

## **PERSONAL DATA PROTECTION POLICY**

The personal data policy of "KIRIACOULIS MEDITERRANEAN CRUISES SHIPPING S.A." (hereinafter "Company") is addressed to the user/visitor when they:

- navigate the Company's website,
- communicate with the company on matters concerning the Company or the Website,
- receive updates from the company about promotional activities.

This Policy should be read in conjunction with the Terms & Conditions of the Company's website, as these texts are an integral part of this Policy. Any use of the website presupposes that the visitor has read this Policy and consents to the way we process personal data, as well as has read and accepted the aforementioned texts.

By navigating the website, the visitor automatically and unreservedly accepts the terms of this Policy with its current modifications. The company reserves the right to modify the terms without notifying the user/visitor, and for this reason, it is recommended that the user/visitor check the above at regular intervals for any changes. In case of disagreement or reservation, in whole or in part, with the modifications, the company requests that you refrain from any use of the website; otherwise, acceptance is presumed to be unconditional.

### **1. Data Controller & Contact Information**

**1.1.** A "Data Controller" is considered to be any natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. When the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. The Data Controller for the personal data of this website is " KIRIACOULIS MEDITERRANEAN CRUISES SHIPPING S.A.".

**1.2.** Contact Information: For any matter concerning this Data Protection Policy and the processing of your personal data, you can contact the Company by sending an email to e-mail [privacy@kiriacoulis.com](mailto:privacy@kiriacoulis.com).

### **2. What is personal data?**

"Personal data" is any information relating to the data subject, such as: their name and profession, family status, age, place of residence, racial origin, political opinions, religious beliefs, philosophical views, trade union membership, health, sex life, and any criminal prosecutions and convictions, in accordance with the provisions of the General Data Protection Regulation (GDPR 2016/679/EU), the applicable Greek

legislation, and the decisions of the Hellenic Data Protection Authority (HDP), as well as the directives and decisions of the competent European bodies. Specifically, this is information collected either from the Visitor when they enter it in specific fields of the Website or in an automated way during navigation.

Examples include:

- Entry of personal data by the Visitor for communication with the Company.
- Provision of data in the context of participation in promotional activities (subscribing to the Newsletter).
- Acceptance of the use of tools such as cookies or other technical means to customize your Browse experience on the website. For more information on the management of your personal data through cookies, please see the relevant section.

### **3. Data Collection:**

The Company collects the following personal data of the Visitor, if declared:

#### **Declared directly by the Visitor:**

- **Identity & contact data:** name, surname, country, e-mail, telephone, and the content of the respective request, as entered by the Visitor.
- **Newsletter subscription data.**

Provision of consent by entering the Visitor's details in the field for subscribing to the newsletter, in order for the Company to send newsletters and updates to the Visitor.

#### **Data collection from third parties:**

When you use third-party providers to connect to our Website and use our services (e.g., Facebook, Viber, Google), data may be collected, following your information and consent. In this case, the company suggests that the user/visitor refer to the relevant section of the third-party providers regarding their terms of use and personal data protection policies.

#### **AUTOMATED Collection:**

We collect certain Technical Data and data via cookies, such as: Internet Protocol (IP) address, operating system, statistical/pseudonymous data, time zone and location, browser type and version, and other technologies that may be required to access the Website), the devices through which you visit the Website, data about the page from which you connected or the page you went to when you left, your preferences (duration and frequency you view certain products, the type of Newsletters you open or not). More details can be found in our Cookies Policy.

### **4. Purposes of processing**

- a. Identity & contact data: the information entered in the contact form with the Company in order to communicate with the Visitor for the processing of their request.
- b. Management of Website visitor service requests: The user/visitor, depending on their respective request, voluntarily provides the information they deem necessary for their service.

