

---

# PRINCESS YACHTS PRIVACY POLICY

FEBRUARY 2019

## CONTENTS

INTRODUCTION.....	1
1. IMPORTANT INFORMATION AND WHO WE ARE .....	2
2. THE DATA WE COLLECT ABOUT YOU.....	3
3. HOW YOUR DATA IS COLLECTED AND HOW WE USE YOUR DATA.....	6
4. COOKIES.....	16
5. DISCLOSURES OF YOUR DATA.....	17
6. INTERNATIONAL TRANSFERS .....	21
7. DATA RETENTION.....	22
8. YOUR LEGAL RIGHTS.....	23

## INTRODUCTION

Princess Yachts Limited (“Princess Yachts”, “we”, “us” or “our”) is committed to protecting and respecting the privacy of its customers and potential customers, employees of its partners and suppliers and any freelancers it may work with, and visitors to its Premises and/or Website (“you” or “your”, as the context requires) and is committed to protecting your personal data.

This privacy policy tells you how we look after your personal data when you: visit our premises defined at clause 3.1 (“Premises”); visit our website, <https://www.princessyachts.com> (regardless of where you visit it from) (“Website”); when you purchase products (including yachts and related merchandise) or request services (including after sales services or invitations to events, including our boat shows and other yacht relating marketing events (“Events”)) from us (as described in further detail below) (collectively our “Products and Services”); work with us to provide our Products and Services to our customers; receive marketing from us; and about your privacy rights and how the law protects you.

Over the last 50 years we have developed an extensive network of distributors worldwide so that we can bring you a personalised world-class service almost anywhere (each a “Distributor”). Our Distributors have collectively gained decades of experience and have un-paralleled knowledge of our yachts. In order to provide you with a specialised and personalised service we may provide your personal data to our Distributor that is located in the country where you indicate to us you are based (“Local Distributor”), who may contact you directly and who you may deal with on a day to day basis.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### 1.1. Purpose of this privacy policy

This privacy policy aims to give you information on how Princess Yachts Limited collects and processes your personal data for the purposes described in Section 3 below.

Our Website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other fair processing notice or privacy policy we may provide on specific occasions when we collect or process personal data about you, so you are fully aware of how and why we are using your data. This privacy policy supplements such other notices and does not replace them.

### 1.2. Controller

Princess Yachts Limited is the controller and responsible for the Website, Premises, supplying the Products and Services and your personal data.

### 1.3. Data protection manager

We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any request to exercise any of your legal rights, please contact the data protection manager using the contact details below.

### 1.4. Contact details

Princess Yachts Limited

Adrian Bratt

Email address: [adrian.bratt@princessyachts.com](mailto:adrian.bratt@princessyachts.com)

Postal address: Newport Street, Plymouth, Devon, PL1 3QG

You have the right to complain at any time to the Information Commissioner's Office (ICO), which is the UK's supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, we will always try to resolve your concerns so recommend that you contact us in the first instance before you approach the ICO.

### 1.5. Changes to this privacy policy and your duty to tell us of changes

This version was last updated in February 2019. Earlier versions can be obtained by contacting us.

We may change this privacy policy from time to time and any changes will be posted on this page, and where required, notified to you by email provided we have your email address. Please check back regularly to keep informed of updates or changes to this policy.

It is important that the personal data we hold about you is accurate and up-to-date. Please let us know if any of your personal data changes during your relationship with us.

### 1.6. Third party links and websites

Our Website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third parties and are not responsible for their privacy policies or the practices of those third parties. We recommend that you read the privacy policy of every website you visit and every plug-in or application you use.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (for example, anonymous or aggregated data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows and the terms used in this Section 2 are used throughout this privacy policy:

- Advertising and Targeting Data:
  - Activity on advertisers' digital properties: data about your browsing activity on our website or application.
  - Device and browser information: technical information about the device or browser you use to access our website including your IP address, cookie string data, operating system and device and unique identifier for your mobile (if applicable);
  - Ad data: data about the online advertisements you have received including volume, where the advertisement appeared, whether you clicked on the advertisement;
  - Data from advertising partners;
  - Emails received from us, including your email address;
  - Hashed email addresses, where hashing is activated to pseudonymise email addresses.
- Aftersales Customer Account Data: name, address, email address and phone number.
- Aftersales Services Support Data: name, address, email address, phone number, date of birth, a copy of your passport (which will include at least your passport number, place of birth, date of issue, data of expiry, issuing authority of passport), details of your next of kin (name, address and phone number) and/or pick-up and drop-off locations.
- Aftersales Training Data: name and email address.
- Aftersales Warranty Claim Data: yacht owner's name, yacht identification number, location of the yacht, a delivery address for any parts, contact information of the yacht owner and/or yacht crew (which may include an email address and/or phone number), name of the Distributor (if applicable), additional information about the yacht (which we do not consider to be personal data).
- CCTV Data: visual images/footage of you on our Premises.
- Customer Data: one or more of the following, depending on whether you are a prospective or current customer; name and family names, address, email address, phone number, residing country, Distributor, broker, initial date of enquiry, latest communication date, current status, prospect level, if we have a contract with you, your interests and marketing preferences.
- Customer Due Diligence Data: name, address, date of birth, nationality, occupation, country of residence, a copy of your passport (which will include at least your passport number, place of birth, date of issue, data of expiry, issuing authority of passport), a copy of your national ID card, a copy of your driving licence and/or a copy of your utility bill.
- Customer Due Diligence Report Data: name, address, date of birth, nationality, gender, occupation, country of residence, a copy of your passport (which will include at least your passport number, place of birth, date of issue, data of expiry, issuing authority of passport), a copy of your national ID card, a copy of your driving licence, a pass or fail result and/or a reference number of the report.
- Customer Payment Data: name, address and bank account information (which will include the relevant bank account information that we request from you depending on where you are paying the funds from).
- Customer Third Party Payment Data: name, address, bank account information (which will include the relevant bank account information that we request from you depending on where you are paying the funds from), information of the beneficial owner of the yacht (including name, address, date of

birth, nationality, occupation, a copy of their passport (which will include at least your passport number, place of birth, date of issue, data of expiry, issuing authority of passport).

