



# Windseeker Privacy Policy

## 1. Introduction

Your privacy is important to us as you've placed your trust in us by using the Windseeker services and we value that trust. That means we're committed to protecting and safeguarding any personal data you provide to us. We act in our customers' best interest and strive to be transparent about the processing of your personal data. In this privacy policy, it is explained what personal data is, what types of personal data we collect, for what purposes the data is collected, how it is processed and what rights you have in this regard.

## 2. General Principles for Personal Data Processing

We adhere to the following principles when processing your data:

- We will only collect personal data for specified, explicit and legitimate purposes;
- We will not collect personal data beyond what is necessary to accomplish those purposes;
- We only transfer personal data to third parties for the sole purpose of processing your booking;
- When booking a voyage at Windseeker, you give us your permission to use the necessary data;
- We will maintain appropriate technical and organizational measures to protect your data against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access and against all other unlawful forms of processing; and except when stated herein.

## 3. Why And How We Use Your Personal Data

We only collect and use your personal data for the following purposes:

- Processing, organising and completing the booking transaction of your sailing voyage.
- Processing and organising transfers to and from ports, if applicable.
- Processing/organising insurances and special requests, if applicable.
- Providing ships and other approved parties with relevant information on your requests and special needs.
- Providing customer service, handling your (future) requests or complaints and providing support.
- Collecting your feedback regarding your use of the Windseeker and partner organisations' services by inviting you to complete surveys, questionnaires or feedback forms.
- Reviewing visits to our websites and social media for the improvement of our services.

Your data is primarily collected and processed to fulfil our contractual obligations to you. Should you choose not to provide us with the requested and necessary personal data in this regard, we might not be able to satisfy your request/booking. Our data processing is necessary for the legitimate interests pursued by Windseeker, and such processing is not considered to be harmful towards you.

## 4. Personal Data We Collect and Process

When you engage with Windseeker via various channels, including our websites, social media and the customer department, we collect and process your data. The personal data that we collect, and the process can be categorized as follows:

- Your details, such as your email address, name, phone number, address, personal ID-number, passport copy, nationality, date of birth, next of kin, etc.
- Your health details as reported in your health declaration, as well as possible correspondence with one of the ships' physicians.
- Your booking information, such as your details as specified above, dates of your booking(s), such as voyage name, booking date.
- Your payment information, as it is registered on our bank statements.
- Requests for customer support and assistance, containing your details, as specified above, which Windseeker may inquire to proceed with your request.
- Information provided when completing surveys, questionnaires and feedback forms, such as your details, as specified above, your feedback on your use of the Windseeker's service(s) and evaluation of the same; your location information.
- Your browser history collected via the use of cookies and similar technologies like pixels, tags and other identifiers to remember your preferences, to understand how our website is used and to customize our marketing offerings.

## 5. Where We Store and Process Your Personal Data

As a general principle, your data is stored and processed within the European Economic Area (EEA). However, your data may be transferred outside EEA between Windseeker and its authorized third parties, as specified in section 6 within the purposes for which your data was collected.

In case of transfer of your data to any third countries, as defined in General Data Protection Regulation (GDPR), valid law and regulations concerning such transfers are observed, and relevant legal and security safeguards are ensured before such transfer.



## 6. Our Disclosure of Your Personal Data to Third Parties

We do not sell your data or share the data with third parties, except to the extent stated in this Privacy Policy. As a general principle, we only share data, restricted to the minimum requirements, to third parties to facilitate the booking services we provide to you. These include:

- The ship you booked your journey on;
- Event organisations, such as Host Ports, we handle your booking for, if applicable;
- Travel agents to facilitate transfer arrangements, if applied for;
- Insurance agents to facilitate travel insurance, if applied for;
- Other third parties subject to your consent.

Also, we may share your data with the following third parties:

- Contracted third party vendors carrying out services on our behalf, including billing, customer service, service support, shipping, order fulfilment, data storage, validation, security, fraud prevention, payment processing, and legal services. Such third-party vendors have access to perform these services but are prohibited from using your data for other purposes.
- Third parties to establish, exercise or defend legal rights of the Windseeker.
- Third parties in the event of any merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Windseeker's assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

We may disclose your data to third parties to the extent required by law, court order or a decision rendered by a competent public authority and for law enforcement.

When we disclose your data to a third party (such as the ship on which you booked your voyage), we take all reasonable steps possible to ensure that those third parties are bound by confidentiality and privacy obligations concerning the protection of your data. The disclosure is conducted in compliance with legal requirements, including entering into data processing agreements with the relevant third parties, to ensure that personal data is only processed following our instructions, applicable law and regulations and for the purpose specified by us and to ensure adequate security measures.

