

NAVIGARE YACHTING PRIVACY NOTICE

(ID:#3616-31-10682-2023)

1. INTRODUCTION

1.1 The purpose of this privacy notice is to provide information on how Navigare Yachting ("Navigare" or "we") processes your personal data in connection with fulfilling the obligations and rights arising from our business relationship in accordance with the agreements we enter into with you as well as in connection with your interaction with us in respect of your yacht and its use in charter and when we are marketing and informing about our business.

1.2 We respect your privacy and duly protect the personal data we process about you. All processing of personal data is carried out in accordance with the European Union's General Data Protection Regulation (the "GDPR"). The following describes, among other things, how we collect, process and share your personal data.

2. WHAT PERSONAL DATA WILL BE PROCESSED?

2.1 We will collect and process the following personal data about you (your "Personal Data"):

- Contact information (e.g. name, address, email address and telephone number);
- Personal identity number and nationality;
- Copy of passport or other personal identification documents;
- Financial information (e.g. income in relation to the yacht, bank account details, payments, information about assets, debts and other information provided in your financial CV);
- Ownership of the yacht and other information regarding the yacht (e.g. location);
- Information relating to the management of the yacht (e.g. insurance information); and
- If relevant, your bookings of yachts and travel information (e.g. flight reservations etc.).

2.2 As a general rule, we will only collect the Personal Data directly from you. Yet, some financial information such as your income in relation to the yacht will be calculated based on payments from and to third parties. The provision of your Personal Data is necessary to enter into and fulfil the Agreements. If you do not provide your Personal Data to us, we will not be able to fulfil our obligations under the Agreements.

3. WHAT ARE THE PURPOSES OF PROCESSING YOUR PERSONAL DATA?

We process your Personal Data for the following purposes ("Purposes"):

1. In order to fulfil our obligations under applicable laws regarding e.g. tax and accounting obligations;
2. In order to fulfil the Agreements with you, including but not limited to, to administrate payments, provide regular notices regarding your yacht, and administrate charters and maintenance services;
3. If applicable, in order to fulfil our obligations in accordance with the terms and conditions for Navigare Holiday Programme;
4. If applicable, in order to represent you, administrate contact with and provide relevant information to the relevant bank for the purpose of making available financing of your investment;
5. In order to communicate and send you relevant information and marketing material by post, email and SMS; and
6. In order to personalise information and marketing offers. This entails that we use your Personal Data, such as the location of your yacht, your yacht's value and income in relation to your yacht, to adapt and personalise marketing material and information in order to suit your specific needs.

4. WHAT ARE THE LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA?

4.1 The processing of your Personal Data for Purpose 1 above is based on that we are under a legal obligation to process your Personal Data to report to authorities and banks in accordance with applicable laws and regulations.

4.2 The processing of your Personal Data for Purposes 2 and 3 above is based on that the processing is necessary for us in order to fulfil our obligations under the Agreements and the terms and conditions for Navigare Holiday Programme.

4.3 The processing of your Personal Data for Purpose 4 above, provided that you choose this service, is based on our agreement with you to facilitate your investment by contacting the relevant bank and provide the bank with requested information that is used to e.g. assess your credit rating. We only process the Personal Data in case you ask us to provide assistance in this regard and you may always choose to administrate any financing on your own.

4.4 The processing of your Personal Data for Purposes 5 and 6 above is based on our legitimate interest to inform about and market our services and products. Marketing is a crucial part of our business and we always strive to provide you with marketing material that is relevant and interesting for you. We will not create extensive personal profiles and the processing is conducted manually and, thus, we do not use any system or service provider to compile the Personal Data. Based on the Personal Data collected, including the location of your yacht, your interactions with us (such as your bookings), your financial information (such as the value of your yacht and other finances connected to Navigare such as income in relation to your yacht), we adapt the offers and assess which offers that might be relevant for you. As an investor, we believe that you are interested in our business and that you prefer that we try to personalise our offers to you as much as possible. This Personal Data will only be processed by us for these Purposes and any third party that gains access to this data only process it based on our instructions. We always ensure to not use more Personal Data than needed in order to fulfil such Purposes and the Personal Data is stored securely with limited access. However, you always have the right to object to the processing of your Personal Data for these purposes and if you do we will immediately stop processing your Personal Data for these purposes. In each marketing email or SMS we send you, we will include an unsubscribe link that you can use if you do not wish to receive any marketing from us. Based on the above mentioned factors, we have conducted a balancing interest test with the result that we believe that your interest in not having your Personal Data processed for these Purposes does not override our legitimate interest to send marketing and personalise our marketing and information.

4.5. In certain cases, the processing for Purpose 5 is based on your consent that is given separately. This is the case when we or other Navigare Group companies would like to send you marketing material regarding services and products offered by such other Navigare companies. You can withdraw your consent at any time by contacting us via the contact information stated in section 7 or use the unsubscribe link provided in the marketing material we send you.