- Dealer and/or Media Contact Data: name, address, email address and phone number.
- Event Accommodation Data: name, email address and phone number.
- Event App Registration Data: name, email address, phone number, nationality, yacht owner's name, location of the yacht and yacht interests.
- Event Feedback Data: means the information described below under "*Attending an Event and speaking with our Event hosts or dealers*".
- Event Host Data: name, age, work experience, spoken languages, headshots, height and dress and/or uniform sizes.
- Event Registration Data: name, email address, phone number and dietary requirements (if a meal will be provided at the Event).
- Event Travel Data: name, address, email address, phone number, date of birth, a copy of your passport (which will include at least your passport number, place of birth, date of issue, data of expiry, issuing authority of passport) and/or pick-up and drop-off locations.
- General Enquiry Data: name, email address, phone number (optional), information you provide to us in your enquiry.
- Health and Safety Data: shoe size, head size and jacket size.
- Incident Claim Data: claimant's name, signature, address, email address, phone number, date of birth, national insurance number, medical information (including if attended hospital, information of any rehabilitation, time taken off work, funding arrangements) and information about the Incident (including some information which we do not consider to be personal data, for example, the value of the claim).
- Incident Data: name, signature, address, phone number, age, information about the Incident (which may or may not be personal data depending on the Incident and if such information could identify you, for example, rare medical conditions).
- Incident First Aider Data: name, email address and phone number.
- Incident Witness Data: name, email address, phone number and witness statements.
- Marketing Media Data: name, address, email address, position, the company you are employed by and a profile picture of you.
- Marketing Subscriber Data: email address.
- Marketing Tracking Data: email address, received receipt of an email, read receipt of an email, number of opens of an email and/or date and time of first open.
- Promotional Film and/or Media Data: name, email address, phone number, dietary requirements (if a meal will be provided on set) and video footage of you in the promotional film or photographs of you in the promotional media.
- Promotional Film and/or Media Set Data: name, email address, phone number, dietary requirements (if a meal will be provided on set).
- RINA Data: name, address (registered office if the owner is a company), registration number, phone number, fax, email address and address for correspondence of the owner of the yacht (if a company

or individual), and name of representative and title of the representative of the owner of the yacht (if the owner is a company) (as applicable). Where the owner is a company, also the VAT number. For owners who are individuals, your date of birth, place of birth, and country of birth and tax code.

- Visitor Data: name, signature, car registration number and the company you are employed by.
- Website Store Customer Data: name, address, email address and phone number (optional).
- WiFi Data: your device's MAC address.
- Yacht Ownership Data: name and address of the owner (if the owner is an individual or company), and where the owner is a company, the name and signatures of the directors of the company.

### 3. HOW YOUR DATA IS COLLECTED AND HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation or as required by a regulatory or governmental authority.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending marketing communications to you.

#### 3.1. Visiting our Premises

Our Premises include:

- Newport Street, Stonehouse, Plymouth, Devon, PL1 3QG and land at Market Close and Market Street, Plymouth, PL1 3SY
- Coypool Road, Plympton, Plymouth, Devon, PL7 4NW
- Eastern Wood Road, Plympton, Plymouth, PL7 5ET and Garden Close, Plympton, Plymouth, together our Langage premises
- North Road, Lee Mill Industrial Estate, Devon
- Central Avenue, Lee Mill Industrial Estate, Devon

##### 3.1.1. Visiting our Premises:

- If you are a visitor on our Premises you will be required to sign in at our reception in our visitor registration book. We also use closed-circuit television (CCTV) for security purposes and you can obtain a copy of our CCTV policy from reception. We process your Visitor Data for the purposes of ensuring the safety and security of our employees and any other visitors attending our Premises.
- We process your Visitor Data in order to comply with a legal or regulatory obligation. We have a legitimate interest to process your CCTV Data for security purposes and crime prevention.

##### 3.1.2. Registering to attend a tour of our Premises:

- If you are a visitor on our Premises and you are attending a tour of our Premises, which may include a tour of our boat yard and production factory, we care about your safety and we have an obligation under health and safety legislation to protect you in situations which may give rise to an Incident on our Premises.
- We will request your Health and Safety Data in order to provide you with health and safety equipment that we require you to wear during your tour of our Premises, which may include safety shoes, safety goggles, a hard hat and/or a high-vis jacket.
- We process Health and Safety Data in order to comply with a legal or regulatory obligation.

##### 3.1.3. If you are involved in an Incident on our Premises:

- If you are a visitor on our Premises, and if you happen to be involved in an accident or you are injured ("Incident"), we have an obligation under health and safety legislation to record information about the Incident and we will do so by recording

your Incident Data. This will include recording your Incident Data if you have suffered an Incident and recording the Incident Witness Data and the Incident First Aider Data of those that have been involved in the Incident, whether to support the person suffering the Incident or otherwise.

- If you suffer an Incident you may seek to make a claim against us. In the event that you do, we will process your Incident Claim Data, Incident Data, the Incident Witness Data and the Incident First Aider Data in order to process and respond to your claim in accordance with our legal and regulatory obligations to do so.
- We process Incident Claim Data, Incident Data, Incident Witness Data and Incident First Aider Data in order to comply with a legal or regulatory obligation.

