

# LUCIOLE

## Privacy Policy

References to “We”, “Us”, or “Our” in this privacy notice, mean the data controllers Inland Voyages Limited and Inland Voyages (Bookings) Limited, who determine how (and for what purposes) your personal data is used.

Your privacy is important, we are open about how we use personal data, the information that identifies you as an individual. In this privacy policy you will find information on:

- What information we may collect about you
- What we may do with it
- What your rights are.

We need to use your personal data to give you the best possible onboard experience. When you book with Us, we need your personal data to deliver a great cruise vacation, for customer service purposes and where required by law

By using our website, you are agreeing to this policy and consent to our use of cookies in accordance with the terms described below.

We are responsible for the personal data you provide to Us. We value the security of personal information and take measures to protect your personal information and data. Except as provided in this policy, we will not provide your personal information to third parties. We will only share such personal data with Inland Voyages Ltd and Our Suppliers and Business Partners if We have a legitimate reason permitted by law, such as your consent

## Collecting personal information

We may collect, store and use the following kinds of personal information:

### **Personal, contact, ID and payment details**

Your full name and contact details (first name, middle name, last name, nickname, suffix, email address, phone number, postal address, country of residence, emergency contact details), age, date of birth, gender, passport details, photograph, video footage (including CCTV footage), visa details, dietary requirements, nationality, marital status, country of birth, payment card details and any publicly available content on social media platforms.

### **Sensitive personal data**

We may collect details relating to your health or medical conditions, including details of any accessibility requirements, allergies, or other health-related requests. We also may collect details about allergies or other dietary requirements, which may potentially indicate your religion or beliefs

### **Your photograph and your image**

We may collect a photograph of you during your cruise, this may be used for limited marketing use on our web platforms and social media.

### **Booking records**

Details of past and future bookings with Us (including booking ID, date of cruise, passengers on your booking, destination, duration, price paid, cabin information and the date of booking)

### **Your marketing and data processing preferences**

Whether you want to receive marketing communications from Us and how you would like Us to contact you.

### **Technical information related to use of and visits to Our Digital Platforms**

Details about the browser, device and internet connection that you use when you browse Our Digital Platforms, technical information, including your IP address, MAC address, browser type and version, time

zone setting, browser plug-in types and versions, operating system and platform. For example, Our Digital Platforms can tell whether you are using a mobile phone or a desktop computer. The full web addresses that you access, your path of clicks, through and from Our site (including date and time and whether you used a search engine), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call Our customer service number.

### **Cookies**

Our Digital Platforms store small text files on your device that identify your browser

### **Interactions with Our emails**

We use elements embedded in Our emails (e.g., images and clear images) that let Us know whether you have opened or read an email. If you follow links in Our emails, We may also set cookies on your system if you have enabled cookies. This information also tells Us about your propensity to engage with Our emails.

## **How we collect your information**

You provide some of these details to Us if you:

- Book a cruise
- Sign up to receive Our emails
- Use, visit or interact with Our Digital Platforms, including Our social media accounts.
- Contact us.
- Tell Us about medical conditions when you book with Us.
- Where you book with a travel partner, We may receive these details
- If another person books a cruise or contacts Us on your behalf
- We may also receive video footage of you if required
- Open and interact with email that We have sent you, including opening an email (unless you have opted out). We compile information about how you interact with Our emails from Our profiling and personalized marketing activities

We compile this personal data from Our records when you book with Us.

We also receive this personal data from Travel Agents if you book with them.

We retain your personal data only for as long as necessary.

### **Acting on someone else's behalf**

If you give Us information about another person (or persons), such as another guest, We will understand this to mean that they have appointed and authorized you to act on their behalf, including multi-guest reservations such as a group booking or charter. This includes providing consent (to the extent this is required) to:

- Us processing their personal data and
- You receive any information protection notices on their behalf.  
We may ask you to provide evidence that you have been appointed and authorized to act on behalf of the other person (or persons)

### **Children**

Our Digital Platforms seek to promote Our cruise vacations for sale to adults. We do not knowingly solicit personal data from children, unless permitted by applicable law. If a parent or guardian becomes aware that his or her child has provided Us with information without their consent, he or she should contact Us using the contact details below. We will delete such information from Our files.

## **Using personal information**

We are responsible for the personal data you provide to us and will only share such personal data with Inland Voyages Ltd, its subsidiaries and Our Suppliers and Business Partners if We have a legitimate

reason permitted by law, such as your consent. All our website financial transactions are handled through our payment services provider, Barclaycard Business.

