews.

Categories of data	Data details
Data related to Groupe Barrière hotels	• Booking history. • Infiniment Barrière loyalty Program status. • Loyalty program number. • Arrival and departure dates (Check-in/Check-out). • Number of guests included in the reservation. • Selected booking options. • Stay preferences and habits. • Satisfaction and reviews.
Data related to Barrière Group restaurants	• Booking history. • Preferences. • Satisfaction and reviews.
Data related to "well-being" services	• Booking history. • Preferences. • Satisfaction and reviews.
Technical data	• Connection data (number and dates of logins to account, website, or application). • Segmentation of pseudonymized data for internal statistical survey purposes. • Browsing data collected during your visit to our website through cookies and other trackers.

4. Why is your data collected?

8. Groupe Lucien Barrière may collect data from site users for the following purposes:

Purposes	Details	Legal basis
Casino and entertainment (show)		
Management of the Casino loyalty program (« Le Carré VIP / Barrière Play »)	• Management of the « Le Carré VIP / Barrière Play » loyalty programme. • Management of your loyalty programme membership. • Creation of your « Le Carré VIP / Barrière Play » loyalty card. • Creation of your loyalty account. • Awarding and management of points and benefits linked to the loyalty programme. • Creation of a customer profile for service personalisation.	Performance of the contract between program members and Groupe Lucien Barrière.
Direct marketing	• Personalised "casino" offers and communications.	Consent of the data subjects.
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Purposes	Details	Legal basis
Organization and management of contest	Organization of contests in Groupe Barrière casinos.	Performance of the contract concluded with participants.
Digitalisation of casino payments	Management of contactless payment in Groupe Barrière casinos.	Execution of the contract concluded between customers and Groupe Lucien Barrière.
Entertainment (shows)	- Creation of a customer account. - Ticketing management and commercialisation of shows organised within Barrière Group casinos	Performance of the contract concluded between Groupe Lucien Barrière and clients who purchased their tickets.
Hotel activities		
Management of hotel bookings	- Management of check-in formalities and client reception. - - Management of the end of the booking. - Creation of a customer profile for service personalisation.	Performance of the contract concluded between Groupe Lucien Barrière and hotel guests.
Direct marketing	Personalised "hotel" offers and communications following a stay booking.	Legitimate interests of Groupe Lucien Barrière.
	Personalised "hotel" offers, invitations and communications following registration with the loyalty programme or newsletter.	Consent of the data subjects.
Management of the "Infiniment Barrière" loyalty program	- Management of your loyalty programme membership. - Creation of your Infiniment Barrière account. - Awarding your loyalty programme benefits. - Management of your loyalty programme benefits.	Performance of the contract between Infiniment Barrière loyalty program members and Groupe Lucien Barrière.
Management of online reservations for "well-being" services	- Management of online booking for "well-being" services. - Creation of a customer account."	Performance of the contract concluded between Groupe Lucien Barrière and customers of a "well-being" service.
Direct marketing	"Wellness" offers.	Consent of the data subjects.

Purposes	Details	Legal basis
Wellness activities		
Management of online bookings for "wellness" services	• Management of online bookings for "wellness" services. • Creation of a customer account.	Performance of the contract concluded between Groupe Lucien Barrière and clients of a "wellness" service.
Direct marketing	• Personalised "wellness" offers and communications.	Consent of the data subjects.
Restaurant activities		
Management of bookings and services offered in restaurants	• Management of your booking.	Execution of the contract concluded between Groupe Lucien Barrière and customers who have booked at a restaurant.
Customer relationship management	• Creation of a customer profile for service personalisation. • Satisfaction management. • Online reputation management (customer reviews).	Legitimate interest of Groupe Lucien Barrière.
Direct marketing	• Personalised "restaurant" offers and communications.	Consent of the data subjects.
Event organisation		
Management of client requests in the context of event organisation	• Management of requests.	Execution of pre-contractual measures concluded between customers wishing to organise events and Groupe Lucien Barrière.
Customer relations and statistics		
Management of the relationship between Groupe Lucien Barrière and its clients	• Responding to your questions, requests for information and complaints.	Execution of the contract concluded between Groupe Lucien Barrière and customers.

