

# Privacy Policy

## 1. Who's responsible for your personal data?

When you sign up as a user of our web-based platform available under [www.agent.royalcaribbean.dk/fi](http://www.agent.royalcaribbean.dk/fi) (hereinafter "My Club Royal"), you, RCL Cruises Ltd. and ("We", "Us", or "Our") will act as a controller, and are responsible for the processing of any personal data you provide to Us via My Club Royal.

This Privacy Notice relates specifically to the use of My Club Royal. For a more general explanation of the way we as well as the other companies of our group – which consists of Us, Royal Caribbean Cruises Ltd., 1050 Caribbean Way, Miami, Florida 33132, USA trading as Royal Caribbean International and their and our affiliates and subsidiaries (hereinafter the "Royal Caribbean Group") – process data of our suppliers and business partners, please see Our [Suppliers and Business Partners Privacy Notice](#). This notice does not relate to data processing for consumers.

## 2. What personal data do we collect or receive?

2.1. The following are categories of your personal data that we process:

Initially, we will collect data you provide to us (e.g. name, date of birth, payment data,) for the purpose of your registration to My Club Royal. We will also collect information relating to our business relationship (e.g. contracts, bookings and revenues generated by your agency and created by you). Additionally, we might, to the extent permitted by law, check your details against law enforcement registers and our internal records for security purposes.

We might from time to time process your data for the purpose of participation in incentive programs. We will collect personal data such as contact data in order to fulfill Our obligations under such incentive programs.

Using technology, our sites can collect information about the type of browser you are using, your operating system and your IP address information using technology. An IP address is a number that is automatically assigned to your computer and is recognized by Web technology whenever you are surfing the Internet. As technology evolves, additional methods of information gathering may



be used, such as “pixel tags” (also known as “web beacons” and “clear gifs”). We will update our *Privacy Policy* from time to time to record any changes in the way we use your data and inform you of this.

2.2. If you provide information to us containing personal data of individuals (e.g. employees, sub-agents or guests), please make sure that you or your company is authorized by all relevant individuals to provide their personal data, including sensitive data (e.g. health data), to us and to permit the processing of such personal data as set out in this *Privacy Notice*. This includes – as the case may be – notifying relevant individuals in accordance with applicable data protection law and, where necessary, obtaining consent.

### **3. How We use your personal data and who we share it with**

3.1. This section explains how We use the personal data listed above and who We share it with. We process the data for the purpose of Our business relationship, e.g. for fulfilling and evaluating our mutual contractual obligations, offering business incentives (conferences, cruises etc.) and opportunities to you and evaluating your professional trustworthiness.

3.2. We use your personal data:

(a) On the basis of your consent, to

- provide, maintain, improve, and develop our services
- communicate with you
- inform and advise you on products of Royal Caribbean Group
- provide medical assistance, e.g. in the context of a cruise provided in the course of an incentive trip

(b) For the preparation and/or performance of a contract with you, to

- establish a business relationship
- set up and maintain your user accounts, provide technical support and for other related purposes



- prepare offers for our products, deliver our services to you and fulfill our mutual contractual obligations.
- To reward you with incentives pursuant to My Club Royal on achievement of any terms for the payment of incentives

(c) For Our legitimate interests, to

- provide, maintain, improve, and develop our services
- communicate with you
- enhance the security of Royal Caribbean Group's IT-systems for the benefit of all our users
- assess your performance when you are rendering services to us
- assess your professional trustworthiness
- provide for your safety and the safety of others when you are on board one of our ships
- establish, exercise or defend a legal claim
- identify and pursue new ways to develop and grow Our business

(d) For Compliance with our legal obligations

We are sometimes subject to legal requirements to collect, retain and disclose personal data, for example for customs agencies or port authorities to allow our ships to dock, or where we need to cooperate with law enforcement agencies, including in relation to criminal investigations. Pursuant to the United States' Stored Communications Act (the SCA), we may be considered a provider of electronic communication services for certain services we offer through the digital platforms (because we provide users of the digital platforms the ability to send or receive wire or electronic communications). In such instances, we will not turn over records or other information pertaining to you unless compelled to do so by a Court of competent jurisdiction.

(e) For our business management activities, including, but not limited to, accounting, tax and fraud audits and investigations and to enable us to conduct reporting. Reports help us to monitor our performance and the performance of Our Suppliers as defined below. Additionally, we keep records to assist with any complaints you may have or in the event of a legal claim. We also process your feedback to improve our products and services.