## **How We use your personal data and who We share it with**

We use your personal data to:

- Provide the best customer service possible.
- Supply and deliver the services you purchased through our website
- Manage your bookings and to provide the services you request before, during and after your cruise.
- Send statements, invoices and payment reminders
- To process payments and invoicing when you make a purchase through the Digital Platforms we will process your payment details to process the transaction.
- Administer our website and business
- Send you non-marketing commercial communications
- Send you email notifications that you have specifically requested
- Send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter)
- Send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications)
- Provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information)
- Deal with enquiries and complaints made by or about you relating to our website
- Improve the content and use of Our Digital Platforms, including keeping them secure and preventing fraud
- Verify compliance with the terms and conditions governing the use of our website
- Keep you safe. For example, we transfer a record of the personal data you provide during the booking process if during the cruise you require emergency assistance.
- Manage your relationship with Us as a consumer and to deliver personalized service and to personalize the marketing communications that We send you. We also sometimes use your details to ask for feedback on Our services.
- Comply with legal obligations
- Manage business activities, including to assist with incident management and to enable Us to conduct reporting. Reports help Us to monitor Our performance and the performance of Our Suppliers. Additionally, We keep records to assist with any complaints you may have or in the event of a legal claim. We also process your feedback to improve Our products and services.
- Verify compliance with the terms and conditions governing the use of our website

## **Disclosing personal information**

Except as provided in this policy, we will not provide your personal information to third parties.

We may disclose your personal information to any of our employees, professional advisers, agents, suppliers or subcontractors, as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information to any member of our group of companies (this means our subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.

We may share your personal data with the following recipients for the purposes listed above:

- Other subsidiaries of Inland Voyages Ltd, including Inland Voyages (Bookings) Ltd for the purposes above.
- Travel partners When you book through a travel agent We may need to send details of your booking to that partner. Travel partners may make decisions themselves about how and why to process your information, or they may or may not process your information on Our behalf. Our privacy notice will not cover the information collected by travel partners and it will not cover how travel partners use

that information. We recommend that you check your travel partner's own privacy policy for details as to how they may process your personal data.

- Our Suppliers We use products and services from Our Suppliers in the operation of Our business.
- Our Business Partners We partner with companies, such as tour operators, to complement the products and services that We provide to you.
- To the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling
- Government authorities, law enforcement agencies, courts, and parties to litigation We may need to share your personal data where required under law. Law enforcement agencies may require access to personal data, including in connection with criminal investigations, or We may be ordered to disclose personal data by a court or in connection with legal proceedings, including fraud.
- Other third parties We may share your personal data with other third parties at your request. Our Digital Platforms may provide links to websites or other digital tools that We believe may be useful to you in addition to advertisements placed by third parties. These may lead you to websites or digital tools operated by third parties operating under their own privacy policies. We encourage you to review those privacy policies, as We have no control over those third parties nor the information you may submit to those third parties.
- Your health and safety is important to us. We may share personal information with third parties or individuals if we reasonably believe in good faith that such action is necessary to protect the personal safety or health of our guests, crew, family members or other individuals. For example, we may disclose your personal identifiers and medical information if you require medical assistance or if we believe that such disclosure is reasonably necessary to inform health care and we may disclose similar information to your family members and emergency contacts, insurance providers, medical providers and family assistance companies in the event of health or safety incident. We may also disclose personal identifiers and health or medical information to our personnel and contractors and authorities, government officials, health agencies or any other individual or institution as reasonably needed to support public health initiatives, comply with our legal or regulatory obligations, attend to your medical and safety needs, facilitate investigations and remedies, track and mitigate risks of communicable illness including COVID-19, and to protect the rights, health and safety of our guests, crew, and others.

## Security of personal information

- We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- All electronic financial transactions entered into through our website will be protected by encryption technology.
- You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet

### **International data transfers**

We may need to share or transfer your personal data outside of the EEA (including to the United States) Sometimes transferring your personal data outside the EEA will be necessary for Us to perform Our contract with you (e.g., to provide your cruise). We use the European Commission's standard data protection clauses (also known as Model Clauses) to provide safeguards for your personal data that is transferred outside the EEA so you can rest assured that We seek to adhere to the strict European standards of data security and usage.

## Amendments

We may update this policy from time to time by publishing a new version on our website.

In the event We are involved in a merger, acquisition, or sale of all or a portion of Our assets, we aim to notify via email and/or in a prominent notice on Our Digital Platforms of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

## Your rights

In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

### Third party websites

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties

You have the right to ask Us to:

- a. provide you with access to the personal data that we hold about you;
- b. correct your personal data;
- c. erase your personal data;
- d. restrict our processing of your personal data;
- e. object to our processing of your personal data;
- f. request that we move your personal data to another organization; or
- g. object specifically to us using your personal data for profiling for direct marketing purposes
- h. make a complaint about how We process your personal data to your data protection supervisory authority.

Where you have specifically consented to Our use of your personal data, you have the right to withdraw that consent at any time. Please contact Us if you want to do this. See Our website for contact details.

## Cookies

Our website uses cookies.

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use both session and persistent cookies, and other technologies to collect information on Our web pages for a variety of purposes, such as to improve the design and content of Our website and to enable Us to provide a more personalized experience when you browse the Internet. We also use cookies for advertising and targeted tracking purposes, which aims to improve the relevance of the advertisements you see. For example, after you visit Our website you may be shown advertisements relating to Our services and products on third parties' websites.

Most web browsers have an option that allows you to turn off all cookies or have your computer inform you each time that a request to place a cookie is being made. If you turn cookies off (or refuse to accept a request to place a cookie), you may not have access to some features on Our websites and some of Our

services, such as purchasing a cruise. We also might not be able to remember your preferences, including in relation to marketing materials on Our websites, without using cookies.