

PRIVACY POLICY

ULYSSE.COM

The Privacy Policy aims to inform Users about the processing of Personal Data carried out by Ulysse when Users use the Platform or the mobile application published by Ulysse (the "**Application**"), as well as the rules that Ulysse applies when processing information directly or indirectly related to any User as the controller of such data.

The Privacy Policy supplements the General Terms and Conditions of Use (GTCU). Terms in uppercase letters that are not defined in the Privacy Policy have the meaning ascribed to them in the GTCU.

By using the Platform or the Application, Users are bound by the Privacy Policy, which may be modified or updated at any time. Any modification will be posted on the Platform and the Application. Ulysse thus encourages Users to regularly review the Privacy Policy. If the modifications or updates concern elements for which Users' consent had been required, Ulysse will inform Users to obtain their consent again.

1. WHAT PERSONAL DATA IS COLLECTED BY ULYSSE?

When Users browse the Platform or the Application, Ulysse may collect several pieces of Personal Data, including but not limited to:

- Users' identities and the identities of travelers for whom Flight Tickets are booked and/or registered in the Account: their names, surnames, contact details (email and postal address, phone number), passport number and expiration date, nationality;
- Certain data regarding Users who require assistance in the event they travel with a wheelchair or need additional oxygen;
- Data related to Users' Orders, including flight numbers, ticket numbers, purchase details, customer invoices, received or offered Gift Cards*;
- Data related to subscription to FlightClub, if applicable*;
- Data related to payment methods: Users' potential Vacation Vouchers, the payment method used (Vacation Vouchers, Ulysse Credit, credit card, cryptocurrencies, Gift Cards)*;
- Data related to the use of referral codes, whether the User is a referrer or a referee*;
- Data necessary for loyalty actions, promotional offers, and targeted advertising, including the history of bookings and pages visited on the Platform;
- Details from the contact form used on the Platform or the exchanged messages through the Platform's chat*.

All of this Personal Data is collected when the User configures their Account, places an Order, or contacts Ulysse's support service.

All data identified by an asterisk (*) are data that Users must provide to Ulysse in order to place an Order or contact Ulysse's support.

Users are required to provide Ulysse with their data in a truthful, accurate, and genuine manner.

2. WHY DOES ULYSSE COLLECT AND USE USERS' PERSONAL DATA AND ON WHAT BASIS?

Ulysse uses Users' Personal Data for the following reasons:

- To allow Users to create an Account (which is mandatory on the Application and optional on the Platform), manage their Orders, register their travelers, and enable them to book a car through its dedicated search engine (legal basis: GTCU binding Users to Ulysse);
- To manage Orders made by Users on the Platform, including car reservations made through Ulysse's search engine, the resulting commercial relationship, manage Users' complaints, and assist Users in exercising their rights in accordance with European Regulation No. 261/2004 in the event of flight delays or cancellations (legal basis: GTCU binding Users to Ulysse);
- To manage Services provided to Customers through FlightClub (legal basis: GTCU binding Users to Ulysse);
- To enable Users to subscribe to travel insurance offered by a partner (legal basis: Ulysse's legitimate interest, which is to offer Users additional services related to the purchase of Flight Tickets);
- To offer services currently under development to Users (legal basis: Ulysse's legitimate interest, which is to promote its new Services);
- To credit the amount of Vacation Vouchers received to Users' Accounts. In this case, Users' data is used based on the GTCU binding Users to Ulysse;
- To carry out commercial prospecting operations, if Users have consented or have not objected to receiving commercial offers during an Order;
- To manage Ulysse's referral program (legal basis: Ulysse's legitimate interest, which is to promote Services by rewarding referrers and referees);
- To gather Users' opinions when they consult and comment on Ulysse's publicly accessible roadmap. In this case, Personal Data is collected based on Ulysse's legitimate interest, which is to determine expected functionalities of the Platform and the Application, as well as to inform Users of projects undertaken by Ulysse to develop its Services.

3. HOW LONG DOES ULYSSE RETAIN USERS' PERSONAL DATA?

Generally, Ulysse retains Users' Personal Data as long as they have an Account. If the User does not have an Account, Ulysse retains their Personal Data until the flight booked by the Users has taken place and the statutory limitation period has expired.