#### **3.1.4. Using our WiFi while on our Premises:**

- If you are a visitor on our Premises and you use our WiFi, you will be required to agree to our acceptable use policy that applies to your use of our WiFi. Please refer to these terms separately. We process your WiFi Data when you use our WiFi in order to perform the contract we have with you to provide you with WiFi.

### **3.2. Visiting our Website**

#### **3.2.1. Visiting our Website:**

- When you visit our Website we use cookies. Please refer to Section 4 (Cookies) of this privacy policy where we explain the types of cookies we use, how we use cookies on our Website and the lawful basis that we rely on to process cookies.

#### **3.2.2. Making a general enquiry via our Website:**

- When you visit our Website you may choose to contact us about a general enquiry you have about our Products and Services. You can do so by entering your General Enquiry Data at: [www.princessyachts.com/contact](http://www.princessyachts.com/contact).
- We will send your general enquiry to the contact who is most suited to responding to your general enquiry who will respond accordingly.
- We have a legitimate interest to process your General Enquiry Data for the purposes of responding to your general enquiry.

#### **3.2.3. Contacting us to request technical information or support about your purchase:**

- If you have a query about Products and Services that you have purchased from us, you can contact us by entering your General Enquiry Data at: [www.princessyachts.com/contact](http://www.princessyachts.com/contact).
- We will send your query to the contact who is most suited to responding to your query who will respond accordingly, which may include if you use this method of communication to report a query that would be dealt with as part of the Aftersales Services we provide (please refer to Section 3.4.4 below).
- On the whole, we process your General Enquiry Data in these circumstances for the performance of contract we have with you or the person you are contacting us on behalf of and from whom you have authority to do so (for example, yacht crew requesting assistance from us in respect of the yacht owner's purchase), in order to fulfil our obligations in the contract we have to provide the Products and Services to you or the person you are contacting us on behalf of.
- In some limited circumstances we may have a legal obligation to process your General Enquiry Data in these circumstances if, for example, your query relates to

the laws governing the sale of goods or supply of services to consumers. When these situations arise, we process your General Enquiry Data in these circumstances in order to comply with a legal or regulatory obligation.

### 3.3. Attending our Events

#### 3.3.1. Registering to attend an Event, and registering your attendance at an Event:

- We host Events throughout the year and require attendees at our Events to register in order to be able to attend our Events. Our Events include our boat shows and other yacht related events to promote our Products and Services.
- In some circumstances we receive your Event Registration Data from a third party who requests us to register you to attend the Event, for example your Local Distributor. In other circumstances we receive your Event Registration Data directly from you.
- We process your Event Registration Data in order to register you when you attend our Events and provide you with a meal and general hospitality at the Event (only in circumstances when a meal is provided at the Event). If we do provide you with hospitality we will process your name only for the purposes of creating place cards and a table plan for the meal. One of our employees or an Event host acting on our behalf will check you in when you arrive at the Event.
- We have a legitimate interest to process your Event Registration Data for the purposes of ensuring the safety and security of our attendees, employees and other third parties acting on our behalf at our Events and to ensure that we provide you with a meal that meets your dietary requirements.

#### 3.3.2. Booking travel for our media contacts and their transport to our Events:

- We invite media partners to attend our Events in order to promote our company and our Products and Services. We work with our media partners to create press releases that promote our Events. If you are an employee of one of our media partners, you may be required to attend one of our Events.
- In certain circumstances we may be required to arrange your travel in order for you to be able to attend our Event. When we book your travel we are required to process your Event Travel Data. Where required, we share your Event Travel Data with a third party booking provider and/or directly with the travel provider. If we book transport for you, we share your pick-up and drop-off locations with the transport provider.
- We have a legitimate interest to process your Event Travel Data to arrange your travel to fulfil the obligations we have directly with your employer and in order to host our Events for our customers.

#### 3.3.3. Booking accommodation for attendees attending our Events:

- If you are due to attend one of our Events we may offer to book your accommodation if you require accommodation. We process your Event Accommodation Data to book your accommodation and share it with a third party booking provider and/or directly with the accommodation provider.
- We process your Event Accommodation Data for the performance of a contract we have directly with you to provide you with accommodation.

#### 3.3.4. Attending an Event and speaking with our Event hosts or dealers:

- If you attend an Event, you will be greeted by Event hosts. These Event hosts are either employed by us or are working on our behalf.
- If you speak with our Event hosts or a dealer employed by one of our Distributors, you may be asked a series of questions about you, your experience at the Event and your views on our Products and Services (“Event Feedback Data”).
- We process your Event Feedback Data to tailor the marketing we send to you and to engage with you in respect of those Products and Services that interest you.
- We rely on your consent to process your Event Feedback Data.

### 3.4. Purchasing Products and receiving Services from us or one of our Distributors

#### 3.4.1. Carrying out customer due diligence in respect of your purchase of a yacht:

- If you purchase a yacht from us we have legal and regulatory obligations to carry out customer due diligence on our customers (where our customer is an individual), or the beneficial owners of our customer (where our customer is a company). We may also carry out customer due diligence on a third party who is acting on behalf of our customer, for example, on the dealer of a Distributor.
- We process your Customer Due Diligence Data for the purposes of carrying out a credit check, verifying your identity and for anti-money laundering and anti-fraud purposes. These checks are to protect both you and us.
- As a result of these checks, we may receive your Customer Due Diligence Report Data which we are required to assess to enable us to satisfy our legal and regulatory obligations in order to sell a yacht to you.
- We process Customer Due Diligence Data and Customer Due Diligence Report Data in order to comply with a legal or regulatory obligation.

#### 3.4.2. Maintaining sales enquiry logs and customer databases and responding to sales enquires:

- We maintain sales enquiry logs and customer databases of prospective and current customers to assist us with managing the relationships with have with these customers and following up on their requests in respect of our Products and Services. These sales enquiry logs and customer databases contain your Customer Data.
- We then use Customer Data when we are engaging with you to discuss a potential or actual sale of our Products and Services. We use a range of communication methods and contact you in accordance with your preferences.
- We process your Customer Data for the performance of the contract we have with you, or if you are a prospective customer, in order to take steps at your request to enter into a contract with you.

