

PRIVACY POLICY

Last updated: May 01, 2023

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use the Service and tells you about your privacy rights and how the law protects you.

We use your personal data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy.

1. DEFINITIONS

For the purposes of this Privacy Policy:

Account means a unique account created for you to access our Service or parts of our Service.

Affiliate means a legal entity that controls, is controlled by or is under common control with a party, where “control” means ownership of 50% or more of shares, equity interest or other securities entitled to vote in the election of directors or other governing body.

Company (referred to as either “the Company”, “We”, “Us” or “Our” in this Agreement) refers to DRUSTVO SA OGRANICENOM ODGOVORNOSCU "CENTER CRUISES", Montenegro, Tivat, bb Belani, registration number: 5- 1044489 / 001.

Cookies are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

Country refers to Montenegro.

Device means any device that can access the Service such as a computer, a cellphone or a digital tablet.

Personal Data means any information that relates to an identified or identifiable individual.

Service refers to the Website.

Service Provider means any individual or legal entity who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.

Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

Website refers to cruises of the Centre, accessible from <https://center.cruises/uk/>

You means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

2. COLLECTING AND USING YOUR PERSONAL DATA

Types of information collected

2.1. Personal Data

While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

Personal identifiers such as your name, email address, mailing address, phone number, date of birth or similar identifiers.

Customer records such as your identification documents, payment information (credit or debit card or other financial information).

Commercial information such as your travel history, account data, participation in a loyalty or rewards program, or information about the products or services purchased or considered.

Sensory information such as photos and videos of you and audio recordings of phone calls between you and us, where permitted by law.

Biometric information, including facial identifiers that can recognize you from photos and video.

Preferences you provide to us or generated through your use of the Services, including inferences we may make based on our experience with you.

Internet, network and device information from the browser or device you use to access our Services, which could include your IP address, device ID, cookie identifiers, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and or clickstream data.

Geolocation data including precise geolocation data from your browser or device or inferred based on your IP address.

Professional Information you submit when you apply for a job opening or in connection with your role as a travel partner or agent.

Background check information that we may receive from third-party sources, such as criminal and sex offender registry information.

When You Provide Personal Information to Us

Registration & Profile. If you register for an account through our Services or complete your traveler profile, we collect your personal identifiers, customer records, commercial information and, if you provide it, information about health or medical conditions. We use this information to create and administer your account, provide you with the relevant Services and information, communicate with you regarding your account and your use of the Services, provide rewards and loyalty program perks, for customer support purposes, and to send you marketing

communications by email, push notification, or by text message, in accordance with your preferences.

Travel Bookings & Orders. If you book travel with us or order additional products or Services, we collect a variety of information, including your personal identifiers, customer records, commercial information and, if you provide it, information about health or medical conditions, as well as any other information you choose to provide to us. We use this information to process your transaction, complete and ship your purchase, book and confirm your travel itinerary, communicate with you and those travelling with you about your itinerary and to administer the Services.

Inquiries & Communications. If you communicate with us or other guests through any paper or electronic form to request an itinerary, deck plan, brochure, ebrochure or video, or to otherwise inquire or communicate with us or other guests, we collect your personal identifiers, commercial information, and any other personal information you choose to provide in the content of your message. We use this information to investigate and respond to your inquiries, to facilitate communication with us and the other guests, to provide you with requested information, to enhance the services we offer to our guests, and to manage and grow our business. If you represent a company or agency interested in partnering with us, we will also collect your professional and employment information in order to respond to your inquiries, communicate with you, to manage and grow our organization and to facilitate a business relationship.

Surveys & Sweepstakes. If you choose to take advantage of a promotion, respond to a survey, or enter a contest or sweepstakes, we collect your personal identifiers, customer records and any other personal information you are requested to provide at the time, or choose to provide to us. We use this information to administer and facilitate the Services, to respond to your submission, to communicate with you, to conduct market research, inform our marketing and advertising activities, and improve and grow our business.

2.2. Usage Data

Usage Data is collected automatically when using the Service.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

2.3. Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service. The technologies We use may include:

- **Cookies or Browser Cookies.** A cookie is a small file placed on Your Device. You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.
- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

Necessary / Essential Cookies

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

Cookies Policy / Notice Acceptance Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

Functionality Cookies

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

2.4. Use of Your Personal Data

The Company may use Personal Data for the following purposes:

To provide and maintain our Service, including to monitor the usage of our Service.

To manage Your Account: to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication.

To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.

To manage Your requests: To attend and manage Your requests to Us.

For business transfers: We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.

For other purposes: We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

With Service Providers. We share information with third party vendors and service providers that perform services for or on our behalf, which may include identifying and serving targeted advertisements, providing mailing or email services, tax and accounting services, product fulfillment, payments processing, photo sharing, data processing and enhancement services, medical and health purposes, fraud prevention, web hosting, analytic services, or other online functionality, subject to appropriate contractual terms protecting the confidentiality and use of such data.

Promotional Partners. We may share limited personal information with third parties with whom we partner to provide promotions, excursions, activities, contests, and sweepstakes, or other promotional activities. The partner will usually be identified by name in our promotion, contest, or sweepstakes communication.

With Travel and Excursion Partners. Some onboard products and services, excursions and other activities are provided by other companies or you may book a travel through multiple operators, such as a travel agent or cruise line. We may share personal identifiers and similar information before, during and after your cruise to facilitate your travel activities, provide your requested services, and provide a seamless service to our guests.

For business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.

With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.

With Your consent: We may disclose Your personal information for any other purpose with Your consent.

