
Pullmantur Data Protection Policy

Introduction

The following terms and conditions correspond to the company Pullmantur Cruises S.L. CIF B84581701. Domiciled at calle Mahonia 2. 28043. MADRID. Registered in the Companies Registry of Madrid in volume 22355 general, book O, folio 65, section 8, page number M-399166, Entry 2. CICMA-1878 as a wholesaler-retailer (hereinafter, Pullmantur Cruises).

At Pullmantur Cruises we are committed to protecting the personal information you share with us as it is essential for us to guarantee and protect the privacy and confidentiality of your personal data, in accordance with the General Data Protection Regulation (EU Regulation 2016/679).

This statement establishes our privacy and data protection policy with respect to the information you provide us with so that we can guarantee that i) at any time, you may request the cancellation of your personal data provided that the legal requirements for data protection and conservation are met, ii) we undertake to comply with the obligation of secrecy of the personal data collected, the duty to store them and not communicate them to third parties, without the express consent of the owner of the same, iii) we have adopted the necessary technical and organisational measures, taking into account the state of the art, the costs of their application, and the nature, scope, setting and purposes of treatment, in addition to the variable risks of probability and severity for the rights and liberties of individual persons, in order to ensure a level of security that is adequate for the detected risk, and ensure pseudonymisation and encryption of personal data and our ability to ensure the permanent confidentiality, integrity, availability and resilience of processing systems.

1. Purpose of collection, processing and use of personal data

The collection and use of personal data, with the exception of the cases outlined in the following section "processing of data to allow access to the website", is only possible if you voluntarily provide us with your personal data. This applies to the following purposes:

(i) Contracting of travel package ("the Contract")

The personal data provided in the course of your booking of the package tour (the "Reservation") will be collected, processed and used for the purpose of managing your reservation for the subsequent performance of the Contract entered into, and for the purpose of maintaining the contractual relationship, managing, administering, providing, extending and improving the services, as well as sending technical and operational information relating to the Contract, by any means, including email and/or equivalent means. In this regard, we inform you that your personal data along with the result of any satisfaction surveys will be used to evaluate your opinion and study your particular profile, with the sole purpose of improving our services and thus adapting and designing our commercial offerings.

If health information is collected, the purpose shall be to provide medical services in the event of an emergency that, if you are in agreement, can be adapted most effectively to your personal circumstances and health. Health data shall not be provided to third parties, except under legal obligation or in pursuit of a legitimate interest of the company, a third party or your own. If your health data is not provided, Pullmantur reserves the right to refuse delivery of the relevant benefit.

Upon making the Reservation, the personal data of other travellers may also be recorded. Therefore, please make sure that this information is provided with the consent of your travel companions.

(ii) Claims management

The personal data provided over the course of your claim (the "Claim") will be collected, processed and used for the purpose of managing your claim and resolving it as well as sending or requesting information related thereto and that is necessary for its proper resolution, by any means, including email and/or equivalent means. If health information is collected, the purpose shall be to analyze the reason for the claim. Health information shall not be provided to third parties, except under legal obligation or in pursuit of a legitimate interest of the company, a third party or your own.

Upon making the claim, the personal data of other travelers may also be recorded. Therefore, please make sure that this information is provided with the consent of your travel companions.

(iii) Payment for services.

The personal data provided while contracting your Travel Package shall be collected, processed and used for the purpose of managing the payment of your Travel Package. Should you choose to finance your Travel Package with financial entities with which Pullmantur has a collaboration agreement, your data will be provided to said corresponding financial entity.

The personal data of children and adolescents (minors below the age of 13) are only collected, stored and used for the purposes of management and resolution of the Contracting process or the Claim.

1.1 Data retention period

The personal data provided in the contracting process will be retained as long as the business relationship between the parties is maintained and for a maximum period of 5 years. However, if, due to its characteristics, the trip was affected by Act 10/2010, of 28 April, on the prevention of money laundering and terrorist financing, the data shall be retained for a maximum period of 10 years - *after the contract ends*.

1.2 Legitimacy of processing

The legal basis for the processing of your personal data is, in relation to the aforementioned purposes, in compliance with the legal obligations based on the Contract signed (Royal Legislative Decree 1/2007, of 16 November, approving the consolidated text of the General Law for the Defence of Consumers and Users and Supplementary laws; Regulation 261/2004 OF THE EUROPEAN PARLIAMENT AND THE COUNCIL, of 11 February 2004, establishing common rules on compensation and assistance to passengers in the event of denied boarding and of cancellation or long delay of flights; as well as by the applicable international regulations and, in particular, by the Athens Convention, of 13 December 1974, modified by the London Protocol, of 19 November 1976, by the text updated on 5 September 2013 of Regulation (EC) no. 392/2009 of the European Parliament and of the Council, of 23 April 2009, on the liability of carriers of passengers by sea in the event of accidents, by Regulation (EU) no. 1177/2010 of the European Parliament and of the Council, of 24 November 2010, concerning the rights of passengers when travelling by sea and inland waterway and by Regulation (EC) no. 2006/2004; and by the other applicable national and international regulations related to the individual services that make up the tourist package).

1.3 Communication of data to third parties

Data shall not be provided to third parties unless you have given your prior express and unequivocal consent, or under legal obligation or in pursuit of a legitimate interest of the Company, a third party, or your own. However, your data may be communicated to other entities of the business group to which Pullmantur Cruceros belongs or to third parties, such as i) Financial entities; ii) Fraud detection and prevention entities; iii) Suppliers of technological services; iv) Suppliers of services related to customer service; v) Suppliers and collaborators of logistics, transport and delivery services; and vi) Suppliers related to the contracted Cruise ship. Said communication is carried out for the proper performance of the purposes described in the Purpose of collection, processing and use of Personal Data section herein.