Purposes	Details	Legal basis
	- Management of satisfaction surveys and campaigns. - Online reputation management (customer reviews).	Legitimate interests of Groupe Lucien Barrière.
Conducting statistical analyses and studies	- Segmentation of aggregated and pseudonymised data for the purpose of conducting internal statistical surveys to measure visitor numbers, client knowledge and analysis of the performance of the Group's operations and commercial and marketing activities. - Ensuring asset security and fraud prevention.	Legitimate interests of Groupe Lucien Barrière.

9. In order to offer you personalised services and offers tailored to your needs, Groupe Lucien Barrière may carry out profiling operations. This processing involves analysing your preferences, habits and areas of interest.

5. How long do we keep your personal data?

10. We will retain your personal data in accordance with a retention policy set so that data is retained for a period proportionate to the purpose for which it was collected, except where laws and regulations require a different retention period.
11. Accordingly, we organize our data retention policy as follows:

Purposes	Personal data retention period	
	Active database	Intermediate archiving
Management of the Casino loyalty programme (« Le Carré VIP / Barrière Play »)	3 years from the date of the last activity of the data subjects.	No intermediate archiving.
Direct marketing (casinos, entertainment, hotel, restaurant, "wellness", and event operations)	3 years from the last contact from the data subjects.	No intermediate archiving.
Organization and management of contests.	Duration of the gaming period plus 6 months to 1 year depending on the game.	No intermediate archiving.

Digitalisation of casino payments	Duration of the contractual relationship.	To enable Groupe Lucien Barrière to fulfil its legal obligations in accounting matters: 10 years from the close of the financial year. To enable Groupe Lucien Barrière to fulfil its legal obligations in tax matters: 6 years.
Show management	- Duration of the contractual relationship. 3 years from the booking.	To enable Groupe Lucien Barrière to fulfil its legal obligations in accounting matters: 10 years from the close of the financial year. To enable Groupe Lucien Barrière to fulfil its legal obligations in tax matters: 6 years.
Management of hotel bookings	- Duration of the contractual relationship for data necessary for the booking. 5 years from the end of the stay.	To enable Groupe Lucien Barrière to fulfil its legal obligations in accounting matters: 10 years from the close of the financial year. To enable Groupe Lucien Barrière to fulfil its legal obligations in tax matters: 6 years.
Management of the Infiniment Barrière loyalty programme	3 years from the date of the last activity of the data subjects.	No intermediate archiving.

Management of online bookings for "wellness" services	- Duration of the contractual relationship corresponding to the "wellness" service contract. - Anonymisation after a period of 5 years following a booking. - Anonymisation after a period of 3 years for prospects.	To enable Groupe Lucien Barrière to fulfil its legal obligations in accounting matters: 10 years from the close of the financial year. To enable Groupe Lucien Barrière to fulfil its legal obligations in tax matters: 6 years.
Management of bookings and customer relations for restaurants	- Duration of the contractual relationship. 3 years from the booking.	To enable Groupe Lucien Barrière to fulfil its legal obligations in accounting matters: 10 years from the close of the financial year. To enable Groupe Lucien Barrière to fulfil its legal obligations in tax matters: 6 years.
Management of client requests in the context of event organisation	- Duration of the contractual relationship. 5 years from the last contact from the data subjects.	To enable Groupe Lucien Barrière to fulfil its legal obligations in accounting matters: 10 years from the close of the financial year. To enable Groupe Lucien Barrière to fulfil its legal obligations in tax matters: 6 years.
Management of the relationship between Groupe Lucien Barrière and its clients	<i>For satisfaction management and online reputation management:</i> Duration necessary to achieve the survey objective, i.e. 1 year from collection.	No intermediate archiving.
Conducting statistical analyses and studies	Data processed for the purpose of internal statistical surveys, client knowledge and analysis of the Group's commercial and marketing operations and activities: 3 years from your last contact for Casino activity and 5 years from your last contact for Hotel activity.	No intermediate archiving.

