

At Pullmantur, we are committed to protecting the personal information you share with us. This statement sets out our privacy policy with respect to the information you provide to us when you agree to these terms and conditions.

By accepting these general terms and conditions, the user expressly consents, through this affirmative action, to the incorporation of his/her personal contact details in our Centralized Register of Authorizations, so that they may be processed by the different companies of the Pullmantur Group (see www.pullmantur.es) and for the following purposes that the user also expressly accepts:

1. Purposes of data collection

The sending of commercial communications, either on paper or by electronic or telematic means: On products and services that, at any time: i) are marketed by Pullmantur, ii) or are marketed by any of the companies of the Pullmantur Group whose activities are carried out pursuant to Royal Legislative Decree 1/2007, of 16 November, approving the consolidated text of the General Law for the Protection of Consumers and Users and related laws, or any other law that should amend or replace it. The User may choose, at any time, the channels or means by which he/she wishes to receive or not to receive the aforementioned communications.

2. Sending of commercial offers

Pullmantur may process the personal data you have provided (such as contact details and personal details such as date of birth, hobbies and cruise-related interests) for the purposes of customer service, sending selected information about Pullmantur products and services and for market research purposes. Pullmantur may also transmit such data to [certain entities of the Pullmantur Group](#), which will use the data to contact you for the purposes indicated. Updates of such data may be shared among such entities.

3. Profiling

Automated profiling in order to offer products that are more congruent with your needs. To this end, Pullmantur informs you that:

- i) this analysis does not produce any legal effects or discriminatory consequences that may arise due to sensitive criteria, such as race or ethnic origin, political opinions or religious beliefs, state of health or sexual orientation, since this information is not included in the processing,
- ii) your right to obtain human intervention in the processing, to express your point of view, obtain an explanation of the decision made based on the automated processing, and to challenge such decision via direct communication with our DPO (webmaster@pullmantur.es),
- iii) the logic applied is based on a proactive analysis of risks and application to its technical statistical data and customer segmentation, for the following purposes:
 - a) to study products or services that may be adjusted to the User's specific profile and travel, for the purpose of making commercial offers that meet your needs and preferences,
 - b) to perform monitoring of the products and services contracted,
 - c) to perform, either by Pullmantur or third parties it should engage, satisfaction surveys by telephone or electronic means in order to evaluate the services provided
 - d) to design new products or services, improve the design and usability of current products and services, and to define or improve users' experiences.

For this type of processing, Pullmantur must at all times request the express and unequivocal consent of the user, who may, at any time, refuse such processing.

The user also accepts that his or her customer profile data may be transmitted by Pullmantur to Pullmantur Group companies for the above purposes, and that these companies may contact you with relevant content. The user, if available, authorizes the incorporation into the profiles that are developed

about him, the data that has been provided personally such as: contact details (such as name, address, email); additional information (type of cruise, itineraries, excursions or preferred seas); identification data (such as name, surname, phone number email); customer history (such as receipt of offers, purchase data of other cruises or supplementary services offered by Pullmantur); data from apps, websites or social networks (such as usage data of online searches or information requests).

4. Centralized Register of Authorizations (CRA)

Pullmantur, in order to provide better service and improve control of the user's data, has created the CRA, the purpose of which is to store the data provided by the User and to process them exclusively for those purposes to which the User has given his or her consent as well as for those purposes which, without having given his or her consent, are permitted by the General Data Protection Regulation (RGPD) and, therefore, have a legal basis.

The User's data, included in the Centralized Register of Authorizations and consisting of creation date, email, phone number, full name, will be supplemented and enriched by data obtained from companies providing commercial information, by data obtained from public sources, as well as by statistical and socio-economic data (hereinafter "Additional Information"), with verification that these comply with the requirements established in current data protection regulations.

The data added to the CRA will be collected through the following channels that Pullmantur has put in place for data collection: (i) telematic: download of budgets, online check-in; purchase process of cruises or other supplementary services such as excursions, beverage packages, optional services, survey channel, newsletters and email webmaster@pullmantur.es (ii) in person: call center, on-board check-in process and call me back.

5. Time limit for retention of data in the Centralized Register of Authorizations

The data entered in the CRA, in the event of the User exercising his rights to eliminate or revoke the consent granted, will be executed by Pullmantur Cruceros within a maximum period of 72 hours.

6. Legitimacy of processing

The legal basis for the processing of your personal data, in relation to the purposes mentioned above, is the consent given by the user through the acceptance of these general terms and conditions, which will be applicable pursuant to the consents expressly given to Pullmantur in relation to points 2 and 3 above.

7. User exercise of rights

The user has the right to access his or her personal data, as well as the right to request the rectification of inaccurate data or, where appropriate, to request their erasure when, among other reasons, the data are no longer necessary for the purposes for which they were collected. You may also request a restriction on the processing of your data, in which case we will only retain your data for the purpose of exercising or defence against claims. In certain circumstances and for reasons relating to your particular situation, you may object to the processing of your data. In the foregoing case, Pullmantur will cease processing the data, except for compelling legitimate reasons, or for the exercise or defence against any claims.

The user may access, rectify, request erasure of or object to the processing of his/her information, as well as withdraw his/her consent at any time, without this affecting the lawfulness of the processing based on the consent prior to the withdrawal thereof through the corresponding menu on the intranet (Centralized Register of Authorizations).

To exercise these rights, you may write to Pullmantur with the reference “GDPR Rights”, at its head office located at C/Mahonia, 2, Madrid, 28043 enclosing a copy of an official identification document or by e-mail to Pullmantur's DPO (webmaster@pullmantur.es) or contact us at the phone (*) For further information on the processing of your personal data and your rights, see the data protection policy on the website www.pullmantur.es

8. Complaints to the data protection authority

The user can address his or her claims arising from the processing of his or her personal data to the Spanish Data Protection Agency (Agencia Española de Protección de Datos) (www.agpd.es). This privacy policy was last amended in May 2018.