

DATA CONFIDENTIALITY STATEMENT AND DATA PRIVACY POLICY

SAILINGEUROPE – NAVIGATIO EUROPÆ Ltd.

Latest update on: 4 November 2015

This Data Confidentiality Statement refers to the confidentiality of data collected at Internet sites owned by the company Navigatio Europæ d.o.o. – SailingEurope Ltd (hereinafter referred to as: SailingEurope).

SailingEurope undertakes to use the data received from users in good faith and to not distribute or sell any users' private data to unauthorized third parties without users' consent.

SailingEurope as a service provider of the Internet site www.sailingeurope.com and other Internet sites owned by SailingEurope (hereinafter referred to as: Web sites) shall adhere to applicable legal regulations in order to protect privacy of the abovementioned Web sites' users.

The users – visitors of our Web sites are hereby instructed to read in detail this Data Confidentiality Statement in order to fully understand which data is being collected by SailingEurope and how it is being used.

By accessing or by using our Web sites, the user confirms to have read and understood this Data Confidentiality Statement and confirms to agree with all data confidentiality terms along with terms on the use of our Web sites.

In case that the user does not agree with this Data Confidentiality Statement, we kindly advise the user to leave our Web sites and to discontinue their usage.

SailingEurope may, in accordance with the law, collect certain user data while its Web sites are being used, such as for example device type and Internet provider data as well as the data entered in the process of user registration.

This data will be used by SailingEurope in order to obtain relevant information on its Web sites' usage for the purpose of improving its services and for adjusting and modifying Web sites' content in line with users' interests. Based upon the collected data, Sailing Europe may also gain more insight on the most popular content on its Web sites. Such methods of data collection, to same or larger extent, are highly common and used by many well-known web sites like MSN, Google etc.

When a user participates in certain activities at our Web sites, like opening of a user account, making inquiries or booking services or vessels, ordering services, filling in questionnaires, sending feedback etc., SailingEurope may request him/her to provide certain information needed for provision of requested services, such as: name, family name, OIB (personal identification number), address, date of birth, passport number and/or identification card number, country of origin or present stay, e-mail address, phone number, credit card data including card number, expiry date, authorization code and other related information, not only for the person inquiring about vessel rental services but also for all of his/her guests on board of the same vessel.

Participation in the identification activities and personal data provision shall be at user's discretion;



however, if the user does not provide the requested data for certain activities, information or services, the requested information or service shall neither be provided to the user nor s/he will be allowed to participate in the requested activity.

SailingEurope shall not disclose any personal details regarding its users and their guests on the vessel to third parties, except in cases stated in the next paragraph and in situations required by applicable legal regulations.

Personal data belonging to users and their guests on board of the chartered vessel shall be used exclusively for provision of vessel chartering and related services. Therefore, they will be shared only with those parties who are included into the process of vessel chartering and/or organization of related additional services, i.e. with fleet operators, vessel owners, crew members, transport organizers, organizers of additional ordered services or other agents participating in the provision of services; along with the official authorities pursuant to the valid legal regulations. By booking the vessel rental services and/or related services, the user agrees to share its personal data with the abovementioned parties.

The user will have an option to access and modify the personal data s/he had provided. The user may change any of his/her personal data via contact form visible on the Web sites. The user must fill in his/her name, family name, e-mail address and state which data s/he wishes to amend. In order to protect data security, SailingEurope may, in an appropriate manner, require a confirmation of new data validity from the user.

As a condition for using its services, SailingEurope requests user's permission to send him/her administrative and promotional e-mails. In case that the user does not wish to receive any more e-mails, s/he can choose at any time the option to unsubscribe from the mailing list by clicking the unsubscribe link present in every newsletter.

SailingEurope takes the data protection task seriously and various precaution measures had been taken in order to protect our users' personal data. However, absolute security of any data transmission via Internet or other wireless networks cannot be guaranteed. As a result, despite of undertaking all commercially reasonable data protection measures, SailingEurope cannot guarantee protection of information transferred from or to its Web sites and cannot be held responsible for actions of any third party receiving such data.

SailingEurope's Web sites are intended exclusively for legally competent persons, thus data concerning all persons younger than 14 shall be collected exclusively in line with the valid legal regulations of countries in which vessels are being chartered, for the purpose of submitting a crew list of chartered vessels' passengers and crewmembers, or similar legally prescribed purposes.

COOKIES

By continuing to use our Web sites you agree to the use of cookies. By blocking cookies, you will still be able to access our Web sites but some of their contents may not be available to you.

Approximately 90% of web sites today use various types of cookies in order to make their service provision faster for their users and/or to make revisiting of their sites easier and more personalized.

A cookie is information stored on the user's computer with data about web sites visited by the user; so



when the user opens the already stored web site, the Internet browser sends back cookies belonging to that web site, which enables the web site to show the user information adjusted to his/her needs.

Cookies may store a number of data, including users' personal data such as name or e-mail address etc. Web sites cannot obtain access to user's data unless they are enabled so by the user. The user may change Internet browser's settings at any moment and in this way decide whether s/he will enable storage of cookies in his/her computer or not. Information on how to disable cookies can be found at www.youronlinechoices.eu

At SailingEurope's Web sites there are cookies used for measuring Web sites' usage and cookies owned by third parties' services like social networks services and services for measuring number of visits and Web site popularity.

PRIVACY STATEMENT

SailingEurope undertakes to protect personal data of its users – vessels rental service customers - by collecting only data needed for a quality conclusion of vessel chartering activities and provision of related services. SailingEurope provides to its Web site users information about the manner in which their data are being used, and provides a choice to its clients on their data usage, including the option to remove their name from the client list receiving SailingEurope's newsletter.

Data on SailingEurope's users shall be kept and used exclusively for the purposes they had been provided by the Web sites' users, i.e. for rental of vessels and provision of related services. The abovementioned data shall be available to SailingEurope's employees and partners involved in provision of vessels rental and/or related services, as well as to government bodies in accordance with applicable legal regulations.

All SailingEurope employees and business partners receiving users' data for the purpose of providing vessel rental services and/or related services, shall be held responsible for respecting the privacy rights and for protection of users' personal data. SailingEurope cannot be held responsible for omissions or defaults of third parties to whom users' data had been transferred for the purpose of providing vessel rental services and/or related services.

DATA CONFIDENTIALITY STATEMENT'S MODIFICATION

This Data Confidentiality Statement may be modified at any time by SailingEurope, which shall be executed by publishing the modified Statement text in Data Privacy section of Web sites. Such Data Confidentiality Statement's amendments shall come into force from the moment of their publishing on Web sites.

The user undertakes to check whether there had been any modifications of the Data Confidentiality Statement when revisiting the Web sites. The continuation of the Web sites' usage by the user after the modifications had taken place shall mean that the user agrees with and accepts all modifications of the Data Confidentiality Statement.