	• Data processed for visitor number measurement purposes is retained for 13 months; raw data is deleted immediately after pseudonymisation. • Data processed for asset security and fraud prevention purposes is retained for a period of one year from collection.	
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12. We draw your attention to the fact that in the event **of pre-litigation or litigation** between you and Groupe Lucien Barrière, your personal data will be retained until the amicable settlement of the dispute or, failing that, until the legal limitation period for the corresponding legal action has expired (5 years in civil and commercial matters).

6. With whom do we share your personal data?

13. We share your personal data with persons who are strictly authorized to do so by virtue of their functions within Groupe Lucien Barrière.
14. Your data will also be sent to third parties of the Lucien Barrière Group, listed in the following table:

Categories of recipients	Purposes
Groupe Barrière Casinos	
Software publishers (for casino operations management)	• Management of « Le Carré VIP / Barrière Play » loyalty program. • Customer relationship management • Organization and management of contests.
Identity verification service provider	• Management of « Le Carré VIP / Barrière Play » loyalty program. • Digitalisation of casino payments.
Show Booking Service Providers	• Sales of shows. • Order management.
Email software publishers	• Direct marketing (« Casino » and « Entertainment » offers).
Payment service providers	• Digitalisation of casino payments (wallet). • Management and security of payment transactions.

Categories of recipients	Purposes
Customer relationship tracking and statistics tools	Management of the relationship between Groupe Lucien Barrière and its clients. Conducting statistical analyses and studies. Conducting customer satisfaction surveys.
Groupe Barrière hotels	
Software publishers (for the management of hotel activities)	• Management of hotel bookings. • Customer relationship management. • Management of the Infiniment Barrière loyalty programme.
Online booking platform publishers	• Management of hotel bookings.
Email software publishers	• Direct marketing (« hotel » offers).
Payment service providers	• Management and security of payment transactions.
Customer relationship tracking and statistics tools	• Management of the relationship between Groupe Lucien Barrière and its clients. • Conducting statistical analyses and studies. • Conducting customer satisfaction surveys.
"Wellness" activities	
Software publishers (for managing hotel wellness services)	• Management of "wellness" services bookings. • Customer relationship management.
Online booking platform publishers	• Management of online bookings for "wellness" services.
Email software publishers	• Direct marketing (« wellness » offers).
Payment service providers	• Management and security of payment transactions.
Customer relationship tracking and statistics tools	• Management of the relationship between Groupe Lucien Barrière and its clients. • Conducting statistical analyses and studies. • Conducting customer satisfaction surveys.
Event organisation	

Categories of recipients	Purposes
Software publishers (for management of client requests in the context of event organisation)	• Management of bookings and service offered. • Customer relationship management.
Email software publishers	• Direct marketing.
Payment service providers	• Management and security of payment transactions.
Customer relationship tracking and statistics tools	• Management of the relationship between Groupe Lucien Barrière and its clients. • Conducting statistical analyses and studies. • Conducting customer satisfaction surveys.
Barrière Group Restaurants	
Software publishers (for restaurant management)	• Management of restaurant bookings and services. • Customer relationship management
Online booking platform publishers	• Management of restaurant bookings.
Email software publishers (for restaurants)	• Direct marketing (« restaurant » offers).
Payment service providers	• Management and security of payment transactions.
Customer relationship tracking and statistics tools	• Management of the relationship between Groupe Lucien Barrière and its clients. • Conducting statistical analyses and studies. • Conducting customer satisfaction surveys.

15. When we use a service provider, we only communicate your personal data to them after having obtained from them a commitment and guarantees regarding their ability to meet these security and confidentiality requirements.
16. We enter into contracts with our subcontractors, in compliance with data protection regulations, that precisely define the conditions and methods for processing personal data.

7. Is your data transferred outside the European Union?

17. We may transfer your personal data outside the European Union as part of the IT tools used for our activities.
18. In the event that the recipient country does not ensure a level of protection of personal data equivalent to the European Union, Groupe Lucien Barrière undertakes, in the absence of an adequacy decision and after having assessed the level of protection of your rights on the territory of the third country where the recipient of your personal data is established, to take all necessary measures to ensure the protection of your personal data on the basis of appropriate guarantees (in particular the standard contractual clauses defined by the European Commission), which may be obtained directly from the company Groupe Lucien Barrière at the following address dpo@groupebarriere.com

8. How do we protect your data?

19. We attach particular importance to the security of your personal data.
20. Groupe Lucien Barrière has implemented technical and organizational measures adapted to the degree of sensitivity of personal data, in order to ensure the integrity and confidentiality of data and to protect them against any malicious intrusion, loss, alteration or disclosure to unauthorized third parties.

