

INFORMATION ON THE PROCESSING OF PERSONAL DATA

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DATA CONTROLLER, PURPOSES and LEGAL BASES OF PROCESSING

Albatros Top Boat S.r.l. (hereinafter, ALBATROS), in the person of its *pro tempore Legal Representative*, Via Fiume, 6, 28925 Verbania (VB), VAT 01819900034, privacy@albatrostopboat.com, is the **Data Controller** of the personal data of users collected during the use of the services of the following Websites www.albatrostopboat.com (i), www.luxuryyachtmaldives.com (ii) www.maldivesforyou.com (iii), the management of questionnaires and data collection forms.

Albatros will process the personal data it comes into contact with in compliance with the principles of lawfulness, fairness and transparency as well as the provisions of law and regulations for the following purposes:

- access to the website and navigation;
- requests for information, quotes and contacts;
- registration, access and management of the reserved area, with consequent management of reservations and activities arising from them;
- sending commercial communications;

- feedback section;
- Filling in customer questionnaires (pre-boarding form, satisfaction).

In detail, the use of personal data for access to the site and browsing activity, as well as the compilation of the various (online) questionnaires, involve the processing of data to execute measures adopted at the request of the data subject, which is the legal basis that legitimizes the processing. The use of personal data for the management of further processing operations, together with the specific legal bases for the processing, are described in the section of this policy on the principles applicable to the processing of data by Albatros.

PLACE OF DATA PROCESSING

The processing related to the web services of this Site takes place at the aforementioned registered office of the Data Controller and at the *hosting* company providing the service.

CATEGORIES OF PERSONAL DATA

Browsing data

The computer systems and *software* procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the *URI (Uniform Resource Identifier)* addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the *server* (successful, error, etc.) and other parameters related to the user's operating system and IT environment.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in the event of computer crimes against the site or the Data Controller: except for this eventuality, at present, the data on *web contacts* do not persist beyond the terms of the law.

Data provided voluntarily by the user

The optional, specific and voluntary sending of e-mails to the addresses indicated on this site involves the subsequent acquisition of the sender's address by Albatros, which is necessary to respond to requests, as well as any other personal data included in the communication.

Personal Data collected through special forms, the "book" section and/or the request for quotes

Through the functions present within the Albatros website, in particular by filling in specific data collection forms, the user can provide some personal information that can make him identifiable and that can be processed in order to manage, for example, the latter's requests.

Among the information that may be requested, there are, but are not limited to, personal data such as:

- Name and Surname;
- Phone number and email address;
- Data relating to the health of the data subject, in particular with regard to the request for information on diving activities and/or other sports activities for which knowledge of the health conditions of the natural person is necessary to assess the suitability of the latter to perform the aforementioned activities.

Personal Data collected through special forms (pre-boarding and/or liking)

Customers' personal data may also be transmitted to Albatros by means of specific questionnaires (in particular by means of the so-called "Pre-Shipment Form" and "Satisfaction Form"), sent to Customers via specific links.

The pre-boarding form aims to collect useful information before the trip or the start of the activity purchased, in order to make the service as close as possible to the needs of the individual customer.

The satisfaction form, on the other hand, is always sent to the customer via a special link, in order to collect opinions and/or any improvement actions on the services offered by Albatros.

Among the information that may be requested, there are, but are not limited to, personal data such as:

- Name and Surname;
- Phone number and email address;
- Data relating to the health of the data subject, in particular with regard to the request for information on diving activities and/or other sports activities for which knowledge of the health conditions of the natural person is necessary to assess the suitability of the latter to perform the aforementioned activities.

COOKIES USED BY THIS SITE

To view the information on the use of cookies on the Site, the user can consult the following <https://www.luxuryyachtmaldives.com/cookie-policy/> :

PRINCIPLES APPLICABLE TO DATA PROCESSING BY ALBATROS

Albatros will process your personal data in a lawful, fair and transparent manner.

The Data Controller will collect users' personal data and process them only for the purposes indicated in this Privacy Policy and in such a way that they are not incompatible with the purposes themselves.

The data processed by Albatros is adequate, relevant and limited to what is necessary for the purposes for which it is processed, including:

1. REQUESTS FOR INFORMATION, QUOTES AND CONTACTS

The Data Controller will process the personal data of users who fill in the appropriate *online forms* for requesting information regarding the initiatives, projects, products or services offered by Albatros in order to manage, verify and provide what the data subject has requested.

