

PRIVACY POLICY

Personal data protection statement

by
Adriatic Challenge putnička agencija d.o.o.

Biogradu n/M, 21.05.2018.

This Personal Data Protection Statement by Adriatic Challenge putnička agencija d.o.o. shall apply from 25 May 2018, and it is based on the General Data Protection Regulation. Throughout this policy, when we write "Adriatic Challenge" or "we" or "us", we're referring to:

ADRIATIC CHALLENGE putnička agencija d.o.o.
Headquarters /Bureau1: Obala K.P.Krešimira IV 38a,
23210 Biograd n/M – Croatia
HR22948168921
Contact e-mail: notification@adriatic-challenge.com

who acts as data collector.

Adriatic Challenge putnička agencija d.o.o. shall process your personal data in accordance with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and national laws based on the said Regulation, with the application of appropriate technical and security measures for the protection of personal data against unauthorized access, misuse, detection, loss or destruction.

General information

This Statement describes what data we collect, how we process them, and for which purposes we use them, as well as your rights associated with your data.

If we use the services of external providers to process your personal data, this is processing (of personal data) by order, in which case we are also in charge of protecting your personal data.

1. Types of personal data we process

We use the following personal data:

- a. Master data: Forename and surname, date of birth, country of birth, nationality, personal identification number, Tax number; depending on the contractual relationship type and content.
- b. Address and contact information data: city, e-mail address, mobile phone number
- c. Other data: type of identity document, number of identity document, date of boarding, port of boarding, name of yacht or boat, number of skipper license, number of VHF license, credit card number, booking number, GPS coordinates of navigation.
- d. When you interact with our Site, we collect Information that, alone or in combination with other data, could be used to identify you ("Personal Data"). Some of the Information we collect is stored in a manner that cannot be linked back to you ("Non-Personal Data").

Other Information we collect

- Automatically collected Information as you use the Site: Certain data about the devices you use to connect with Adriatic Challenge Site, are automatically logged in our systems, including:
 - Location information,
 - Usage information,
 - Device information,
 - Cookies.

- Data collection related to newslettering lists & surveys

Adriatic Challenge collaborates with MailChimp e-mail marketing provider. To be compliant with GDPR we enforce double opt in process of signups to our newsletter group. You always have the right to unsubscribe from our mailing lists as well as ask us to provide you with information when did you subscribe and which lists are you on. Our partner, MailChimp, or rather its system enables such detailed answers.

- We collect personal data from our customers in person, at fairs, via websites, e-mails and by phone or we receive them from other chartering agencies.

The information collected from our clients will not be sold, shared, or rented to other persons or entities in any way.

2. Legal basis and purposes of personal data processing

Your personal data are processed based on:

- a. **Legal obligations** – We process your personal data in accordance with the regulations in force, as well as for the purposes of notification and registration which we are obliged to perform in accordance with the regulations in force (e.g. the Ordinance on the conditions for conducting the activity of chartering of vessels with or without crew and the provision of guest accommodation services on vessels, concluding an agreement on the provision of chartering of vessels).
- b. **Consent** - you have given us to process your personal data for purposes of sending promotional offers and other business-related information, for the purpose of assessing satisfaction after the charter period, and for the purpose of contacting you.

- c. **Fulfilment of agreement** – We process your personal data upon your request, prior to the conclusion of the contract, in order to take action necessary for the contract conclusion.
- d. **Legitimate Interest of the Controller** - your data is processed for the purpose of meeting the obligations of the legislative body (e.g. Ordinance on the conditions for conducting the activity of chartering of vessels with or without crew and the provision of guest accommodation services on vessels) or for fulfilling contractual obligations and concluding agreements, e.g. Agreement on the provision of vessel chartering.
- e. **For the purpose of collecting claims and for contacting the respondent** - personal data shall be deleted over a period of five years after entering into the relationship through the communication channels for which the Company has been granted the consent of the respondent, i.e. by electronic mail (e-mail), social network and in writing (by mail).

3. Retention period

In principle, we shall delete your personal data 5 (five) years upon contract termination but no later than the expiration of any legal requirements related to the retention of personal data.

4. Consent management

You can revoke your consent at any time. You can also, at any time, object to our processing of your personal data.

You can change your consent via a written request at the following address: **ADRIATIC CHALLENGE** putnička agencija d.o.o., Obala K.P.Krešimira IV 38a, 23210 Biograd n/M – Croatia or by e-mail notification@adriatic-challenge.com.

If you revoke the given consent, we will no longer use your data for the said purposes. If you wish to give your consent again, you are able to do so.

