SailingEurope Privacy Policy

Introduction

Navigatio Europae d.o.o. (hereinafter: SailingEurope), Av. Dubrovnik 15, Paviljon 9a, 10020 Zagreb, Croatia, takes the protection of its customers' and prospective customers' personal data very seriously - and notify you here of the modality of our handling of individual-related data. The following Privacy Policy will provide you with information about the personal information that is being collected, processed and used.

This page informs you of our policies regarding the collection, use, and disclosure of personal data when you navigate throughout our website www.sailingeurope.com and the choices you have associated with that data.

This policy applies when we act as a data controller with respect to the personal data of our visitors.

Relevant Legislation

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

General Data Protection Regulation EU 2016/679 (GDPR) Law on enforcement of General Data Protection Regulation

What data we collect about you

Personal information you voluntarily provide

Personal information is information that specifically identifies an individual, such as your name, email address, telephone number, address, company, sex, and country.

We only collect personal information from you when you:

 Contact us directly by email. You can find the list of our emails on our <u>contact center</u> page.

- Contact us directly by phone call. You can find our telephone numbers on our <u>contact</u> <u>center</u> page.
- Contact us through our email forms on pages, such as Yacht charter in Croatia.
- Fill an inquiry form on our boat search engine page.
- Contact us through our "Call us" or "We call you" that we have on our <u>homepage</u>.
- Contact us through our Chat option.
- Fill our newsletter subscription form.
- Place a comment on our blog.
- Fill in a questionnaire.
- Fill an email form on our sailing route planner page.

Non-personal information we collect

When you use our website, we may use technologies like Google Analytics, tawk.to, Facebook or other third-party tools to collect information about your visit to our website. In an essence, these tools provide us with the information on how you interact with our website, social media or newsletter campaigns.

Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses cookies, text files stored on your computer, to help the website analyze how users use the site. We use this data to determine the number of users visiting our website, to identify how they arrived to our website, and to obtain a better understanding of their behavior on our website, such as most-viewed pages.

You can read more about the Google Privacy Policy on this link.

Furthermore, you can prohibit Google from collecting and analyzing the cookie generated data about your use of the website by installing the browser plugin provided on this link.

Google Remarketing

We use Google AdWords Remarketing service which is provided by Google, Inc.

You can read more about the Google Privacy Policy on this link.

Furthermore, you can prohibit Google from collecting and analyzing the cookie-generated data about your use of the website by installing the browser plugin provided on this link.

Facebook

With your permission, our website utilizes the Conversion Tracking Pixel service of Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA. This tool allows us to follow the actions of users after they are redirected to a provider's website by clicking on a Facebook advertisement. This service enables us to record the efficacy of Facebook advertisements for statistical and market research purposes. The collected personal data data remain anonymous. Since the collected data is being saved by Facebook, they are able to connect the data with your Facebook account and use the data for their own advertising purposes, in accordance with Facebook's Data Use Policy found here. Facebook Conversion Tracking also allows Facebook and its partners to show you advertisements on and outside Facebook. In addition, a cookie will be saved onto your computer for these purposes.

If you are younger than the age of 16, please consult your legal guardians in order to obtain their permission.

Please click here if you would like to revoke your permission.

Review

SailingEurope uses review.co.uk for the collection of your reviews on our service. You can refer to their privacy policy on this link.

Tawk.to

Sailing Europe uses tawk.to, a software tool that provides us with the more interactive communication in order to solve your potential issues during your visit to our website. You can refer to their Privacy policy on this link.

In addition, certain pieces of information such as IP address, browser version, and access times are automatically sent to us by your computer or mobile device, and are stored on our server. Information regarding the type of mobile device and operating system being used is also collected at this time. We only use this information to conduct statistical and performance analyses, or to prosecute unauthorized use of our website. The information remains anonymous whenever possible.

How and why we use your data

Business-related data processing

SailingEurope processes your personal data to be able to deliver our services to you, and to run, maintain and develop our businesses.

If you contact our sales, we will use the information provided by you in accordance with our terms of use. In order to ensure that our services are in line with your needs, these data will be used to gather information like statistical analysis, customer satisfaction surveys, business improvement, or any other business related action with an end goal of providing you the best possible offer.

SailingEurope processes your personal data to perform our contractual obligations towards you, and to comply with legal obligations. Furthermore, we process your personal data to pursue our legitimate interest to maintain and develop our businesses.

Direct marketing activities

SailingEurope processes your personal data to inform you about our services and to inform you of changes and top solutions for our services and products. Your data are also used for research and analysis to improve our services and our website experience.

We may also use your data entered on our website in certain cases to send information by email newsletter campaigns about other services, provided that you have given us consent to that.

Our internal servers

None of your supplied data will be stored on this website, sold, or passed to any of the thirdparty data processors defined below.

Instead, the data will be collated into an CRM system via Web API services protected by <u>TLS</u> (sometimes known as SSL), meaning that the content is encrypted using <u>SHA-2</u>, 256-bit cryptography before being sent across the internet.

On the aforementioned contact forms, we will provide you with the possibility to choose to opt in/out to our direct marketing campaigns.

Where we store your data

The storage locations are selected in accordance to run with maximum productivity and performance and to create redundancies so the data is protected in the unlikely event of power outage. We diligently carry out business to achieve that the data we gather under this privacy policy is processed conforming to the directives of the policy and the requirements of applicable law wherever the data is located.

Cookie policy

We use cookies on our website. These are small text files stored on your computer. We use both permanent cookies and session cookies, so that we can offer you the best service possible.

The data saved in the cookies makes the use of our services as comfortable as possible for you, not only for your current use of the respective service, but also beyond it.

If you do not want to allow permanent cookies, you can select the option to deactivate permanent cookies in your browser.

Data Breach

We will report any unlawful data breach of this website's database or the database(s) of any of our third-party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

Your rights

We think it is important that you are able to control your personal information. You have the following rights:

- a) **Right to access information**: you have a right to obtain confirmation from SailingEurope as to whether or not personal data concerning you is being processed, as well as the access to the respective data, including the issuance copy.
- b) **Right to rectification**: you have a right to obtain from SailingEurope without undue delay the rectification of inaccurate personal data including the right to complete incomplete data.

- c) Right to erasure: you have a right to obtain from SailingEurope the erasure of your personal data without undue delay if there is an issue with the underlying legality of the data processing.
- d) Right to be forgotten: you have the right to obtain from SailingEurope the erasure of personal data without undue delay and SailingEurope shall have the obligation to erase personal data without undue delay where applicable in accordance to the Article 17 of GDPR.
- e) **Right to the restriction of processing**: you have the right to obtain from SailingEurope the restriction of processing where one of the following applies:
- the accuracy of data is objected by the data subject
- unlawful processing and data subject objects the erasure of data and requests the restriction instead
- data no longer necessary for the purpose, but required by data subject to the establishment, exercise, or defense of legal claims
- objection to further processing, pending verification of legitimate grounds to override those of data subject
- f) Right to data portability: you have the right to receive the personal data in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller without hindrance from SailingEurope to which the personal data have been provided.
- g) **Right to object**: you have the right to object to the processing your personal data at any time on the following address: privacy@sailingeurope.com
- h) **Right against the automated decision**: you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects.

Changes to our Privacy Policy

This privacy policy may be subject to change from time to time, in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.

Contact

privacy@sailingeurope.com