The user has the possibility to provide additional information, including data of a particular nature (e.g. health data, the communication of which is not mandatory for the purpose of sending the request for information regarding diving and/or other sports activities, but in any case necessary for the purpose of assessing the suitability of the data subject to perform the requested activity).

Such additional data will be processed by Albatros in accordance with the requirements of the regulations in force. In particular, the data will be recorded, stored and used to respond to the requests of the interested parties and for the time necessary to achieve the aforementioned purpose. The legal basis for this processing is the execution of pre-contractual measures taken at the request of the data subject (Art. 6, para. 1 lit. b) GDPR).

For personal data of a particular nature, on the other hand, the legal basis for the processing is the consent of the data subject (art. 9, par. 2 lett. a), GDPR).

The provision of data of any nature for this processing purpose is optional. However, failure to provide data, partial or incorrect provision may make it impossible for Albatros to manage and follow up on user requests.

2. FILLING IN ONLINE FORMS (PRE-BOARDING AND/OR LIKING)

The Data Controller will process the personal data of users who fill in the appropriate *online forms* for the collection of information whose knowledge, on the part of the Data Controller, is necessary for the purpose of providing the service requested by the data subject.

The personal data of users who fill out the satisfaction form, on the other hand, are processed by the data controller in order to improve services.

The user also has the possibility to provide personal data of a particular nature (e.g. health data, the communication of which is necessary for the purpose of assessing the suitability of the data subject to perform the requested activity).

This data will be processed by Albatros in accordance with the requirements of the regulations in force.

In particular, the data will be recorded, stored and used to respond to the requests of the interested parties and for the time necessary to achieve the aforementioned purpose. The legal basis for this processing is the execution of pre-contractual measures taken at the request of the data subject (Art. 6, para. 1 lit. b) GDPR).

For personal data of a particular nature, on the other hand, the legal basis for the processing is the consent of the data subject (art. 9, par. 2 lett. a), GDPR).

The provision of data of any nature for this processing purpose is optional. However, failure to provide data, partial or incorrect provision may make it impossible for Albatros to manage and follow up on user requests.

3. REGISTRATION, ACCESS AND MANAGEMENT OF THE RESERVED AREA

Albatros will process the user's personal data to allow the use of the services reserved for registered users. For this purpose, Albatros will process your personal data to:

- to allow the user to access and browse the Site;
- to allow the user to access the Site and browse as a logged-in user, recognizing the user regardless of the device used;
- maintain and manage your account;
- store your data and information in your account;
- store in the account of the logged in travel agency the personal data (name, surname and tax code) of customers who have purchased Albatros services through the agency itself;
- follow up on booking requests, with the execution of the various activities resulting from the request (by way of example but not limited to, recording the booking in the history, invoicing, payment).

The legal basis for this processing is the fulfilment of the contract or, as the case may be, the execution of pre-contractual measures adopted at the request of the data subject (Article 6, paragraph 1 letter b), EU Reg. 2016/679).

For these purposes, the data will be processed for the time strictly necessary to carry out the individual processing activities. However, Albatros may retain the data for the purposes and for the maximum retention periods indicated in this policy or in the cases established by the Regulation and/or by law.

The provision of data for the purpose in question is optional, however, since the processing is necessary to allow access to the Site and/or navigation as a logged in user and/or the provision of account management and maintenance services, failure to communicate data will make it impossible for the user to register, access the reserved area of the Site and use the services reserved for registered users.

4. FEEDBACK SECTION - REVIEWS

The interested party can release, by filling out the appropriate online form or by filling out the satisfaction form, a review of the travel experience with Albatros. In these cases, the indication of the name, surname and content of the message, or the review, is required to be published in some dedicated sections of the Data Controller's website

You may provide additional information, which will be processed by Albatros in accordance with the requirements of the applicable legislation in force. The legal basis for the processing is the execution of pre-contractual measures adopted at the request of the data subject (art. 6, par. 1 lett. b) GDPR).

5. SENDING COMMERCIAL COMMUNICATIONS

Subject to the consent of the interested party exercised by means of a specific tick in the data collection form, Albatros will process the user's personal data (personal and contact data) for the sending of communications, also in the form of newsletters, relating to the initiatives, projects, products or services offered by Albatros and the related data will be recorded, stored and used exclusively for sending communications to promote the activity, the initiatives and projects promoted by the Data Controller.