The processing of data provided by the user/visitor is based on the following legal bases:

- a) compliance with the Company's legal obligation to adopt tools/means for serving the users of the Website.
- b) where deemed necessary, the consent of the user/visitor for effective communication with the Company to serve users/visitors, following a relevant request. The user/visitor can withdraw their consent at any time by sending an e-mail to the contact details above.

The company may process the above data on the basis of its legitimate interest or its compliance with a legal obligation when we receive documents, requests, orders, briefs, warrants, etc., from legitimate authorities or bodies, such as supervisory, prosecutorial, judicial, and tax authorities, for the investigation of crimes and your protection against fraud or the fight against all forms of crime and infringement of legal rights.

Furthermore, the company collects data via cookies for purposes such as technical control, quality and performance monitoring of our Website, and improvement of functionality and advertising. For more information regarding how data collected via cookies is processed, please refer to the relevant section on the Cookies Policy.

## **5. Retention period of personal data**

**5.1** The Company retains personal data for as long as the visitor interacts with the company and as long as it is necessary for the fulfillment of the processing purposes described above. The visitor is entitled to request the deletion of all personal data held on the basis of the aforementioned website, unless the retention of some of it is imposed by a legal obligation or to support a legitimate right of the Company. In any case, the data is deleted immediately after the fulfillment of the purposes for which it is kept.

### **5.2** Indicative retention periods for personal data:

Customer and Website visitor service: The information provided by the visitor when submitting a request is stored in the website's database and is kept for as long as required by the nature of the request submitted, and in any case for at least 6 months from the submission of the latest information.

**5.3. Commercial Communication:** The retention of data for promotional purposes ceases upon the visitor's withdrawal of consent or objection to the sending of commercial communication by the Company, or up to 1 year from the last time they interacted with the website in any way (e.g., new request, newsletter).

## **6. User/Visitor Rights**

**6.1.** The Website Visitor can exercise the rights listed below by sending an e-mail to [privacy@kiriacoulis.com](mailto:privacy@kiriacoulis.com).

A. **Right of access:** The user can request to receive relevant information about the processing of their data, such as: what data the Company holds, why it uses it, to whom it transmits it, if it transmits it to third countries, how it protects it, where the Company collected it from if not from you, how long it keeps it, what rights you have, how you can file a complaint, etc..

B. **Right to Rectification:** The user is entitled to request the Company to correct false or inaccurate data or to update it. In this context, our Company reserves the right to verify the accuracy of the data before correcting it and is obliged to inform the recipient to whom the personal data was disclosed, unless this proves impossible or involves a disproportionate effort.

C. **Right to Erasure:** The website visitor has the right to have their data deleted in the following cases: i) withdrawal of their consent for the processing of their data, ii) in case of unlawful processing or submission and processing in a manner other than that provided for, iii) their retention is no longer necessary for the purposes for which they were collected. The Company reserves the right to refuse the exercise of the above right if the processing of the data is necessary (a) for the purpose for which it was collected, (b) for compliance with a legal obligation, (c) for the establishment, exercise, or defense of legal claims. Upon termination of contracts with the company, the user can also request the deletion of their Account and data. The deletion will take place when the above conditions are met.

D. **Right to Restriction of processing:** The Visitor may request the company to exclusively keep their data and not process it when: the accuracy is disputed ; the processing is unlawful but they do not wish for its erasure ; the processing of the data is no longer necessary for the purposes for which it was collected, but the Company still needs it for the establishment, exercise, or defense of legal claims ; they object to its processing and await verification of its outcome, i.e., whether our Company's legitimate grounds override those of the user.

E. **Right to Data Portability:** The user is entitled to request data in a structured format or its direct transfer to another data controller. The conditions for exercising this right are (a) the data was provided with consent or in the context of a contract execution, (b) the data is kept by automated means and not in paper form, and (c) it was provided by you and is not data inferred by our Company based on the data the user has provided.