Your consent is not required - in the case of processing of your personal data that does not require your consent and that is necessary for the conclusion of an agreement or the fulfilment of the concluded agreement, or due to obligations we have under the law, if you do not provide us with these data, we will not be able to fulfil our contractual obligations towards you, nor will we be able to conclude an agreement with you.

5. Rights of data subjects

- a) **Right to Correction:** If we process your personal data that are incomplete or inaccurate, you may ask us to correct or complete them at any time.
- b) **Right to rectification:** You may ask us to delete your personal data if we have processed them illegally or if that processing represents disproportionate interference with your protected interests. Please note that for some reasons immediate deletion is not possible. For example, due to the archiving obligations laid down by law.
- c) **Right of limitation of processing:** You may request a limitation on processing your data:
 - If you dispute the accuracy of your data during a period that allows us to verify these data.
 - If the processing of your data was unlawful, but you refuse the deletion and instead ask for a limitation of use of this data.
 - If we no longer need the data for the foreseen purposes, but you still need them for the realization of legal requirements or if an objection has been filed for processing these data
- d) **Right to data portability:** You may ask us to transfer your personal information to other subjects in a structured form, in a standard machine-readable format only if we process your data on the basis of your consent or or due to obligations for fulfilment of our agreement and that the processing is done using automated processes.
- e) **Right to object:** If we distribute your information for the purpose of performing a public interest task or a task of public bodies, or when upon the processing of your information we invoke our legitimate interests, you may file an objection against such data processing if there is an interest in protecting your data.
- f) **Right to object to competent authority:** If you believe that upon processing your data we have violated Croatian or European data protection regulations, please contact us to resolve any issues. You are entitled to explanation and to the answer within 15 (fifteen) days from the delivery of the written complaint and inquiries to Adriatic Challenge. You are certainly entitled to file a complaint with the Croatian Data Protection Agency, or in the event of a change of the applicable regulations, with another institution that will assume its jurisdiction, and starting from 25 May 2018 with the supervisory body within the EU.
- h) **Exercise of rights:** If you wish to exercise any of the aforementioned rights, contact us using our contact address notification@adriatic-challenge.com
- i) **Identity confirmation:** In case of doubt we can request additional information to verify your identity. This serves to protect your rights and private spheres.
- j) **Misuse of rights:** If you execute any of these rights too often and with obvious intent of misuse, we may charge you an administrative fee or decline to process your request.

6. Transfer of data to third parties

We shall keep your personal data and shall not disclose them or make them available to third parties except in the following cases:

- If you explicitly and in writing agree to disclose certain confidential data for a particular purpose or to a particular person.
- If the Ministry of the Interior or the competent State Attorney requires the data for the purposes of carrying out the tasks within their competence.
- If a court, attorneys or a notary public require the data for their proceedings, where the submission of such data is required in writing.
- If the Tax Administration, the Croatian Pension Insurance Institute, and Croatian Health Insurance Fund require the data on the basis of the legal obligations that the controller has towards them.
- If we are obliged to submit data to the Ministry of Maritime Affairs, Transport and Infrastructure.

7. Transfer of data to third countries

Transfer of data to third countries (countries outside the EU) is performed only:

- if there is a statutory obligation
- if the transfer is necessary for the fulfilment of contractual obligations
- if you have given your explicit consent

8. Use of digital services (website, applications)

We collect only those personal data that visitors of our official website voluntarily make available to us when submitting contact information, applying for jobs, using call back services, and filing complaint forms. These personal data are used confidentially and only for a specific purpose. The transfer of these personal data to third parties is not carried out, unless there is a statutory obligation or an order of the official body when such personal data may be forwarded to the competent authority. Access to the website is protocolled and technical data such as website traffic, the operating system used, display resolution, time of visit, and the size of the transferred data are recorded on that occasion.

Our websites contains "cookies" to collect usage and analytic data that helps us provide our services to you, as well as to help deliver ads for relevant Adriatic Challenge services to you when you visit certain pages on the Site.

We have taken all technical and organizational measures to protect your data against loss, alteration, or access by third parties. In case you have any questions, please feel free to contact us and we will respond as soon as possible to your requests and queries and help you in exercising your rights.

The Privacy Policy enters into force on 25 May 2018, and is published on the Adriatic challenge official web site www.adriatic-challenge.com

Any changes to our policy on the protection of personal data shall be disclosed in our Personal Data Protection Statement and on our website, and you will be adequately informed about them.

You may contact us with any questions relating to this Privacy Policy by submitting an email on notification@adriatic-challenge.com

Last Edited on 2018-05-21