9. What are your rights?

21. Groupe Lucien Barrière, as data controller, is particularly concerned with respecting the rights granted to you within the framework of the data processing it carries out, in order to guarantee fair and transparent processing taking into account the particular circumstances and context in which your personal data is processed.
22. **Your right of access:** as such, you have confirmation that your personal data is or is not being processed and, where it is, you have the right to request a copy of your data and information regarding:
 - the purposes of the processing;
 - the categories of personal data concerned;
 - the recipients or categories of recipients as well as, where applicable if such communications were to be made, the international organisations to which the personal data has been or will be communicated, in particular recipients established in third countries;
 - where possible, the envisaged retention period for the personal data or, where this is not possible, the criteria used to determine that period;
 - the existence of the right to request from the data controller the rectification or erasure of your personal data, the right to request the restriction of processing of your personal data, and the right to object to such processing;
 - the right to lodge a complaint with a supervisory authority;
 - information relating to the source of the data where it is not collected directly from the data subjects;
 - the existence of automated decision-making, including profiling, and in the latter case, useful information concerning the underlying logic, as well as the significance and envisaged consequences of such processing for the data subjects.

23. **Your right to rectification of your data:** you may ask us to rectify your personal data, complete it if it is inaccurate, incomplete, ambiguous or outdated, as the case may be.
24. **Your right to erasure:** you may ask us to erase your personal data in the cases provided for by legislation and regulations. Your attention is drawn to the fact that the right to erasure of data is not a general right and can only be exercised if one of the grounds provided for in the applicable regulations is present.
25. **Your right to restriction of processing of your data:** you may request the restriction of the processing of your personal data in the cases provided for by legislation and regulations.
26. **Your right to object:** you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data whose legal basis is the legitimate interest pursued by the data controller. To object, please send your request to the following email address: dpo@groupebarriere.com or by post to the following address: SA Groupe Lucien Barrière, 33 Rue d'Artois, 75008 Paris.
27. **Your right to data portability:** you have the right to the portability of your personal data. We draw your attention to the fact that this is not a general right. Indeed, not all data from all processing operations is portable and this right only covers automated processing, to the exclusion of manual or paper-based processing. This right is limited to processing whose legal basis is your consent or the performance of pre-contractual measures or a contract.
28. **Your right to withdraw your consent:** where the data processing we carry out is based on your consent, you may withdraw it at any time. We will then cease processing your personal data without the previous operations for which you had consented being called into question.
29. You have the option to issue instructions regarding the retention, erasure and communication of your personal data after your death and to designate a person to carry out these instructions. That person shall then be entitled to take note of the instructions and request their implementation from the data controller.
30. You may inform us of your instructions regarding the fate of your personal data processed by Groupe Lucien Barrière by writing to the email address or postal address indicated in Article 11 of this data protection policy.
31. You may modify or revoke your instructions at any time.

10. How can you exercise your rights?

32. All the rights listed above can be exercised by providing proof of your identity by any means:
 - to the following e-mail address: dpo@groupebarriere.com; or
 - by post sent to the following address:

SA Groupe Lucien Barrière
33 rue d'Artois
75008
Paris

33. If necessary, you can lodge a complaint with Cnil via its [website](#) or by post at the following address: 3, place de Fontenoy - TSA 80715 - 75334 Paris Cedex 07. This right may be exercised at any time free of charge, apart from the cost of postage where applicable, and any costs of assistance or representation if you choose to be assisted in this procedure by a third party.

11. Who should I contact if I have questions or comments about this Data Protection Policy?

34. Any questions relating to this Data Protection Policy may be asked on the Groupe Lucien Barrière website at the following address: dpo@groupebarriere.com.
35. Alternatively, you can contact Groupe Lucien Barrière at the following postal address:

Société Anonyme Groupe Lucien Barrière
33 rue d'Artois
75008
Paris