5. WHO HAS ACCESS TO YOUR PERSONAL DATA?

5.1 We have implemented appropriate technical and organisational security measures to protect your Personal Data against loss, accidental and unlawful access and unauthorised disclosure. The number of persons with access to your Personal Data is limited. Only individuals associated with Navigare who need to process your Personal Data in accordance with the Purposes above have access to your Personal Data and will be obliged not to use it for any other purpose.

5.2 We may share your Personal Data with other entities within Navigare Group, in order to provide you with relevant information and marketing regarding the business in our group companies. Furthermore, Personal Data may also be shared with potential investors and owners of Navigare.

5.3 In addition, we share your Personal Data with suppliers and partners that carry out services on our behalf or in other ways collaborate with us, including our IT-providers of our booking system, customer relationship management system, book-keeping system, email system, system for signing and sending agreements, cloud storage, development system, team communication system, charter booking and management system, and provider of marketing services, our payment acquirer, yacht manufacturers, banks involved in transactions and insurance companies. These collaboration partners are established in countries such as Sweden, the US and in the countries where your yacht is located.

5.4 Your Personal Data will be transferred to countries outside of EU/EEA, including the US, which may have a lower level of protection than within the EU/EEA. When transferring Personal Data to countries outside the EU/EEA, we use standard contractual clauses approved by the European Commission as well as necessary supplementary measures to ensure a sufficient level of protection for your Personal Data. The standard contractual clauses can be found via the following link: https://ec.europa.eu/info/strategy/justice-and-fundamental-rights/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en.

6. HOW LONG IS YOUR PERSONAL DATA STORED?

Your Personal Data will only be stored as long as necessary for the Purposes for which it was collected or as long as permitted or required under local law. This means that your Personal Data will generally be stored as long as the Agreements are in force, but certain Personal Data, such as Personal Data relating to your purchase, will be retained longer in accordance with applicable laws, such as accounting laws. Furthermore, the Agreements as such and the Personal Data included therein will be stored for a period of 7 years after the termination of the Agreements in order to defend and administrate potential claims and for internal archiving purposes. The information included in your financial CV will only be stored until you become the registered owner of the yacht and the Personal Data used for marketing purposes will be deleted immediately after you have objected or withdrawn your consent.

7. WHAT ARE YOUR RIGHTS?

7.1 The Navigare Yachting entity that you enter into the Agreements with ("Relevant Navigare Entity") is the data controller of the processing of your Personal Data. You can find contact information with respect to each Navigare Yachting entity here: navigare-yachting.com/en/charter/privacy-policy. Navigare Properties entity here: <https://navigare-properties.com/privacy-notice/>. You may always contact us via the following email address info@navigare-yachting.com. However, in relation to processing of your Personal Data for marketing purposes, the Relevant Navigare Entity and Navigare Yachting AB will be joint controllers and in certain cases it can also be any Navigare Properties entity that is the controller of the Personal Data. Furthermore, if you participate in the Navigare Holiday Programme it will be the Navigare Group entity providing the service that you choose when using the benefits of the programme that is the controller of such Personal Data. This means that we and the other entities mentioned are responsible for your Personal Data being processed correctly and in accordance with applicable laws. In the below, we have summarised your rights in relation to the Personal Data we process about you:

- You have the right to know what Personal Data we are processing about you, and you can request a copy of such data.
- You have the right to have incorrect Personal Data about you corrected, and in some cases you may request that we delete your Personal Data (e.g. if your Personal Data is no longer necessary in order to fulfil the Agreements).
- You have the right to object to certain processing of your Personal Data, for example in relation to processing for direct marketing purposes, and request that the processing of your Personal Data be limited. Please note that limitation or deletion of your Personal Data may result in us not being able to contact you or fulfil our obligations under the Agreements.
- Under certain circumstances you also have the right to extract your Personal Data in a structured, commonly used and machine-readable format and to transfer the Personal Data to another controller.
- If you have given your consent to processing of your Personal Data for an explicit purpose you may at any time withdraw your consent. Please contact us at the information above if you wish to withdraw your consent.

7.3 If you have questions regarding how we process your Personal Data or wish to exercise any of your rights, you are most welcome to contact us at the contact information stated above.

7.4 If you have any objections or complaints about the way we process your Personal Data, if applicable, you have the right to file a complaint with the Swedish Data Protection Authority at Drottninggatan 29, Stockholm, Sweden or datainspektionen@datainspektionen.se or contact the supervisory authority of your own choice, the relevant supervisory authorities can be found here: <https://www.cnil.fr/en/data-protection-around-the-world>.

8. CHANGES

If any changes are made concerning the processing of your Personal Data, we will inform you of the changes by sending you an email with an updated version of this privacy notice.