#### 3.4.3. Receiving a copy of the builder’s certificate as proof of manufacture of the yacht and/or bill of sale as proof of ownership:

- If you purchase a yacht from a Distributor, we will issue the builder’s certificate to the Distributor, which requires us to process your Yacht Ownership Data. Alternatively, if you purchase a yacht directly from us, we will issue the builder’s certificate to you, and will require us to process your Yacht Ownership Data. This is a document which evidences that the yacht was manufactured by us and is owned by you.
- We process Yacht Ownership Data for the performance of the contract we have with you.

**3.4.4. Receiving a certificate of class from the Royal Institution of Naval Architects (RINA) in respect of your purchase of a yacht:**

- If you wish to maintain the class of your yacht you will be required to fill in a 'Request for Class Maintenance Form' and provide us with your RINA Data. Upon receipt of your 'Request for Class Maintenance Form' we send this to RINA who issue certificates of class for yachts.
- We have a legitimate interest to process RINA Data for the purposes of enabling you to receive a certificate of class from RINA to evidence that your yacht is maintained and operated in a way that minimises risks to those using the yacht, the yacht itself or the environment.

**3.4.5. Receiving payment from a customer or a third party acting on behalf of a customer for the customer's purchase of a yacht:**

- If you purchase a yacht from us we will process payment for your yacht in whichever way you choose to pay. We may process payment directly from you (as the customer) or from a third party acting on your behalf.
- If we process payments directly from a customer, we will process your Customer Payment Data in order to be able to complete the transaction for the purchase of a yacht from us. If we process payment from a third party acting on behalf of a customer, we will process your Customer Third Party Payment Data in order to be able to complete the transaction for the purchase of a yacht from us.
- In any case, we process Customer Payment Data or Customer Third Party Payment Data for the performance of the contract we have with you or the person you are paying us on behalf of and from whom you have authority to do so, in order to fulfil our obligations in the contract we have to provide the yacht to you or the person you are contacting us on behalf of.

**3.4.6. Purchasing Products from us from via our Website store:**

- We sell merchandise on our Website; if you wish to purchase any merchandise from our Website store please visit: <https://merchandise.princessyachts.com>.
- If you choose to purchase any merchandise from our Website store, we will process your Website Store Customer Data in order to facilitate the purchase of such merchandise and the delivery of the merchandise to you. We do not process any debit or credit card information when you purchase any merchandise from our

Website store, we rely on a third party payment processor, who does not share your debit or credit card information with us.

- We process your Website Store Customer Data for the performance of the contract we have directly with you to deliver to you the merchandise you have purchased from our Website.

**3.4.7. Registering for, and receiving, our Aftersales Services:**

a) Aftersales service

- In order to identify, investigate and repair faults in yachts purchased by our customers from us or from one of our Distributors, we keep a record of your Aftersales Customer Account Data and Aftersales Warranty Claim Data in our aftersales database.

- We follow up on any warranty faults that we receive notification of, whether directly from you, a third party acting on your behalf or from a Distributor. We may need to discuss the warranty with you or a third party acting on your behalf and will process your Aftersales Customer Account Data and Aftersales Warranty Claim Data in order to do so. We may use a variety of methods and technologies to communicate with you or a third party acting on your behalf, including email, SMS, Whatsapp and/or Skype at your request.
- Your Aftersales Customer Account Data and Aftersales Warranty Claim Data will also be reviewed by our Sales team to provide you with an ongoing service and ensure that our records are kept up to date.
- We process your Aftersales Customer Account Data and Aftersales Warranty Claim Data for the performance of the contract we have directly with you or with our Distributor.

#### b) MedAire Limited – medical and security services

- We work with MedAire Limited, a third party, to offer aftersales services which includes medical and security advisory services to our customers who have purchased either directly or through a Distributor, and their Members on a Vessel (including a crewmember, passenger or guest aboard the Customer’s vessel (“Aftersales Services”). If you register to receive such services from MedAire Limited, we will receive a copy of the warranty registration form you will be required to fill in in order to be eligible for Aftersales Services which will contain your Aftersales Customer Account Data. A copy of your warranty registration form will also be received by MedAire Limited.
- We work with MedAire Limited to fulfil any requests from you or a third party acting on your behalf to carry out our Aftersales Services.
- We process your Aftersales Customer Account Data and Aftersales Warranty Claim Data for the performance of the contract we have directly with you to provide Aftersales Services or to fulfil our obligations in the contract we have with MedAire Limited to provide Aftersales Services to you, and in such circumstances it is in our legitimate interests to process your Aftersales Customer Account Data and Aftersales Warranty Claim Data.

#### 3.4.8. Attending Aftersales Services training provided by us:

- We offer online and in-person training courses to dealers working on behalf our Distributors, yacht owners and yacht crew. Our online training courses require you to provide us with your Aftersales Training Data in order for us to provide the online training course to you and keep a record of who has attended our online training courses. If you attend a training course in person we will also need to process your Aftersales Training Data for the purposes of registering and keeping a record of your attendance.
- As part of attending a training course in person we may also offer to book your accommodation if you require accommodation. We process your Aftersales Training Data to book your accommodation and share it with a third party booking provider and/or directly with the accommodation provider.
- We process your Aftersales Training Data for the performance of a contract we have directly with you to provide the online training course or the training course you attend in person that you have chosen to receive from us.

