

Privacy & Policy

Effective as of 25 May 2018

1. Introduction

Luxury Catamarans at www.luxurycatamarans.com (hereinafter “the Website”) is an online platform that assists Users with booking sailing charters offered by brokers, agencies and catamaran owners.

As Data Controller for Luxury Catamarans, we developed this Privacy Policy to ensure that Users are informed how we collect, store, use and manage personal data.

This Privacy Policy applies to all persons, who access the Website, such as potential and existing customers, the Website visitors and/or any persons, who, for any reason, contact or provide information to Luxury Catamarans via the Website contact forms, using the contact details provided on the Website or otherwise.

This Privacy Policy covers all data collected and services offered through the Website or a Luxury Catamaran agent, including any interaction with or use of the Website as well as the Booking Process.

Any link, plugin or redirection to third-party websites, partner networks, advertisers or other third-party services available on Luxury Catamarans Website does not constitute our affiliation with, support or sponsorship of third-party companies or individuals.

This Privacy Policy does not apply to any information or data collected by third parties, including through any links, plugins or redirections to third-party websites, partner networks or services. We are not responsible for the actions of third-party companies or individuals.

By accessing and interacting with the Luxury Catamarans Website in any form or manner, Users agree to this Privacy Policy and personal data processing as described herein.

2. Definitions

This Privacy Policy is based on the European Union’s General Data Protection Regulation (GDPR), therefore, we use the terminology provided by Article 4 of GDPR for Personal Data, Data Subject, Processing, Data Controller, Data Processor, Third party, Consent.

3. Data Collection

As the Data Controller we make sure that collection of personal data is minimal, fair, transparent, as well as is done for a lawful purpose and on a legal basis.

We collect personal data that is strictly necessary for Luxury Catamarans to provide best services possible to existing and future Users.

Data collected may include Personal Information about the Users, any special categories of personal information the Users share with us to request specific and/or additional services, personal information about other passengers and any other personal and/or general information that may be necessary for Luxury Catamarans to perform and/or improve the quality of their services.

3.1. Personal Information about the Users

Priority of Luxury Catamarans service is to help its Users experience the best catamaran sailing holidays. This will not be possible without knowing the Users in person.

3.1.1. To provide the best service possible, we collect personal data and preferences that Users share with us when:

(1) filling in the forms on the Website, sending an email or making a call, including through the FreeCall function available, to get in touch with, ask for a quotation from and/or make a booking through an agent of Luxury Catamarans.

(2) providing a comment on the Website, giving a review about our service, registering for any special deals and offers or Website newsletters, sending messages via email, using live chat function, including via Facebook Messenger plugin, when interacting with the Website and/or communicating with an agent of Luxury Catamarans.

This data may include Users' name, surname, e-mail address, telephone number, location, boat and itinerary preferences, any other information that Users' may find necessary to share in order to request a specific service or specify services they require from Luxury Catamarans.

3.1.2. To specify a service, indicate a preference, request a special and/or an additional service, Users might find it necessary to voluntarily provide us with special categories of personal data, such as health information or revealing religious views or sexual orientation. Such information may be provided at any point of requesting for or using our service, including when making a booking or requesting a cancellation by:

(1) using Luxury Catamarans Website, including filling in a contact form, or

(2) by any other means, such as via telephone, including FreeCall, or through a live chat.

These special categories of personal data will be collected and processed only as strictly necessary to fulfill User-specific requests and provide specific services.

3.1.3. Other categories of personal data provided by Users may include payment data and insurance data. We collect these categories of data only if and when it is strictly necessary to fulfill our service and/or contractual obligations. We do not store any payment or insurance data of the Users. We only process this sort of information to fulfill our obligations as a service provider and a contract party, and send it to trusted third-party partners.

3.2. Personal Data of all Passengers

Personal Data of all passengers, copy of their personal documents such as ID card, sailing license and specific sailing certification when filling in the crew list and using the online services.

When a User submits someone else's personal data, for instance when booking on someone else's behalf, we understand that such User provides such details upon this person's consent and only after he/she has been given access to this Privacy Policy.

Service of Luxury Catamarans, including reservation and booking, are not directed at children under 16 years old. In limited instances, for purposes of fulfilling contractual obligations or performing our services, we may need to collect and process information concerning children under 16 years old, for example, when a passenger is a child under 16 years old.

The collection and use of such information will be limited only to the purpose as provided by his/her parent or guardian or with specific consent. If a User submits such information, we understand that the information about a child under 16 years old has been provided upon a valid consent of a child's parent or a guardian.

