The data collected during your registration or throughout your membership in the Program is processed by Miles Attack, the data controller, located at 82 rue Henri Farman, 92130 Issy-les-Moulineaux, France.

The information that the User must provide in order to benefit from the loyalty program includes the following:

- Salutation
- Last Name
- First Name
- Date of Birth
- Phone Number
- Postal Address
- Email Address
- Employer Agency Information
- Password

The personal data of Users collected is used by Miles Attack for the following purposes:

Purpose of Processing	Sub-purpose	Legal Basis for Processing
Execution of the Terms and Conditions of the Program and Management of Member Enrollment in the Loyalty Program	- Account Creation - Login and use of the Miles Attack website - Assistance with the purchase of gifts via Miles - Smooth communication, management of claim follow-ups	Execution of the contract (in connection with the Terms and Conditions of Use and Privacy Policy of Miles Attack)
Marketing Communication	- Collection of users' personal information for the proper use and communication of the Miles Attack platform.	Consent

Member data is shared:

- With authorized persons from entities within the Gekko group responsible for operating the Program, as well as with their service providers.
- With Program Partners (tourism providers, Amazon, PPS, online stores) when necessary for Members to benefit from the advantages they are entitled to as Members. It is specified that Members' email addresses are not shared with Partners for them to carry out their own commercial communications unless Members have expressly consented.

Member data may be transferred to countries that do not ensure an adequate level of protection. Therefore, appropriate safeguards are put in place, copies of which Members may request. Member data may indeed be transmitted, depending on the circumstances, for the purposes mentioned above, to recipients located in non-European Union countries, such as:

- Partners, for managing Points transfers and handling claims. The list of Partners and companies is available in the section dedicated to the loyalty program on the Website (accessible here). This transfer, for which the Member expressly gives their consent for each transfer, is necessary to execute the request for a Points transfer.

Miles Attack also implements, based on its legitimate interest, personal data processing to detect and manage anomalies, particularly fraud, which may occur during a Member's enrollment or while earning or using Points. The data collected in this context is intended for authorized personnel at Miles Attack, its service providers, and, if necessary, Program Partners. Members are informed by email of any anomalies detected concerning them.

Your personal data is kept for the duration of your affiliation with the Miles Attack program or, in the case of account inactivity for more than 5 years, your data will be automatically anonymized.

Data Security Measures
Miles Attack implements appropriate technical and organizational measures to ensure the security of the personal data collected and protect it against unauthorized access, disclosure, alteration, or destruction. These measures include, but are not limited to:

- Encryption of sensitive data,
- Role-based access management,
- Regular security system audits,
- Ongoing training for our staff on data security.

We ensure that our service providers and partners also adhere to high-security standards to safeguard the personal data of Members.

In accordance with applicable regulations, the User has various rights concerning the use of their personal data. These rights include:

Access	Rectification	Data Portability
The exercise of the right of access allows the User to control the accuracy of their data and, if necessary, to have it corrected or erased.	The exercise of the right to rectification allows the User to update their data.	The exercise of the right to data portability allows the User to transfer their data to a third party of their choice. This right is limited to the data **actively provided by the user** (e.g., account information, profile details, and booking history). Users may request a copy of their data in a structured,

		commonly used, and machine-readable format.
Erasure	Objection	Restriction
The exercise of the right to erasure allows the User to obtain the deletion of their data.	The exercise of the right to object allows the User to oppose the use of their data for a specific purpose.	The exercise of the right to restriction allows the User to request an organization to temporarily freeze the use of certain of their data.

By writing to RGPD@gekko-holding.com, any Member has the right to request access to their personal data, its rectification, deletion, limitation, opposition to processing, or portability of their data.

The User may also have additional rights under the national legislation to which they are subject, such as the definition of instructions regarding the retention, deletion, and communication of personal data after their death.

In the absence of instructions provided by the User during their lifetime, a close relative may request the deletion of the User's personal data related to the Miles Attack authentication service by submitting a document justifying their legitimacy, along with a document proving the User's death (such as a death certificate).

The User also has the option to contact the relevant supervisory authority to report any issues regarding the use of their personal data.

Miles Attack reserves the right to modify this privacy policy at any time. Any changes will be posted on our website with the date of the latest update. In the case of a significant change, we will inform Members by email or another appropriate method. We encourage you to regularly review this privacy policy to stay informed of any updates.