### 3.5. Working with us to provide our Products and Services to our customers

#### 3.5.1. Facilitating and assisting us to run our Events:

- We work with our Event hosts to facilitate the running of our Events. Our Event hosts are third parties we engage via our Distributors and/or supplier network.
- When engaging an Event host we process your Event Host Data in order to be able to select suitability qualified Event hosts to work our Events, choose Event hosts that will speak the local language in the location that our Event is hosted, and provide uniforms for our Event hosts when working at Event.
- We process your Event Host Data for the performance of a contract we have directly with you, or if you are employed by or affiliated with a third party, it is in our legitimate interests to process your Event Host Data in order to fulfil our obligations in the contract we have with the third party you are employed by or affiliated with.

### **3.5.2. Accessing and using the Princess Portal and other collaborative tools:**

- We work with our Distributors, media partners and marketing agencies to create and share media assets, marketing documentation and press releases (“Marketing Media”) and for project management purposes. If you are an employee of one of our Distributors, media partners or marketing agencies, you may be required to support us with creating Marketing Media or work with us for project management purposes.
- We use the Princess Portal and other third party collaborative tools to work with our Distributors, media partners and marketing agencies and in order to share Marketing Media with our Distributors, media partners and marketing agencies or for project management purposes.
- We require those accessing the Princess Portal and other collaborative tools to create a profile in order to be identified when using the Princess Portal and other collaborative tools. When creating a profile you will be required to provide us with your Marketing Media Data in order for us to set up your profile.
- We have a legitimate interest to process your Marketing Media Data for the performance of a contract we have directly with your employer.

### **3.5.3. Your involvement with our promotional films and media:**

- We work with media partners and creative agencies to create promotional films and media for the purposes of promoting our company and our Products and Services. If you are an employee of one of our media partners or creative agencies, you may be required to support us with creating promotional films and media.
- You may be required to attend one of our filming locations or photoshoots in order to produce promotional films or media. Where you attend as support to the production or creation of the promotional film or media, we process your Promotional Film and/or Media Set Data for the purposes of understanding who is part of the set and to provide you with a meal on the set (only in circumstances when a meal is provided on the set). In these circumstances we process your Promotional Film and/or Media Set Data for the performance of a contract we have directly with your employer in order to fulfil our obligations in the contract for these promotional films.
- We also work with actors, actresses and models for the purposes of creating promotional films and media. Where you attend a filming location or photoshoot and will be part of the promotional film or media, we will process your Production Film and/or Media Data for the purpose of understanding who is part of the set, to provide you with a meal at on the set (only in circumstances when a meal is provided on the set) and to use your video footage or photographs of you in our promotional films or media. In these circumstances we process your Promotional Film and/or Media Data for the performance of a contract we have directly with you, or we have a legitimate interest to process your Promotional Film and/or Media Data for the performance of a

contract we have directly with your employer or the media partner or creative agency you are affiliated with.

#### **3.5.4. Providing our Aftersales Services:**

- We work with our suppliers to carry out our Aftersales Services. If you are an employee of one of our suppliers, you may be required to support us with providing our Aftersales Services to our customers, which includes carrying out repairs on our customers' yachts.
- In certain circumstances we may be required to arrange a working visa to enable you to carry out our Aftersales Services in a particular location. We will process your Aftersales Service Support Data when we arrange a working visa for you and share such data with any authorities or embassies that will process your working visa application on our behalf. We process your Aftersales Services Support Data to arrange your working visa in order to comply with a legal or regulatory obligation.
- In certain circumstances we may be required to arrange your travel and/or accommodation in order for you to be able to carry out the Aftersales Services on our behalf. When we book your travel and/or accommodation we are required to process your Aftersales Services Support Data. Where required, we share your Aftersales Services Support Data with a third party booking provider and/or directly with the travel and/or accommodation provider. If we book transport for you, we share your pick-up and drop-off locations with the transport provider. We process your Aftersales Services Support Data to arrange your travel and/or accommodation for the performance of a contract we have directly with your employer in order to fulfil our obligations in the contract we have to provide Aftersales Services to our customers.

#### **3.6. Presenting our company to you and/or sending marketing to you**

##### **3.6.1. Submitting a general enquiry to us and subscribing to our marketing email news feed via our Website:**

- You may subscribe to receive marketing from us when you submit your general enquiry to us. If you choose to subscribe to receive marketing from us when submitting a general enquiry to us, we process your General Enquiry Data to provide you with details of our Products and Services.
- We rely on your consent to process General Enquiry Data (where General Enquiry Data is used solely for the purposes of marketing our Products and Services). We may share your General Enquiry Data that is received when you subscribe to receive marketing from us at [www.princessyachts.com/contact](http://www.princessyachts.com/contact) to any third parties provided you have given us consent to do so.
- Our digital agency uses software for advertising and re-targeting purposes. When an advertisement is placed on our website by our digital agency, they may collect some or all of the Advertising and Targeting Data to help provide adverts which are more relevant to you. Further information about how your data is collected and used can be found here: <https://www.adrollgroup.com/en-GB/privacy>

##### **3.6.2. Subscribing to our marketing email news feed via our Website:**

- When you visit our Website you may choose to subscribe to receive marketing from us. You can subscribe to our email news feed by clicking the following link and entering your Marketing Subscriber Data: [www.princessyachts.com/contact](http://www.princessyachts.com/contact).
- We rely on your consent to process Marketing Subscriber Data.

##### **3.6.3. Receiving marketing from us following your purchase of merchandise from our Website store:**

- When you purchase any merchandise from our Website store, we will record your Website Store Customer Data in our marketing database.
- We have a legitimate interest to process your Website Store Customer Data for the purposes of sending marketing to you where such marketing is in respect of similar products or services to the merchandise that you have purchased from our Website store. We may share your Website Store Customer Data for marketing purposes with any third parties, provided you have given us consent to do so.

