



Privacy Policy

Protection of personal data

Version 1.0

July 2, 2026



Fenua Holidays SASU with share capital of XPF 200,000 · RCS Papeete 2640 B · No. TAHITI G53243 · Lotissement Miri N°21, Résidence Rahiti, Appt 1 — 98718 Punaauia, French Polynesia · License B — Excursion Bureau, order No. 2588/PR of December 17, 2025 · info@fenuaholidays.com

1. Who we are

The fenuaholidays.com platform, the Fenua Holidays mobile application, and associated interfaces (including the Tiki Bot assistant) are published by:

SASU Fenua Holidays

- Share capital: XPF 200,000
- Registered office: Lotissement Miri N°21 — Résidence Rahiti, Appt 1 — 98718 Punaauia, French Polynesia
- Postal address: BP 42199 — 98713 Papeete, Tahiti
- RCS Papeete 2640 B — TAHITI No. G53243
- Email: info@fenuaholidays.com

Fenua Holidays is the data controller for personal data collected via the Platform, within the meaning of applicable regulations. For data shared with service providers in connection with a booking, Fenua Holidays and the relevant service provider act as joint data controllers, under the terms set out in the agreement concluded with each service provider.

Fenua Holidays has not appointed a Data Protection Officer (DPO); the point of contact for any question relating to personal data is info@fenuaholidays.com.

2. Who this policy applies to

This policy applies to any individual whose personal data is processed by Fenua Holidays:

- Travelers ("Reva"): visitors creating an account, making a booking, or using Tiki Bot;
- Service Providers ("Fa'atere"): representatives and staff of partner companies listed on the Platform, as well as prospective service providers;
- Website visitors and subscribers to our communications (newsletter, pre-launch lists);
- Anyone who contacts us (form, email, social media).

3. Applicable legal framework

Fenua Holidays' data processing is governed by Law No. 78-17 of January 6, 1978, as amended (the French "Data Protection Act"), applicable in French Polynesia since June 1, 2019, which makes the rules of Regulation (EU) 2016/679 ("GDPR") applicable. The GDPR also applies directly to processing concerning individuals located in the European Union.

The competent supervisory authority is the Commission Nationale de l'Informatique et des Libertés (CNIL) — www.cnil.fr.

4. The data we collect

4.1 If you are a traveler (Reva)

- User account: first name, last name, email address, phone number, password (encrypted), country of residence, language, date of birth (only for activities subject to age restrictions).
- Bookings: stay or activity dates, number and composition of participants, stated preferences, information necessary for certain activities (e.g., required skill level, medical restrictions declared for activities that require it), booking number, e-voucher.
- Payment: Fenua Holidays never stores your bank details. Payment information is processed and encrypted by Banque de Tahiti's secure payment solution, in accordance with current banking standards. We only retain the transaction reference and status.
- Solidarity credit: your credit amount and choice of allocation to partner associations.

- Communications: conversations with Tiki Bot, messages to support, reviews published (rating system in Pearls).
- Browsing: technical data (IP address, device and browser type, pages viewed) and cookies — see Section 12.

4.2 If you are a Service Provider (Fa'atere)

- Identification: company name, name and professional contact details of the representative and operational contacts, TAHITI number, licenses and insurance.
- Contractual and financial: bank details for payouts, specific terms, booking and payment history.
- Content: product listings, photos, descriptions, rates, and availability entered in your interface.
- Prospecting: for Service Providers not yet partnered, professional contact details collected from public sources (website, directories, social media) or during direct meetings (tourism trade shows, field visits).

4.3 If you are a visitor or subscriber

- Forms: the information you enter when you contact us.
- Newsletter and pre-launch lists: email address, collected with your consent (double opt-in registration), and interaction data with our emails (opens, clicks).
- Browsing: cookies and technical data — see Section 12.

5. Why we use your data

Purpose	Individuals concerned	Legal basis
Creating and managing the user account	Reva	Performance of the contract (GTU)
Processing bookings, e-vouchers, transmission to the relevant Service Provider	Reva	Performance of the contract (GDPR Art. 6.1.b)
Collecting payment, paying out Service Providers, invoicing	Reva, Fa'atere	Performance of the contract / legal obligation
Managing the solidarity credit (granting, allocation, information on funded projects)	Reva	Performance of the contract
Assistance and recommendations via Tiki Bot	Reva, Fa'atere	Performance of the contract
Customer support, complaints, mediation	Reva, Fa'atere	Performance of the contract / legal obligation
Publishing and moderating reviews	Reva	Legitimate interest (Platform reliability)
Managing the Service Provider partnership (framework agreement, interface, payouts)	Fa'atere	Performance of the contract
Prospecting new Service Providers	Prospective Fa'atere	Legitimate interest (network development; professional context)
Newsletter and marketing communications for travelers	Reva, subscribers	Consent (withdrawable at any time)
Accounting, tax, and regulatory obligations (including travel agency license)	All	Legal obligation
Platform security, fraud prevention	All	Legitimate interest
Audience measurement and Platform improvement	All	Consent or legitimate interest depending on the tool — see Section 12

We never sell your personal data. We do not use it for third-party programmatic advertising purposes.

