# **Privacy Policy**

# A. Introduction

The privacy of our apps visitors is very important to us, and we are committed to safeguarding it. This policy explains what we do with your personal information.

## B. How we collect your personnal data

The following types of personnal information may be collected, stored, and used:

1. Information about your computer including your IP address, geographical location, browser type and version, and operating system.

2. Information about your visits to and use of this application including the referral source, length of visit, page views, and website navigation paths.

3. Information that you enter when you register with our application, such as your email website.

4. Information that you enter when you create a profile on our website. for example, your name, profile pictures, gender, birthday, name and characteristics of boat, navigation of boat, events of sailing, ...

5. Information that you enter in order to set up subscription to our emails and/or newsletters.

6. Information that is generated while using our website, including when, how often, and under what circumstances you use it.

7. Information relating to anything you purchase, services you use, or transaction you make through our application, which includes your name, address, telephone number, email address, and credit card details.

8. Information that you post to website with the intention of publishing it on the internet.

9. Any other personal information you send to us.

## C. Using Personal Information

Personal information submitted to us through our website or apps will be used for the purposes specified in this policy or on the relevant pages of the website or apps. We may use your personal information for the following:

- 1. Administering our website or apps and business.
- 2. Personalizing our website or apps for you.
- 3. Enabling your use of the servives available on our apps or website.
- 4. Sending you goods pruchassed through our apps or website.
- 5. Supplying services purchased through our apps or website.

6. Sending statements, invoices, and payment reminders to you, and collecting payments from you.

7. Sending you on-marketing commercial communication.

8. Sending you email notifications you have specifically requested.

9. Sending you our email newsletter if you signed up for it (you can unsubscribe at any time).

10. Sending you marketing communications relating to our business or the business of third parties which we think may be of interest to you.

11. Providing third parties with statistical information about our users.

12. Dealing with inquiries and complaints made by or about you relating to our website or apps.

13. Keeping our apps and website secure and prevent fraud.

14. Verifying compliance with the terms and conditions governing the use of ours apps and website.

15. Others uses.

If you submit personal information for publication on our website or apps, we will publish and otherwise use that information in accordance with the license you grant us.

Your privacy settings can be used to limit the publication of you information on our website or apps and can be adjusted using privacy controls on the website or apps.

We will not, without your expressed consent, supply your personal information to any third party for their or any other party's direct marketing.

## E. Disclosing personal information

We may disclose your personal information to any of our employees, officers, insurers, 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 your group of companies (this means our subsidiaries, our ultimate holding company ad all its subsidiaries) as reasonably necessary for the purposes set out in this policy.

We may disclose your personal information:

- 1. To the extent that we are required to do so by law;
- 2. In connection with any ongoing or prospective legal proceedings;

3. In order to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
4. To the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and

5. To any person who we reasonally believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

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

#### F. International data transfers

1. Information that we collect may be stored, processed in, and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy. Information that we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in the European Economic Aera: the United States of America, Russia, Japan, China, and India.
 Personal information that you publish on our apps or website or submit for publication on our apps or website may be available, via internet, around the world. We cannot prevent the use or misuse of such information by others.
 You expressely agree to the transfers of personal information described in this section F.

#### G. Retaining personal information

1. This section G sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations regarding the retention and deletion of personal information.

2. Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

3. Without prejudice to article G-2, we will usually delete personal data falling within the categories set out below at the date/time set out below:

- personal data type will be deleted: 6 months

4. Notwithstanding the other provisions of this section G, we will retain documents (including electronic documents) containing personal data:

a. To the extent that we are required to do so by law;

b. If we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

c. In order to establish, exercises, or defend our legal rights (including information to others for the purposes of fraud prevention and reducing credit risk).

## H. Security of your personal information

1. We will take reasonable technical and organizational precautions to prevent the loss, misues, or alteration of your personal information.

2. We will store all the personal information you provide on our secure (passwordand firewall -protected) servers.

3. All electronic financial transactions entered into through our apps or website will be protected by encryption technology.

4. 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

5. You are responsible for keeping the password you use for accessing our apps or website confidential; we will notify ask you for your password except when you log in to our apps or website.

#### I. Amendements

We may update this policy from time to time by publishing a new version on our website or apps. You should check this page occasionally to ensure you understand any changes to

this policy. We may notify you change to this policy by email or through the private messaging system on our website or apps.

## J. Your rights

You may instruct us to provide you with any personal information we hold about you.

We may withhold personal information that you request to the extent permitted by law.

You may instruct us at any timle not to process your personal information for marketing purposes.

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.

#### K. Third party websites

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

### L. Updating information

Please let us know if the personal information that we hold about you needs to be corrected or updated.