**3.6.4. Registering to receiving marketing via our Event app:**

- When you attend an Event you may choose to subscribe to receive marketing from us. You can do so at the time you arrive at the Event and you are greeted by one of our employees or a third party acting on our behalf.
- If you choose to subscribe to receive marketing from us by registering your Event App Registration Data in the Event app, we will process your Event App Registration Data for the purposes of providing you with details of our Products and Services.
- We rely on your consent to process Event App Registration Data. We may share your Event App Data that is received when you subscribe to receive marketing from us via the Event app to third parties or share it with your Local Distributor to contact you directly to offer you products and/or services and send you invites to future events.

**3.6.5. Presenting our company to you, including our Products and Services:**

- Representatives of our company may present our company to you, including our Products and Services for the purposes of sales and marketing to you as a prospective customer of ours.
- When we do so, we may include your name on the promotional marketing materials that we present to you. We do this to tailor our presentations to you and do not present the materials to other customers.
- We have a legitimate interest to include your name on our promotional marketing materials; we consider this meets our company values by providing a more personal touch and does not pose a risk to your privacy rights.

**3.6.6. Business-to-business marketing:**

- We may send marketing materials to dealers acting on behalf of one of our Distributors or to employees of our media partners. We do so to work with our Distributors for a common purpose of promoting our company and our Products and Services to our customers. Our media partners work with us to promote our company and our Products and Services to our customers.
- In these circumstances, we process your Dealer and/or Media Contact Data in order to be able to send such marketing materials to you.
- We have a legitimate interest to process your Dealer and/or Media Contact Data for the purposes of promoting our company and our Products and Services.

**3.6.7. Analysing the effectiveness of our marketing activities:**

- When we send marketing to you (in accordance with one of more of the activities set out above in this Section 3.6) we may use cookies and/or unique identifiers to analyse the effectiveness of our marketing activities, for example, to understand how many individuals receive our marketing communications and how many read the

marketing communications (including how quickly an individual opens the marketing communication following receipt).

- We may process your Marketing Tracking Data for the purposes of analysing the number of individuals that read our marketing communications. We may correlate your Marketing Tracking Data with your General Enquiry Data for the purposes of carrying out further analysis of the effectiveness of our marketing activities, including to assess reader rates across regions.
- We rely on your consent to process your Marketing Tracking Data to analyse the effectiveness of our marketing activities.

## 4. COOKIES

We use the following categories of cookies on our Website:

- **Strictly Necessary Cookies:** these cookies are essential in order to enable you to move around our Website and use its features or to enable us to provide the Website features to you. Without these cookies, services you have asked for such as remembering your login details or purchasing merchandise from our Website store and remembering what is in your basket cannot be provided and we will not be able to process any purchases you may via our Website store.
- **Performance Cookies:** these cookies collect anonymous information on how you use our Website. For example, we use Google Analytics cookies to help us understand how visitors to our Website navigate the Website and to highlight areas where we can make improvements. The data stored by these cookies does not show personal details from which your individual identity can be established. You may opt out of these cookies using your browser settings but it may affect the performance of our Website.
- **Functionality Cookies:** these cookies assist your user experience and remember your nationality and language for the purposes of providing you with an experience more tailored to your location, by connecting you with the relevant Local Distributor should you be interested in purchasing Products or Services from a Local Distributor. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. You may opt out of these cookies using your browser settings but it may affect the functionality of our Website.

We rely on your consent to process cookies. Please refer to the additional notices on our Website for more details.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your Internet browser for instructions on how to locate the file or directory that stores cookies. Information on deleting or controlling cookies is available at [www.aboutcookies.org](http://www.aboutcookies.org). By deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our Website.

To opt out of Google Analytics cookies across all websites, please visit: [Google Analytics Opt-out Browser Add-on](#) and for other third party cookies relating to behavioral advertising, please go to [www.youronlinechoices.eu](http://www.youronlinechoices.eu). Opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver adverts tailored to your web preferences and usage patterns, so you may see a greater number of adverts that are irrelevant to you and your preferences.

In addition to the cookies that we use on our Website, we also use cookies and unique identifiers to analyse the effectiveness of our marketing activities. This is described in more detail in Section 3.6.7 above.

## 5. DISCLOSURES OF YOUR DATA

We may share your personal data with third parties if:

- Princess Yachts, its subsidiaries, or substantially all of Princess Yacht's assets are merged or acquired by a third party, in which case your personal data may form part of the transferred or merged assets;
- we are under a legal or regulatory to disclose your personal data to a regulatory authority, court, tribunal, government agency or law enforcement agency or in order to enforce our legal rights; and
- we are required by our professional advisers and auditors in order to manage and administer our business,

or for one or more of the following purposes:

