

CUSTOMER REVIEWS POLICY

This document dictates the terms and conditions under which customers and / or Internet users must comply in order for their review to be accepted and published.

CTOUTVERT acts as a trusted third party to collect and feature Customer Reviews related to a consumer experience on the one hand and, on the other hand, to ensure the collected content's compliance with French law and the NF standard. ISO 20488 September 2018 that we pledge to respect in order to preserve the reliability of the published Customer Reviews.

All Internet users are informed that viewing the pages featuring customer reviews means full and complete acceptance of this policy on customer reviews and its conditions.

By submitting a review, users acknowledge having read this policy and accept it in its entirety without reservation.

Definitions

« **Customer** »: natural person who acts for purposes that do not fall within the scope of his commercial, industrial, craft or liberal activity.

« **Review** » or « **Customer Review** »: any comment posted on this site about a consumer experience. The Review can either be requested or spontaneous.

« **Partner Establishment** »: the tourist establishments in which the Customers have made a stay.

« **Conflict of interest** »: the situation in which the Customer submitting a Review has links with the Partner Establishment or any entity belonging to it likely to influence or appear to influence the content of the Customer Review filed.

« **Personal Data** »: any information relating to a natural person likely to be identified, directly or indirectly, particularly by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more elements specific to their physical, physiological, genetic, psychological, economic, cultural or social identity.

METHODS OF COLLECTION, PROCESSING AND DISSEMINATION OF CUSTOMER REVIEWS

I - Conditions linked to the submission of a Review

Review submissions are linked to a consumer experience, namely to a stay in one of our Partner Establishments. Customers submitting a Review must meet the following conditions:

- Be a natural person,
- Have recently stayed in the Partner Establishment concerned by the Review
- Not to be in a situation of Conflict of Interest

The customer guarantees the sincerity and authenticity of his Review, which represents correct factual information relating to his consumer experience. It is forbidden to make inappropriate comments or contrary to the law and good morals.

Once the Notice has been submitted, it is no longer possible for the customer to change it but he may request its withdrawal.

No consideration is provided in exchange for the submission of Customer Reviews.

II – Moderation process

1) Description of the moderation process

Moderation aims to check the Customer Review's compliance with French law, with Afnor ISO20488 standard as well as with these general conditions of use, in order to publish, reject or delete the content posted.

All stakeholders and acts related to moderation are identified and traceable.

Moderation before and after the publication of the Review is operated automatically and manually.

Moderation is accompanied by a right of reply from the Partner Establishment described below. It allows to deal with any potential problems with its Customer before publication of the Review.

2) Moderation before publication of Review

Reviews are issued within a maximum of 48 hours after submission, whether positive or negative.

❖ Automatic moderation

An automated moderation system is in place beforehand to prevent the publication of Reviews containing:

- Illicit textual content, including in particular rude, abusive and / or discriminatory comments.

When the rating given by the customer is under 5, the Review is automatically placed in moderation in the concerned Partner Establishment's interface so it can easily identify and answer the Customer who submitted the Review.

❖ Manual moderation

In addition to the automated moderation system before the Review is issued, we have the option, if the Partner Establishment notifies us, to manually moderate the Review before it is published, in the following cases:

- The Customer Review contains illegal content, including rude, abusive and / or discriminatory comments not detected by the system;
- Identifiable personal data features in the Review;
- The rating doesn't match the comment.

3) Moderation after publication of Review

❖ Manual moderation

Moderation after the publication of the Customer Review is possible after:

- A report from a Partner Establishment relating to a Customer Review concerning it and presenting illegal content or non-complying with these General Conditions of Use;
- A Customer Review report made by any Internet user;
- A request for deletion from the Customer Review's author.

Thus, moderation after the publication of the Customer Review makes it possible, on request, to delete Customer Reviews including:

- Textual content presenting rude, abusive and / or discriminatory comments;
- Unintelligible content;
- Textual content featuring quotes from competitors;
- A rating that doesn't match the comment.

In any case, the people responsible for carrying out the manual moderation a posteriori:

- Master the language in which the Review was written;
- Have access to the entire content of the considered Review;
- Have means to contact the Review's author in order to carry out any necessary verifications.