Specifically, Ulysse may retain Users' and Customers' Personal Data for the following periods:

- Up to five (5) years for all contractual documents and ten (10) years for accounting and tax documents, and for contracts exceeding €120 according to current regulations;
- Up to three (3) years from the Users' last contact if they have agreed to receive commercial prospecting;
- Up to three (3) years for Users' interactions on the Platform and with support, and if Users' interactions relate to complaints regarding their Orders, their data may be kept for five (5) years;
- If Users have created an Account, Ulysse may proceed with the deletion of their Accounts after a period of three (3) years of inactivity.

4. WHO ARE THE RECIPIENTS OF USERS' DATA?

In the scope of its activity and Platform management, Ulysse may transmit Users' Personal Data to several recipients, particularly its service providers and partners.

The recipients of Users' Personal Data include:

- Airlines with whom Users have booked one or more Flight Tickets or the computer reservation systems that Ulysse may use to book Flight Tickets on behalf of Customers with Airlines;
- BSP Auto, Ulysse's partner for vehicle reservations, whose servers are located in the United States and within the European Union; the transfer of Users' Personal Data is governed by the European Commission's standard contractual clauses;
- Koala, Ulysse's insurance partner, if Users choose to subscribe to travel insurance;
- Alliazn, Ulysse's insurance partner for vehicle rentals if Users choose to subscribe to insurance for deductible reimbursement;
- Flyi.o, the host of the Platform and Users' data. The servers used are located within the territory of the European Union;
- Payment service providers used on the Platform, notably Paypal if Users use Paypal for payment, Coinbase if Users wish to pay via cryptocurrency and have a Coinbase wallet, Alma, and Checkout;
- HelpScout, the publisher and host of the support solution used by Ulysse, whose servers are located in the United States. The transfer of Users' Personal Data is governed by the European Commission's standard contractual clauses;
- Postmark and customer.io, service providers for sending emails to Users, whose servers are located in the United States. The transmission of Users' Personal Data to the United States is governed by the European Commission's standard contractual clauses. Ulysse also uses the services of the company Lemlist for email sending, with servers located in France;
- Various social networks for advertising purposes, such as Instagram, Facebook and TikTok.

With the exception of the scenarios mentioned above and for managing Services for Users, Ulysse undertakes not to disclose, transfer, or convey Users' Personal Data to third parties without their consent, except where they should be communicated to judicial and administrative authorities upon legal requisitions.

5. QUELS SONT LES DROITS DES UTILISATEURS SUR LEURS DONNÉES ?

WHAT ARE THE RIGHTS OF USERS REGARDING THEIR DATA?

Users can control the use of their Personal Data through various rights they have over it.

Users can exercise the following rights with Ulysse:

- Right of access, which allows Users to know the information Ulysse holds about them and the reasons for Ulysse's usage;
- Right to rectify or have rectified their data if it is inaccurate or incomplete;
- Right to erasure of their data. This right enables Users to obtain the erasure of data held by Ulysse, subject to the data that Ulysse must retain to comply with legal obligations or to defend its rights in court;
- Right to data portability, which allows Users to receive their personal data in a structured, commonly used, and machine-readable format or to request Ulysse to transmit it to another company;
- Right to restriction of data processing. In this case, Ulysse will no longer use Users' data but may retain it to comply with legal obligations or defend its rights in court;
- Right to object to data processing when Ulysse uses Users' data for its legitimate interests. Users can also object to the processing of their data for commercial prospecting purposes, notably by clicking on the designated link in Ulysse's emails;
- Right to provide a digital will, meaning directives regarding the use of Users' data after their death.

When Ulysse uses Users' personal data with their consent, Users have the right to withdraw this consent at any time, but this will not affect the lawfulness of the processing carried out before the withdrawal of consent.

Users can exercise their rights by writing to:

- Ulysse - Service Client – 3, chemin du moulin 77610 Marles-en-Brie ; ou
- privacy@ulyссе.com.

Finally, Users have the right to lodge a complaint with the National Commission for Data Protection and Liberties (CNIL).

COOKIE POLICY

On the Platform and the Application, Ulysse may use cookies. The purpose of this cookie policy (the "**Cookie Policy**") is to inform Users about the cookies used by Ulysse on its Platform and Application, as well as Users' rights regarding these cookies.