Category of personal data	Processing activity	Third party or category of third party
Incident Claim Data Incident Data Incident Witness Data Incident First Aider Data	If you are involved in an Incident on our Premises (Section 3.1.3)	<ul style="list-style-type: none"> <li>• Our Incident management system provided and hosted by a third party for the purposes of keeping a record of Incidents</li> <li>• Our insurers and solicitors for the purposes of processing and responding to a claim</li> <li>• A health and safety inspector to monitor our compliance with our legal and regulatory obligations</li> </ul>
Cookies	Cookies used by us (Section 3.2.1 and as further described in Section 4)	<ul style="list-style-type: none"> <li>• Our Website hosting provider for the purposes of running our Website</li> <li>• Our cloud storage provider on behalf of our website hosting provider for the purposes of running our Website</li> </ul>
General Enquiry Data	Making a general enquiry via our Website (Section 3.2.2)	<ul style="list-style-type: none"> <li>• Our Website hosting provider for the purposes sending general enquiries to us to enable us to respond to such enquiries</li> <li>• Our cloud storage provider on behalf of our website hosting provider for the purposes of running our Website</li> <li>• Your Local Distributor if such Local Distributor is most suited to responding to your general enquiry</li> </ul>
	Contacting us to request technical information or support about your purchase (Section 3.2.3)	As above and including: <ul style="list-style-type: none"> <li>• Our supplier responsible for providing parts to repair any faults that may be part of Aftersales Services</li> </ul>
Event Registration Data	Registering to attend an Event, and registering your attendance at an Event (Section 3.3.1)	<ul style="list-style-type: none"> <li>• Our hosting provider for the purposes recording the Event Registration Data in the Event app</li> <li>• Our cloud storage provider on behalf of our hosting provider for the purposes of hosting the Event app</li> <li>• Our Event host for the purposes of operating the Event app used to register attendance at Events</li> <li>• Our caterers for the purposes of providing a meal to you (if a meal is provided at the Event)</li> <li>• Our printing supplier for the purposes of printing place cards and table plans (if a meal is provided at the Event)</li> </ul>
Event Travel Data	Booking travel for our media contacts and their transport to our Events (Section 3.3.2)	<ul style="list-style-type: none"> <li>• Our events agency for the purposes of assisting us with booking travel on your behalf with our third party booking provider and/or directly with the travel provider</li> </ul>

		<ul style="list-style-type: none"> <li>• Our third party booking provider and/or directly with the travel provider for the purposes of booking transport for an Event</li> </ul>
Event Accommodation Data	Booking accommodation for attendees attending our Events (Section 3.3.3)	<ul style="list-style-type: none"> <li>• Our events agency for the purposes of assisting us with booking accommodation on your behalf with our third party booking provider and/or directly with the accommodation provider</li> <li>• Our third party booking provider and/or directly with the accommodation provider for the purposes of booking accommodation for an Event</li> </ul>
Event Feedback Data	Attending an Event and speaking with our Event hosts or dealers (Section 3.3.4)	<ul style="list-style-type: none"> <li>• Our hosting provider for the purposes recording the Event Feedback Data in the Event app</li> <li>• Our cloud storage provider on behalf of our hosting provider for the purposes of storing the Event Feedback Data in which may be accessed via the Event app</li> <li>• Our Event host for the purposes of operating the Event app to record Event Feedback Data captured at the Event</li> <li>• Your Local Distributor has access to the Event Feedback Data for the purposes of following up a sales enquiry after the Event</li> </ul>
Customer Due Diligence Data	Carrying out customer due diligence in respect of your purchase of a yacht (Section 3.4.1)	<ul style="list-style-type: none"> <li>• Our credit checking and identity verification agency for the purposes of carrying out a credit check and identity verification check on our behalf</li> <li>• Our anti-money laundering and anti-fraud verification provider for the purposes of assist us with carrying our anti-money laundering and anti-fraud verification checks</li> </ul>
Yacht Ownership Data	Receiving a copy of the builder's certificate as proof of manufacture of the yacht and/or bill of sale as proof of ownership (Section 3.4.3)	<ul style="list-style-type: none"> <li>• Your Local Distributor may receive a copy of the Yacht Ownership Data (via receipt of the builder's certificate and/or bill of sale) as the facilitator of the sale of the yacht to you</li> <li>• A Distributor may receive a copy of the Yacht Ownership Data (via receipt of the builder's certificate and/or bill of sale) as confirmation of the owner of the yacht</li> </ul>
RINA Data	Receiving a certificate of class from the Royal Institution of Naval Architects (RINA) in respect of your purchase of a yacht (Section 3.4.4)	<ul style="list-style-type: none"> <li>• RINA for the issuing of a class maintenance certificate by RINA</li> </ul>
Website Store Customer Data	Purchasing Products from us from via our Website store (Section 3.4.6)	<ul style="list-style-type: none"> <li>• Our Website hosting provider for the purposes sending information about your purchase to us to enable us to fulfil your purchase</li> <li>• Our cloud storage provider on behalf of our website hosting provider for the purposes of running our Website</li> <li>• Our fulfilment house for the purposes of delivering your purchase to you</li> </ul>
Aftersales Customer Account Data	Registering for, and receiving, our Aftersales Services (3.4.7)	<ul style="list-style-type: none"> <li>• Our aftersales database provider and hosting provide of Aftersales Warranty Claim Data for our direct customers only</li> </ul>
Aftersales Warranty Claim Data		<p>As above and including:</p> <ul style="list-style-type: none"> <li>• Our contractors or supplier responsible for providing parts to repair any faults that may be part of Aftersales Services</li> </ul>