4) Rejection of the Customer Review and reason

We commit to systematically informing the Review's author of the rejection of a Review as well as the reason for the rejection.

We also commit to giving the Customer the possibility of submitting a new Review following the deletion of his first one.

However, it is specified that the reasons for the rejection of a Review do not have to be communicated once this Review has been identified as aiming to artificially construct or bias the assessment of the stay in the Partner Establishment.

○ Reasons for rejecting Customer Reviews

- The submitted Review is considered defamatory;
- The rating doesn't match the comment;
- Textual content contains random characters or is badly written to the point of being unintelligible;
- The Review is identified as aiming to bias the rating of the concerned Partner Establishment;

- The Review's content is unrelated to the considered consumer experience;
- The textual content contains personal data or any other information likely to lead to identity theft – the name or first name of individuals who are not public persons, a telephone number, a specific address or an email address, a credit card number, social security number, bank account number or any other information that could lead to identity theft;
- Textual content encourages purchase from a competitor;
- Textual content indicates that the user has not completed its consumer experience;
- Review manager considers its civil or criminal liability may be jeopardized;
- The content contains name-calling or profanity;
- The Review's attributes feature concrete elements of Conflicts of Interest;
- Textual content is spam or mentions websites not directly related to the consumer experience;
- Textual content features a call for legal action;
- Partner Establishment has intervened in the handling of the dispute, and the Customer wishes to update its Review;
- The Customer has expressly requested the deletion of his Review.

If an author who has submitted one or more Reviews recognized as illegal or inappropriate after moderation is identified, all future Reviews by the same author may be blocked.

5) Editing and modification

We never change a Review's content. As a result, it is not possible to:

- Correct a Review's spelling errors;
- Change the pseudonym of a Customer who has submitted a Review;
- Hide part of the Review's text;
- Change the rating.

On the other hand, the names provided when submitting the Reviews are pseudonymized in order to respect the data's confidentiality.

After a period of 1 year from the publication, the Reviews are anonymized in order to protect the Customers submitting the Reviews Personal Data.

6) Aggregation of ratings

All of the ratings of Reviews are aggregated into an overall rating according to the following calculation: sum of ratings of Reviews published / total number of Reviews published = average rating.

The total number of Customer Reviews submitted features next to the overall rating for each Partner Establishment.

III - Dissemination of Reviews

1) Dissemination methods

Reviews are displayed chronologically from the most recent to the oldest on the basis of the submission date, depending on the user's language.

Reviews are displayed in their entirety, whether positive or negative, along with the following information:

- Date of submission;
- Date of completed stay;
- Author's first name and name's first letter

Reviews are disseminated and displayed during 24 months. The average rating awarded is calculated over the same period.

Anyone can report a Review with illegal or inappropriate content using the small flag under each Review.

2) Right of reply from the concerned Partner Establishment

The concerned Partner Establishment has the possibility to answer the Reviews at any time through its customer interface.

Responses are displayed below the concerned Reviews. The Customer who wrote the Review will receive an email to review any message relating to his Review. Responses from Partner Establishments are subject to a

moderation similar to that performed on Customer Reviews, and responses can be reported in the same way as Customer Reviews.

The Partner Establishment can contact the author of the Review, whether it is a requested or spontaneous Review.

Ctoutvert does not interfere at any time in the relationship between Partner Establishments and Customers. Any dispute arising from a consumer experience carried out with a Partner Establishment is the latter's responsibility.

3) Personal data and use of Reviews

In order to comply with the legislation on Personal Data and for the sake of protection, the Customers Personal Data is subject to anonymization 1 year after their Reviews publication.

Accepting these General Conditions of Use of Reviews means the Customer acknowledges and accepts this anonymization measure.

As such, the Customer acknowledges that the Review that he submits represents only a testimony of the consumer experience he has had and is only intended to inform future Customers of this same experience. He acknowledges that this Review is neither confidential nor private, and accepts that no copyright can spring from the Review that he submits and that, in any event, no moral rights of the author can apply considering the anonymization of its Review 1 year after its publication.

Consequently, Ctoutvert as well as the Establishments have the right to use the pseudonym used by the Customer linked to the submitted Review for 1 year from its publication, and also have the right to use, reproduce, publish, make available and translate the submitted Review's content in the world and on any medium.