Thus, for the management of the purposes inherent in the performance and fulfillment of the above, we inform you that your personal data shall be communicated to Royal Caribbean Cruises Ltd (USA) and to the rest of the Pullmantur group companies (see www.pullmantur.es). In order to correctly process and resolve claims, we must communicate your personal data to the different suppliers of the products that are involved in the Claim or whenever it is necessary for the proper performance thereof.

In accordance with the selected destination, we inform you that i) as per U.S. Federal legislation, if your journey has its origin, destination or a stopover in that country, your personal data in the current PNR (reserve) will be accessible to the part of the Customs Department of the United States and, ii) in accordance with the Order of the Ministry of Transport of the Russian Federation, of 19 July 2012, no. 243, your personal data and that of the rest of the passengers in the same booking reference shall be communicated to the Ministry of Transport of the Russian Federation by means of connection to the automated centralized database on passengers (ACDPDP).

1.4 Transmission of data to countries outside the EU (European Union).

To the extent necessary for our purposes, we also transmit your data to non-EU recipients, ensuring that the recipient of the data assures an adequate level of data protection and that it does not violate any other legitimate interests. In order to ensure an adequate level of protection for the data recipient, please note that we use the EU Commission's model contracts for the transfer of personal data to third countries.

2. Purposes other than collection

When subsequent processing of personal data is planned for a purpose other than that for which they were collected, the user will be provided information on this purpose and any pertinent additional information to allow the user to give their express and unequivocal consent.

(i) Automated decisions

If Pullmantur Cruceros has obtained the user's express and unequivocal consent, it will make automated decisions, including profiling, with the aim of providing information on products and services according to the circumstances of the user and of the market.

(ii) Newsletter and subsequent advertising

This will require your express and unequivocal consent. Therefore, if you wish to receive our newsletter, you must register and provide us with a working email address that allows us to verify that

you are the applicant and owner of the e-mail address. The user, by accepting the [Privacy Policy for the sending of communications](#) expressly consents, through this affirmative action, to the incorporation of his or her personal contact data to our Centralized Register of Authorizations (CRA).

(iii) Processing of data to enable use of the website

When you visit any of our websites, we collect the data necessary for you to access them (use data). This includes your IP address and information about the start, end and subject of your use of the website, as well as possibly identifying information (for example, your login details if you register in the Private area). These data are used for the provision and design of the service based on the needs of each user and are deleted as soon as they are no longer needed.

(iv) Cookies

If you visit our websites, the information may be stored in the form of a cookie on your local device. Cookies are small text files that are sent from a web server to your browser and stored on your own device. This allows us to recognize you when you visit the website repeatedly. This way we can ensure better site functionality and, for example, prevent you having to log in repeatedly. For more information about the cookies we use, please see our Cookies Policy.

(v) Use profiles with pseudonyms for advertising and market research (web monitoring and analysis)

For advertising, market research and to make the use of our websites as enjoyable as possible, Pullmantur Cruises uses web tracking systems. In this regard, data about the use of our website in pseudonymous user profiles are stored. This will allow us to further develop our websites and tailor our content to your needs. In addition, use profiles are used for redirection. This allows Pullmantur Cruises to publish and post offers of interest on other websites you visit. Pseudonymous use profiles are not combined with personal data.

You may object to the creation of pseudonymous use profiles. First, you can prevent cookies from being set up on your browser (see Cookies Policy). You can install certain add-ons in your browser to protect your privacy, making it impossible to track you.

(vi) Data collection by third party providers/social networks

Our website contains links to social network operators (e.g. Facebook, XING, Google Plus, LinkedIn, Twitter, etc.). These social networks are operated exclusively by third parties. If you follow the links, the information may be transmitted to these third parties. In order to understand the purpose and scope of collection of your data by social networks and subsequent local processing, as well as your rights and how to protect your privacy, you should consult the respective privacy policies of the operators themselves.

2.1 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 or her rights to eliminate or revoke the consent granted, will be executed by Pullmantur Cruceros within a maximum period of 72 hours.

2.2 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 the [Privacy policy for sending communications](#).

3. Data security

Pullmantur Cruises has implemented the necessary technical and organisational measures, taking into account the state of the art, the costs of implementation, and the nature, scope, context and purposes of the processing, as well as risks of varying probability and severity to the rights and freedoms of natural persons, to ensure a level of security appropriate to the risk detected and to ensure the pseudonymisation and encryption of personal data and the ability to guarantee permanent confidentiality, integrity, availability and resilience of processing systems and services.

All our employees, collaborators and all persons involved in the processing of personal data are obliged to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as other laws relevant to data protection and the confidential handling of personal data.

To protect the personal information of our users, we use a secure method of transmission (Secure Socket Layer - SSL). SSL encryption guarantees the encrypted and complete transmission of your data.

4. Exercise of rights by the data subject

We inform you that you have the right, free of charge and to the extent that legal requirements are met, to obtain confirmation as to whether or not Pullmantur Cruceros processes personal data concerning you. As the concerned party, you have the right to access your personal data, as well as the right to request the rectification of inaccurate data or, where appropriate, to request their deletion 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 or for compelling legitimate reasons.

In certain circumstances and for reasons relating to your particular situation, you may object to the processing of your data. Pullmantur Cruceros will cease processing the data, except for compelling legitimate reasons, or for the exercise or defence against any claims.

In all communications whose purpose is to send advertising, you may exercise your right of opposition. To the extent that you have given your consent for data protection, you may revoke it at any time with effect for the future. To exercise these rights, you may write to Pullmantur with the reference "GDPR Rights", at its headquarters located at C/Mahonia, 2 (28043), Madrid, enclosing a copy of an official identification document, or by email to the DPO of Pullmantur (webmaster@pullmantur.es).

5. Claims 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).