Aftersales Training Data	Attending Aftersales Services training provided by us (Section 3.4.8)	<ul style="list-style-type: none"> <li>• Our third party training provider for the purposes of registering your attendance and keeping a record of who has attended a training course (applies only to training courses attended in person)</li> <li>• Our third party booking provider and/or directly with the accommodation provider for the purposes of booking accommodation for a training course you attend in person</li> </ul>
Marketing Media Data	Accessing and using the Princess Portal and other collaborative tools (Section 3.5.2)	<ul style="list-style-type: none"> <li>• Our Distributors, media partners and marketing agencies for the purposes of creating and sharing Marketing Media and for project management purposes</li> <li>• Our Princess Portal hosting provider for the purposes sending information between us and our Distributors, media partners and marketing agencies through the use of the Princess Portal</li> <li>• Our cloud storage provider on behalf of our Princess Portal hosting provider for the purposes of running our Princess Portal</li> <li>• Our third party provider of the other collaborative tools for the purposes of providing such tools to us and our Distributors, media partners and marketing agencies</li> </ul>
Promotional Film and/or Media Data Promotional Film and/or Media Set Data	Your involvement with our promotional films and media (Section 3.5.3)	<ul style="list-style-type: none"> <li>• Our media partners and creative agencies for the purposes of creating promotional films and media to promote our company and our Products and Services</li> <li>• Our actors, actresses and models for the purposes of understanding who is part of the set</li> <li>• Our caterers for the purposes of providing a meal to you (if a meal is provided on set)</li> </ul>
Aftersales Service Support Data	Providing our Aftersales Services (Section 3.5.4)	<ul style="list-style-type: none"> <li>• An authority or embassy for the purposes of processing your working visa application (if a visa is required)</li> <li>• Our third party booking provider and/or directly with the travel provider for the purposes of booking travel in order for you to provide the Aftersales Services in the location where the yacht is located</li> <li>• Our third party booking provider and/or directly with the accommodation provider for the purposes of booking accommodation in order for you to provide the Aftersales Services in the location where the yacht is located</li> </ul>
Marketing Subscriber Data General Enquiry Data (where General Enquiry Data is used solely for the purposes of marketing our Products and Services)	Subscribing to our marketing email news feed via our Website, including when submitting a general enquiry to us (Section 3.6.1)	<ul style="list-style-type: none"> <li>• Our Website hosting provider and marketing database for the purposes sending your request to subscribe to our marketing email news feed</li> <li>• Our Cloud storage provider on behalf of our website hosting provider for the purposes of running our Website</li> <li>• Our third party marketing database provider for the purposes of managing our subscriber base and sending marketing communications</li> </ul>
Website Store Customer Data	Receiving marketing from us following your purchase of Products from our Website store (Section 3.6.2)	<ul style="list-style-type: none"> <li>• Our Website hosting and marketing database provider for the purposes sending your request to be added to our marketing database</li> <li>• Our cloud storage provider on behalf of our website hosting provider for the purposes of running our Website</li> <li>• Our third party marketing database provider for the purposes of managing our subscriber base and sending marketing communications</li> </ul>

Event App Registration Data	Registering to receiving marketing via our Event app (Section 3.6.3)	<ul style="list-style-type: none"> <li>• Our hosting and marketing database provider for the purposes recording the Event App Registration Data in the Event app</li> <li>• Our cloud storage provider on behalf of our hosting provider for the purposes of storing the Event App Registration Data in which may be accessed via the Event app</li> <li>• Our Event host for the purposes of operating the Event app to record Event App Registration Data captured at the Event Your Local Distributor has access to the Event App Registration Data for the purposes of following up a sales enquiry after the Event</li> <li>• Our third party marketing database provider for the purposes of managing our subscriber base and sending marketing communications</li> </ul>
Customer's name	Presenting our company to you, including our Products and Services (Section 3.6.4)	<ul style="list-style-type: none"> <li>• Our printing supplier for the purposes of printing the presentation</li> </ul>
Dealer and/or Media Contact Data	Business-to-business marketing (Section 3.6.5)	<ul style="list-style-type: none"> <li>• Our marketing database provider for the purposes storing your Dealer and/or Media Contact Data and sending marketing to you</li> </ul>
Marketing Tracking Data	Analysing the effectiveness of our marketing activities (Section 3.6.7)	<ul style="list-style-type: none"> <li>• Our third party marketing database provider for the purposes of managing our subscriber base and sending marketing communications</li> </ul>

## 6. INTERNATIONAL TRANSFERS

We will not transfer your personal data outside of the European Union, except to selected third parties that we have instructed to help us provide our services to you.

Where such transfers are to a country outside the European Union, we rely on your consent, one of the European Commission's adequacy decisions (for example, relying on a Privacy Shield certification where the transfer contains a US entity) or we will use reasonable efforts to put in place appropriate safeguards to cover transfers of your personal data including, for example, signing standard contractual clauses/data protection clauses adopted by the European Commission. Please [click here](#) for a link to the standard contractual/data protection clauses and [click here](#) for more information about the Privacy Shield for US companies.

If there are any other circumstances (for example where we are not processing your personal data for the provision of the Services) which would require us to transfer your personal data outside of the UK, we will seek your consent to transfer your personal data outside of the UK unless a legal or statutory requirement prevents us from doing so. In the event of such a transfer, where applicable, we will put appropriate safeguards in place to cover transfers of your personal data including, for example, signing standard contractual clauses/data protection clauses adopted by the European Commission, or where applicable, relying on a Privacy Shield certification where the transfer contains a US entity.

If you would like further information, please contact us at [info@princessyachts.com](mailto:info@princessyachts.com).

## 7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

## 8. YOUR LEGAL RIGHTS

As a result of us collecting and processing your personal data, you may have some or all of the following legal rights:

- to access personal data held about you;
- to request us to make any changes to your personal data if it is inaccurate or incomplete;
- to request your personal data is erased where we do not have a compelling reason to continue to process such data in certain circumstances;
- to receive your personal data provided to us as a data controller in a structured, commonly used and machine-readable format where our processing of the data is based on: (i) your consent; (ii) our necessity for performance of a contract to which you are a party to; or (iii) steps taken at your request prior to entering into a contract with us and the processing is carried out by automated means;
- to object to, or restrict, our processing of your personal data in certain circumstances;
- if we use your personal data for direct marketing, you can ask us to stop and we will comply with your request;
- if we use your personal data on the basis of having a legitimate interest, you can object to our use of it for those purposes, giving an explanation of your particular situation, and we will consider your objection;
- to object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you; and
- to lodge a complaint with a data protection supervisory body, which is the ICO.

To exercise any of your rights set out above, including to withdraw your consent where we have stated we are processing your personal data based on your consent, please contact us at [info@princessyachts.com](mailto:info@princessyachts.com) and:

- let us have enough information to identify you (e.g. name and email address);
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

If you would like to unsubscribe from any marketing communication you can also click on the 'unsubscribe' button at the bottom of the marketing communication. It may take up to 30 days before you are removed from our marketing database.