2.5. Retention of Your Personal Data

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

2.6. Transfer of Your Personal Data

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

2.7. Delete Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You at: robot@center.cruises.

Our Service may give You the ability to delete certain information about You from within the Service.

You may update, amend, or delete Your information at any time by signing in to Your Account, if you have one, and visiting the account settings section that allows you to manage Your personal

information. You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us.

Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

2.8. Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

2.9. Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

3. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE GENERAL DATA PROTECTION REGULATION (GDPR)

This Notice is for people who are located in the European Economic Area (“EEA”), Switzerland or the United Kingdom (“UK”) and supplements our general Privacy Notice. Our processing of personal data of people who are in the EEA is governed by the European Union’s General Data Protection Regulation (the “GDPR”).

Our processing of personal data of people who are in the UK is subject to the Data Protection Act 2018, which incorporates the GDPR as the UK GDPR. This Notice refers to the GDPR and the UK GDPR collectively as the “GDPR”.

As of the most recent revision date of this Notice, we anticipate that Switzerland’s updated data protection law will go into effect by September 01, 2023. For the sake of administrative efficiency, this Notice applies to people in Switzerland as well as people in the EEA or UK. However, this does not limit any additional right that people in Switzerland may have.

The GDPR requires us to provide certain information to you about your personal data, which we refer to in this notice as your personal information.

3.1. Purposes of the processing

Our general Privacy Notice describes the personal information that we collect, use, share, or otherwise process personal information – and the purposes for that processing -- in the course of operating our business (other than in the course of legal representation of a client, which is subject to our client agreements and professional responsibilities). Personal information gathered through cookies and similar tracking technologies is used for the purposes described in our Privacy Preference Centre.

3.2. Lawful basis for the processing

Generally, we process personal information provided by visitors through our website or other interactions with us on the basis our legitimate interests in conducting our business as a law firm. Where we ask for your consent, we process personal information on the basis of that consent.

We may also process personal information on other bases permitted by the GDPR and applicable laws, such as when the processing is necessary for us to comply with our legal obligations.

3.3. Categories of personal information

The categories of personal information that we process are described in our general Privacy Notice.

3.4. Recipients of your personal information

We use various service providers to manage our website and provide services such as event registration or managing e-mail communications. Our service providers change from time to time. Note that our service providers have entered into contracts with us that restrict what they can do with your personal information. If you would like specific information about our service providers who have received your information, please contact us at robot@center.cruises and we will provide that information to you. We may also disclose your personal information to other categories of third parties as described in Part 3 of our general Privacy Notice.

3.5. Retention period for personal information

How long we retain personal information varies according to the type of information in question and the purpose for which it is used. We delete personal information within a reasonable period after we no longer need to use it for the purpose for which it was collected (or for any subsequent purpose that is compatible with the original purpose). This does not affect your right to request that we delete your personal data before the end of its retention period. We may archive personal data (which means storing it in inactive files) for a certain period prior to its final deletion, as part of our ordinary business continuity procedures.

3.6. Your data subject access rights

You have the right to request access to your personal data, to have your personal data corrected, restricted or deleted, to withdraw any consent that you have given to the processing of your personal data (without affecting the lawfulness of the processing prior to your withdrawal of consent) and to object to our processing of your personal data. You also have the right of data portability in certain circumstances, which means that you can request that we provide you (or a third party you designate) with a transferable copy of personal information that you have provided to us. Your rights may be subject to various limitations under the GDPR. If you wish to exercise any of these rights, or if you have any concerns about our processing of your personal data.

3.7. The right to lodge a complaint with a supervisory authority

You have the right to file a complaint concerning our processing of your personal data with your national (or in some countries, regional) data protection authority.

The EU Commission has a list here: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

The data protection authority for the United Kingdom is the Information Commissioner's Office: www.ico.org.uk.

The federal data protection authority for Switzerland is the Federal Data Protection and Information Commissioner: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/task.html>.

3.8. Absence of statutory or contractual requirement or other obligation to provide any personal data

Users of our website are under no statutory or contractual requirement or other obligation to provide personal information to us, but it will not be possible to receive communications from us or register for our events without doing so.

4. GOOGLE ANALYTICS

To improve the user experience of our Services, the following web analytics service is used:

We use Google Analytics, a service for the marketing analysis of this website, of Google Inc. ("Google"). Google Analytics uses codes consisting of text and numbers, which will be stored on

your computer and which allow for an analysis of the use of the Websites (“Cookies”). The information generated by the Cookie about your use of the Websites (including your IP address) will be transferred to and stored by a Google Server. Google will use this information to evaluate your use of the website, to prepare reports about the website activities for the website operators and to provide further services connected to the use of websites and the use of the Internet. Google may transfer this information to third parties, if legally obliged to do so or if third parties process these data on behalf of Google.

You can delete or disable such cookies using your Device settings; in this case, you will not be able to fully use all the functions of this Service. By using this Service, you consent to the processing of Your personal data by Google in the manner and for the purposes set out above. You can block the transmission of your data by using the browser deactivation plugin on the page <https://tools.google.com/dlpage/gaoptout?hl=ru>.

5. CHILDREN’S PRIVACY

Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 18 without verification of parental consent, we take steps to remove that information from our servers.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

6. LINKS TO OTHER WEBSITES

Our Service may contain links to other websites that are not operated by Us. If You click on a third party link, You will be directed to that third party’s site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

7. CHANGES TO THIS PRIVACY POLICY

We may update Our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the “Last updated” date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

8. CONTACT US

If you have any questions about this Privacy Policy, You can contact us by:

- E-mail: robot@center.cruises