We do not store information of other passengers (including children) provided to us by Users. We only process information of other passengers (including children) to fulfill our obligations as a service provider and a contract party, and send it to trusted third-party partners.

3.3. General Information about the Website Users

We collect general data and information when a data subject or automated system calls up the Website.

3.3.1. Data collected automatically when the Website is called up may include:

- (1) the browser types and versions used,
- (2) the operating system used by the accessing system,
- (3) the website from which an accessing system reaches the Website (so-called referrers),
- (4) the use of search function of the Website
- (5) the use of sub-websites,
- (6) the date and time of access to the Website,
- (7) an Internet protocol address (IP address),
- (8) the Internet service provider of the accessing system, and
- (9) any other similar general data and information.

3.3.2. We do not use this data to draw any conclusions about the Website Users (data subjects). This data is anonymised and stored in the server log files of the Website. Collection of this data is necessary to:

- (1) deliver the content of the Website correctly,
- (2) optimize the content of the Website as well as its visibility on the internet,
- (3) ensure the long-term viability of our information technology systems and website technology.

3.3.3. Some general data and information about the Website Users is directly or indirectly collected from third parties, such as Google Adwords, Google Analytics, Facebook, FreeCall, MailTrack.

The Website does not have its own cookies. In the meantime, the Website elements include third-party technologies that collect cookies on behalf of these third parties. Facebook, Instagram or Google plugins and pixels are examples of such third-party technologies.

4. Data Processing

We process Users' personal data collected as described above (see 3. Data Collection) only for specific and limited purposes.

We use personal data to provide best possible experience with our service to the Luxury Catamaran Users.

Providing the best service to our Users includes processing personal data to:

- (1) contact and communicate with Users regarding our services;
- (2) enable booking of our services, successfully complete booking process as well as request for and negotiations of terms connected to our services with a Luxury Catamaran agent;
- (3) personalize User experience with our services;
- (4) administer, protect, optimize, operate and improve the Website as well as our service based on User feedback or feedback based on personal data of Users;
- (5) quickly process bookings and transactions;
- (6) inform Users about new services, special deals, specific offers, updates, alerts and other information connected to our services;
- (7) to comply with legal obligations, resolve legal disputes connected to our services and/or enforce legal agreements with any third parties; and/or
- (8) for other purposes allowing and enabling us to perform our services.

From time to time, we may analyze general data and information collected at the server log files by way of keeping and studying statistics based on such personal data, with the aim of increasing the data protection and data security of our services, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

5. Data Disclosures

We do not disclose collected personal data to third parties unless such third parties are authorized by a contractual relationship, legal basis or legal requirements to receive such personal data.

The authorized third parties may include, but is not limited to catamaran owners, insurance agents, professional advisors, website hosting partners and other parties who assist us in operating the Website, conducting our business, or servicing the Users, so long as those parties agree to keep this information confidential, private and secure.

We may also share personal data when we believe that such disclosure is appropriate to comply with the law, to enforce the Website policies, or protect rights, property, or safety of the Website, the Users or other persons.

6. Data Retention

We retain personal data of Users only for as long as is necessary for the purposes described in this Privacy Policy. We will retain and use such information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws or to properly fulfill our obligations under a contract), resolve disputes, and enforce our legal agreements and policies.

7. Rights of the Data Subject

Users are granted certain rights under the applicable EU laws. Principal rights are:

- (1) the right to access;
- (2) the right to rectification;
- (3) the right to erasure;
- (4) the right to restrict processing;
- (5) the right to object to processing;
- (6) the right to data portability;
- (7) the right to complain to a supervisory authority; and
- (8) the right to withdraw consent.

Users are entitled to exercise these rights at any point in time by submitting a formal written request to the Data Controller of Luxury Catamarans via the Website (<https://luxurycatamarans.com/contact>) or using the contact details as provided in the introduction to this Privacy Policy.

Please note that User rights for data protection are complex and not absolute. In some cases, especially if Users wish to delete or stop processing of their personal data, it may also mean that we may not be able to continue to provide the services to them. Applicable data protection laws may provide certain restrictions on the extent to which these rights may be exercised. If a restriction applies, we will respond to such User request with an

explanation of what action will be taken, to the extent required under applicable data protection law.

8. Changes to this Privacy Policy

We may update this policy from time to time by publishing a new version on the Website. We may notify our Users of significant changes to this Privacy Policy.

9. Contact of Data Controller

For contact in connection with this Privacy Policy, please refer to:

Georgios Iatridis - LuxuryCatamarans

<https://luxurycatamarans.com/contact>

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