6. Tiki Bot and artificial intelligence

Tiki Bot is the Platform's conversational assistant. When you use it:

- Your exchanges are processed to respond to you (recommendations, cultural context, booking assistance) and may be retained to improve service quality for 2 years;
- The pricing and contractual information communicated by Tiki Bot comes exclusively from data entered by Service Providers, with the source cited;

- No decision producing legal effects on you is made in a fully automated way: a booking is only concluded through your express confirmation, and support remains accessible through a human contact (info@fenuaholidays.com).

We recommend that you do not share sensitive data (health, religion, etc.) with Tiki Bot that is not strictly necessary for your request.

7. Who has access to your data

Your data is accessible, to the extent required, to the following recipients:

Recipient	Role	Data concerned
The Service Provider you book with	Performance of the booking (joint data controller)	First name, last name, email, phone, dates, group composition
Banque de Tahiti	Secure payment solution	Payment data (processed and encrypted by the bank)
Vercel	Hosting of the site and databases	All Platform data
Solal & Co Ltd (Mauritius)	Development and technical maintenance of the Platform	Controlled technical access to Platform data
Brevo	Sending emails (newsletter, transactional)	Email, interaction data
Google Workspace	Messaging and internal tools	Correspondence
Audience measurement tool	Traffic statistics	Browsing data
Accountant, government authorities	Legal obligations	Accounting and tax data

Partner associations of the solidarity credit program receive no personal data about travelers: only the amounts allocated are communicated to them.

Each processor is bound by a contract compliant with Article 28 of the GDPR.

8. Transfers outside French Polynesia and the European Union

Some of our technical service providers are located outside French Polynesia and the European Union, in particular Solal & Co Ltd in Mauritius (development and maintenance). These transfers are governed by appropriate safeguards within the meaning of Articles 44 et seq. of the GDPR:

9. How long we keep your data

Data	Retention period
User account	Lifetime of the account, then deletion 3 years after the last activity
Related bookings and communications	3 years after the service, then deletion
Accounting records and invoices	10 years (legal obligation)
Solidarity credit	Credit valid for 2 years; history linked to booking data (3 years)
Published reviews	Lifetime of the account, then 1 year after its deletion
Tiki Bot conversations	2 years
Service Provider prospecting	3 years after the last contact with no positive response
Newsletter	Until unsubscription, then 3 years maximum
Cookies	13 months maximum (detailed periods in the cookie banner)
Connection data and technical logs	12 months

At the end of these periods, data is irreversibly deleted or anonymized.

10. Your rights

You have the following rights over your data: access, rectification, erasure, restriction of processing, objection (in particular to prospecting, at any time and without giving a reason), portability, withdrawal of your consent at any time (without affecting processing already carried out), and the right to set post-mortem directives regarding the fate of your data.

To exercise your rights: info@fenuaholidays.com, specifying the purpose of your request. Proof of identity may be requested in the event of reasonable doubt. We respond within one month, extendable by two months for complex requests.

If you believe your rights are not being respected, you may lodge a complaint with the CNIL (www.cnil.fr — 3 place de Fontenoy, TSA 80715, 75334 Paris Cedex 07).

11. Security

Fenua Holidays implements appropriate technical and organizational measures: encryption of communications (HTTPS), password encryption, payment fully delegated to Banque de Tahiti's secure solution, access segregation, logging, and confidentiality commitments from our technical service providers.

In the event of a data breach likely to create a risk to your rights and freedoms, Fenua Holidays notifies the CNIL within 72 hours and, in the event of a high risk, informs you directly.

12. Cookies and trackers

On your first visit, a banner lets you accept, refuse, or configure cookies by category:

- Essential cookies: necessary for the Platform to function (session, booking cart, security) — exempt from consent;
- Audience measurement cookies:
- Marketing cookies:

You may change your choices at any time via the "Manage cookies" link in the footer. Validity period of your choice: 6 months. Maximum cookie lifespan: 13 months.

13. Minors

Booking on the Platform is reserved for adults with the legal capacity to enter into contracts. Data of minor participants in a stay or activity is only collected under the responsibility of the adult making the booking, and only to the extent necessary for the service.

14. Changes to this policy

We may update this policy to reflect changes to the Platform or to regulations. Any material change will be notified to you by email or by a visible notice on the Platform, with the update date. The version in effect is the one published at fenuaholidays.com.

15. Contact

For any question relating to this policy or to your personal data:

- SASU Fenua Holidays — BP 42199 — 98713 Papeete, Tahiti, French Polynesia
- Email: info@fenuaholidays.com

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