F. Right to Object: The user is entitled to object to the processing of personal data, which has as its legal basis (a) a legitimate interest, (b) the performance of a duty, (c) the case of profiling. If the user exercises this right, the Company reserves the right to continue processing the data if there are compelling and legitimate reasons that override the user's rights and freedoms or that relate to the establishment, exercise, or support of legal claims for the continuation of said processing.

H. Withdrawal of consent: The user has the right to freely and at any time withdraw their consent where consent is provided as the basis for processing. The withdrawal of consent is effective for the future, and any processing carried out by the Company up to the point of withdrawal is lawful.

I. Right to human intervention: For cases where the company informs that it uses certain technical means for the automated processing of data, without human intervention, the user can request human intervention in decision-making through automated processing.

**IA.** For any issue that arises, the user can contact the company by phone or by sending an e-mail. The user can contact the competent supervisory authorities to submit complaints or grievances regarding the processing of their data. In Greece, the supervisory authority for data protection is the Hellenic Data Protection Authority ([www.dpa.gr/](http://www.dpa.gr/)).

## **7. Third-party recipients of user data**

**7.1.** To fulfill the requests of the Website Visitor and for its proper operation, the Company cooperates with third-party providers who gain access only to the data that is absolutely necessary for the processing of the tasks assigned to them. The following purposes are mentioned as examples: a. Processing of requests, b. Advertising and marketing (e.g., for sending newsletters).

**7.2.** The third parties collaborating with the Company are committed to maintaining the confidentiality of the user's personal data transmitted to them by us, as well as to taking all technical and organizational measures for secure processing and not using the information in any way other than for the fulfillment of the specific purposes mentioned above.

**7.3.** The data kept may be disclosed to the competent judicial, police, and other administrative authorities upon their legal request and in accordance with the applicable legislative provisions. Furthermore, in the case of a legal order, official order, or official preliminary examination, the Company has the right, without further ado, to make the relevant information available to the respective service.

**7.4.** We reserve the right to disclose your personal data to a third party to whom we may choose to transfer all or part of our business. Furthermore, in the event of a merger or acquisition, or other change in our business, the new owners, shareholders, managers, etc., have the right to use your personal data in the same way as defined in this Policy.

**7.5.** During the transfer of personal data, the highest possible level of security is continuously ensured. The Company generally keeps your personal data within the European Economic Area (EEA). In case data is to be transferred to third countries outside the European Economic Area for which there is no adequacy decision from the European Commission, or to International Organizations, all appropriate safeguards provided for in the applicable legislation and in the decisions and directives of the competent European bodies for the protection of personal data regarding transfers to third countries will be taken, and the relevant information will be posted on the company's website.

## **8. Data Security**

**8.1.** The Company takes all necessary technical and organizational security measures to protect and ensure the confidentiality of your personal data (e.g., Firewalls, Antivirus, Access rights control, PCI Security Standards, Service Organization Control (SOC), special software to deal with malicious actions and reCAPTCHA, to certify that access to specific fields of the Website is not carried out by a bot).

**8.2.** To carry out the processing of user data, the Company selects persons with corresponding professional qualifications who provide sufficient guarantees in terms of technical knowledge and personal integrity for maintaining confidentiality. The Company, through corresponding contractual commitments and its partners, takes all necessary security measures to protect and ensure the privacy, confidentiality, and integrity of personal data. In any case, their security in the platform environment is subject to events beyond its sphere of influence, as well as errors due to technical or other network weaknesses not controlled by the Company, or reasons of force majeure or fortuitous events.

**8.3.** You must not disclose your account access details and must safeguard against unauthorized access to it by third parties.

## **9. Changes to the Personal Data Protection Policy**

The company reserves the right to modify the Personal Data Protection Policy to comply with the applicable Greek and European legislation or in case of a revision of our procedures or practices. Users will be informed of changes to the Data Protection Policy by its publication on the Website. It is noted that any information or clarification provided in accordance with the above does not constitute a replacement, substitution, or any modification of this Policy.