## 7. Retention of Your Personal Data

We keep your information for no longer than necessary for the purposes for which it is collected. The length of time for which we retain information depends on the purposes for which we collect and use it.

Personal data related to your bookings are kept and processed for five (5) years from the date of last activity. Personal data related to your feedback on our products and services is kept and processed for seven (7) years from the completion date of the given survey, questionnaire or feedback form.

Relevant personal information will be deleted after expiry of the above-mentioned periods unless such data legitimately can be kept and processed for other processing purposes, for which we have a legal basis.

## 8. Cookies

We use cookies and similar technologies to understand how our websites are used.

A cookie is a small text file that is placed on your computer or mobile device when you visit a site, that enables us to: (1) recognize your equipment; (2) store your preferences and settings; (3) understand what web pages of Windseeker you have visited; (4), enhance your user experience by delivering and measuring the effectiveness of content tailored to our visitors interests; (5) perform searches and analytics; and (6) assist with security and administrative functions. Some cookies are placed in your browser cache while those associated with Flash technologies are stored with your Adobe Flash Player files.

As we adopt additional technologies, we may also gather information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser for more information. You can also manage the use of Flash technologies, including flash cookies and local storage objects with the Flash management tools available at Adobe's website. Please note that by blocking, disabling, or managing any or all cookies, you may not have access to specific features or offerings on our websites.

## 9. Responsible for Processing

Windseeker, Marinierskade 58, 1018 HZ, Amsterdam is the data controller and is responsible for the processing of your data. Windseeker is registered in The Netherlands and operates under Dutch law and regulations.

## 10. Your Rights

You have right to access and receive the personal data concerning yourself, which you have provided to Windseeker.



Should you wish, we encourage you to update your data provided to Windseeker any time there are changes in your data. This can be done by contacting Windseeker.

Your data can be deleted from the Windseeker servers by Windseeker upon request unless the Windseeker is entitled or obliged by applicable law and regulations to keep and process such information regardless withdrawal of your consent.

Some of Windseeker's processing activities may be based on your individual consent. In such case, you will have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of processing conducted prior to the withdrawal.

If you withdraw your consent, Windseeker and third parties involved in personal data processing will cease to process your personal data, unless and to the extent the continued processing or storage is permitted or required according to the applicable personal data legislation or other applicable laws and regulations. Please note that as a consequence of the withdrawal of your consent, Windseeker may not be able to meet your requests, provide booking information or provide you with our services.

If you want to report a privacy breach, please contact Windseeker by sending your report to the contact details provided at the end of this agreement.

If you are not satisfied with the outcome of your complaint or with the handling of your report to Windseeker, you may refer same to the official Dutch authorities: Autoriteit Persoonsgegevens, Bezuidenhoutseweg 30, 2594 AV, Den Haag, The Netherlands.

Websites and services of Windseeker may contain links to third party's websites, please note that Windseeker does not collect or process any sound recordings on its behalf, but only makes available third-party services.

If you choose to use these websites, plug-ins or services, you may disclose your information to those third-parties. Windseeker is not responsible for the content or practices of those websites, plug-ins or services. The collection, use, and disclosure of your data will be subject to the privacy policies of these third parties and not this Privacy Policy. We urge you to read the privacy and security policies of the relevant third-parties.

### **11. Data Security**

Windseeker is committed to protecting the security of your data. We use necessary organizational, technical, and administrative measures to protect your data under control of Windseeker, such as control of access, transmission, input, and availability and the separation of data.

Your personal details and your credit card details, if you have provided such to Windseeker, remain encrypted on Credit Card Company ICS's secure web servers. Credit card information is directed to one or more approved and certified service provider(s).

All data storage and processing at computer facilities of Windseeker as well as at business partner facilities are subject to written data processing agreements.

### **12. Changes to Our Privacy Policy**

Windseeker may modify or update this Privacy Policy when necessary to reflect changes in the Windseeker products and services, changes in applicable legislation, regulations or practice and to address customer feedback.

If there are material changes to this Privacy Policy, we will notify you either by posting a notice or by sending you a notification.

### **13. Contact Details**

If you have questions about this Privacy Policy or Windseeker's processing of your data, please contact us at:

Windseeker

Visiting Address:

Marinierskade 58  
1018 HZ Amsterdam  
The Netherlands

Email: [info@windseeker.org](mailto:info@windseeker.org)

Phone: +31-6-82790115

Post address:

Po Box 16664  
1001 RD Amsterdam  
The Netherlands