The legal basis for this processing is the consent of the data subject (art. 6, par. 1 lett. a), GDPR). The provision of consent for this purpose is optional and the data will be processed until the withdrawal of consent by the interested party, which can be exercised at any time (by clicking on *unsubscribe* at the bottom of the communication received or by written request to the email address privacy@albatrostopboat.com)

SOCIAL PLUG-IN

This website uses the so-called "social plug-ins".

"Social plug-ins" are specific tools that allow you to embed the functions of the *Social Network* directly within the website.

All "social plug-ins" on the website are marked with the respective logo owned by the social networking platform.

When you visit a page of our website and interact with the "plug-in" or decide to leave a comment via the social platform, the corresponding information is transmitted by your *browser* directly to the relevant social platform and stored there.

For information on the purposes, type and methods of collection, processing, use and storage of personal data by the *Social Network* platform, as well as for the methods through which to exercise your rights, please consult the specific *Privacy Policy* of the *Social Network*.

PROCESSING METHODS

Personal data are and will be processed, in paper and/or digital form, for the time strictly necessary to achieve the purposes and purposes for which they were collected.

No automated processing of the data collected, including user profiling, is active.

Specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorized access.

TRANSFER OF DATA TO COUNTRIES OUTSIDE THE EUROPEAN UNION

The personal data collected by Albatros are processed and stored within the territory of the European Union. Some personal data may be transferred to recipients located outside the European Economic Area. In this case, the transfer will take place in compliance with the provisions of Chapter V of EU Regulation 2016/679 ("GDPR"); in particular, the data will be transferred only after signing the Standard Contractual Clauses approved by the EU Commission with decision no. 2021/914/EU or to countries capable of guaranteeing an adequate level of protection of personal data and therefore recipients of an Adequacy Decision adopted by the EU Commission.

CATEGORIES OF SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED (RECIPIENTS)

The subjects to whom Albatros may communicate the data act as Data Processors designated through specific agreements or as persons authorised to process personal data by the Data Controller. The data may be communicated to external Companies and/or Professionals to fulfil specific obligations imposed on the Data Controller by current legislation.

Finally, personal data, including those of a particular nature (specifically health data that may be collected), may be communicated to subsidiaries and/or investee companies of the Data Controller.

More specifically, the communication of any health information to other companies that perform the service requested by the user (food allergies and/or health conditions that may affect any sports activities) may be necessary in order to adapt this service to the specific needs of the data subject. In

these cases, the aforementioned companies will act as independent data controllers for the processing operations belonging to their area of competence.

The interested party, by requesting access to their personal data, can obtain the list of recipients of their personal data by writing an e-mail to privacy@albatrostopboat.com

RIGHTS OF THE DATA SUBJECTS

The interested users of the Site have the right, pursuant to art. 15-22 GDPR, of:

- **Request access to personal data:** You have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning you is being processed and, if so, access to the data. Access may be directed to obtaining the following information:
 - The purposes of the processing;
 - The categories of personal data in question;
 - The recipients or categories of recipients to whom the data have been or will be disclosed, in particular if they are intended for third countries or international organisations;
 - The retention period of personal data or the criteria used to determine this period;
 - The existence of the right to request the Data Controller to rectify or delete the data or to limit the processing or object to the same;
 - The existence of automated decision-making.
- **Request for rectification of personal data:** You have the right to obtain the rectification of inaccurate personal data concerning you, as well as to obtain the completion of incomplete personal data.
- **Request for deletion of personal data:** for the reasons indicated in Article 17 of the GDPR, the data subject has the right to request the Data Controller to delete the data without undue delay and the Data Controller has the obligation to delete the personal data of the data subject, provided that there is no statutory retention obligation on the data.
- **Request for restriction of data processing:** In the event that one of the hypotheses referred to in Article 18 GDPR applies, the data subject has the right to request the restriction of the processing of data concerning him/her.
- **Request for data portability:** the data subject has the right to receive in a structured, commonly used and readable format, the personal data concerning him or her provided to a Data Controller and has the right to transmit such data to another Data Controller if the processing is based on consent, on a contract or is carried out by automated means.

- **Request to object to processing:** You have the right to object to the processing of personal data concerning you at any time, on grounds relating to your particular situation.
- **Withdrawal of consent:** The data subject has the right, at any time and with the ease with which he or she has given it, to withdraw consent to the processing of his or her personal data.

The data subject also has the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it).

Requests for the exercise of the above-mentioned rights by the data subject can be sent to privacy@albatrostopboat.com

This privacy policy was updated on 28 November 2024.