○ WHAT IS A COOKIE?

A cookie is a file that can be saved on the hard drive of the User's device when they visit the Platform. These small files can contain, for example, the language of the browser, the User's shopping cart, and their preferences.

Ulysse places cookies on Users' devices to enable them to browse the Platform under optimal conditions, to save their profile, restore their preferences when logging in via their usual device, or to compile statistics.

o **COOKIES USED BY ULYSSE**

Ulysse uses the following types of cookies:

- Navigation cookies: Necessary for the proper technical functioning of the Platform and the Application as they optimize the display of content from each terminal.
- Functional cookies: Not essential for the Platform's proper functioning but enhance the user experience by allowing identification of Users, saving their language preferences, and retaining their shopping cart.

Nom du Cookies	Finalité
Ulysse-User-id	Identifier of the connected User
Ulysse-Auth-Token	Authentication token allowing verification of the connected User
ulysses:cookie-consent	Stores User's consent or refusal to store cookies for analytical and measurement purposes
ulysses:experiments	Maintains the version of the site viewed to ensure consistent navigation

- Analytical and audience measurement cookies: Used to track Users' navigation for optimization purposes. Ulysse uses the "Plausible.io" solution, which does not collect any Personal Data related to Users and has servers located in the European Union.

Ulysse also utilizes the following solutions:

- o Google Analytics and Google AdSense: Collects data including the number of Platform visitors, the source, and details of visited pages to track and study Platform and Application usage, and to generate activity reports. Data might be transferred to the United States. Main cookies used include:

Nom du Cookies	Finalité
_gcl_au	Google cookies for tracking User conversions

- o Hotjar: Collects User behavior data on the Platform or Application to assist Ulysse in optimizing both. Hotjar stores this information in a pseudonymized user profile. Data may be transferred to the United States, governed by the European Commission's standard contractual clauses. Hotjar's privacy policy is available [here](#);

Nom du Cookies	Finalité
hjSessionUser{site_id}	User's identification number assigned when first connecting to the Platform or Application, stored for subsequent connections
_hjFirstSeen	Identifies the User's first session on the Platform or Application and its duration
_hjIncludedInPageviewSample	Configured cookies to allow Hotjar to determine if the User has been included in Ulysse's defined data sample for page view limits
_hjIncludedInSessionSample	Configured cookies to allow Hotjar to determine if the User has been included in Ulysse's defined data sample for daily session limits on the Platform or Application
hjSession{site_id}	Maintains the User's session on the Platform or Application

- o Rudderstack: Collects User events on the Platform or Application. Rudderstack servers are located in the United States, with data transfer regulated by standard contractual clauses. Rudderstack's privacy policy is available [here](#);

Les données sont ensuite redistribuées à [Amplitude](#).

Nom du Cookies	Finalité
rl_anonymous_id	These cookies are used by Rudderstack to assign a unique identifier to each visitor to track User interactions with the Platform or Application
rl_group_id	
rl_group_trait	
_rl_page_init_referrer	
rl_page_init_referring_domain	
rl_trait	
rl_user_id	

- o Facebook Pixel et Conversions: Servers located in the United States, data transfer governed by standard contractual clauses. The cookie used is "_fbp," which records and tracks Users' navigation on the Platform and several other websites. Facebook's privacy policy is available [here](#).
- Affiliation cookies via Affiliae: Enables tracking or identification of Users who visit the Platform or Application via an affiliate link. Cookies used start with the letters "ae," and data is hosted within the European Union.

Users can accept or refuse the storage of cookies on their devices through the banner provided while browsing the Platform.

Ulysse does not retain cookies for tracking Users or obtaining IP addresses beyond twelve (12) months after initial storage on Users' devices. However, Ulysse will seek consent from Users again after a period of six (6) months.

Users can delete cookies at any time using their browser and configure it to prevent cookie storage on their devices.

Ulysse recommends Users refer to their browser's help file for the appropriate configuration. Browsing the Platform without accepting cookies may result in a degraded experience.

○ TRAFFIC DATA

Traffic data is generated when the device is connected to the internet and to the Platform.

This data may be used for statistical purposes to conduct traffic analysis on the Platform and improve it by adapting it to Users' needs. Traffic data is never used by Ulysse in a personally identifiable manner.