#### 4. We may share your personal data with the following recipients for the purposes list above.

##### (a) Other members of the Royal Caribbean Group

We are a global business and we need to share your personal data with other members of the Royal Caribbean Group for the purposes above.

##### (b) Our Suppliers

When We say "Suppliers" in this *Privacy Notice*, we mean the parties who provide us with products and services that enable us to run our business and My Club Royal. This includes third parties who help us to host data, manage our websites, administer delivery of incentives, record data relating to performance, deliver cruise vacations, such as transport and accommodation vendors, media vendors, port agents, and who assist us to run our business, such as accountants, consultants, payment providers, auditors, IT service and platform providers, insurance providers, and legal advisers (together, Our "Suppliers").

We use products and services from our suppliers in the operation of our business. We choose our suppliers carefully and put in place safeguards to ensure that they protect your personal data. Specifically, the services provided to you through the My Club Royal Portal are operated on our behalf by the following suppliers:

(c) The My Club Royal website are operated on Our behalf by IST SERVICIOS INFORMATICOS S.L. with registered office address at Av.Vía Augusta 15-25, Edif B2, Planta 7, Desp 6, 08174 Sant Cugat del Valles, BARCELONA – SPAIN.

We use HUBSPOT IRELAND LIMITED (Company registration number IE515723) with registered office address in ONE DOCKLAND CENTRAL, GUILD STREET, DUBLIN 1 GUILD STREET, Ireland, to supply you with marketing materials and collateral via email.

We will share personal data via a weekly report for Our internal regional sales manager App hosted by 2VizCon GmbH, a German company with principal place of business at Dornhofstr. 34, 63263 Neu-Isenburg, Frankfurt Area, Germany and UK place of business at The Factory, 2 Acre Road, Kingston upon Thames, KT2 6 EF.

All of the abovementioned suppliers process personal data on our instruction as described in this privacy policy.

##### (d) Our Business Partners



We partner with companies to complement the products and services that we provide to you. We only do this in compliance with applicable law.

(e) Ports, customs and other government authorities, law enforcement agencies and courts and parties to litigation

We may need to share your personal data where required under the laws of countries in which we operate. Local ports and customs authorities require details of individuals onboard to process our ships in the ports at which they call. Law enforcement agencies may also require access to personal data, including in connection with criminal investigations, or we may be ordered to disclose personal data by a court or in connection with legal proceedings.

(f) Other third parties

We may share your personal data with other third parties at your request. My Club Royal may provide links to websites and applications or other digital tools that we believe may be useful to you in addition to adverts placed by third parties. These links will lead you to websites or digital tools operated by third parties operating under their own privacy policies. We encourage you to review those privacy policies, as we have no control over those third parties nor the information you may submit to those third parties.

## **5. Direct marketing**

5.1. We may contact you for marketing purposes, including to tell you more about our services, share news or tell you about promotions from time to time. You are always in control of the emails and texts that you receive and you can update your preferences in My Club Royal or opt out at any time by following the links in our emails or by contacting us using the details provided below. Please note that even if you have opted out of marketing messages, we might still need to contact you in relation to your bookings and trainings with us.

## **6. Cookies and other tracking technologies**

6.1. We use cookies and other technologies to collect information on our web pages for a variety of purposes, such as to improve the design and content of our website



and to enable us to provide a more personalized experience. We also use cookies for advertising and targeted tracking purposes, which aim to improve the relevance of the adverts you see. For example, after you visit our website you may be shown adverts relating to our services and products on third parties' websites.

6.2. Most web browsers have an option that allows you to turn off all cookies or have your computer inform you each time that a request to place a cookie is being made. If you turn cookies off (or refuse to accept a request to place a cookie), you may not have access to some features on our websites and some of our services. We also might not be able to remember your preferences, including in relation to marketing materials on our websites, without using cookies. For more information on our use of cookies, please read our cookie policy, which can be found in the footer of our websites.

## 7. Data retention

7.1. We retain your personal data only for as long as necessary: (i) for the purposes set out in this *Privacy Notice*; (ii) to provide our products and services to you; (iii) to comply with our legal obligations (e.g. to comply with tax or accounting rules or in connection with legal proceedings); or (iv) to comply with our usual business data retention policies. If you want to learn more about how long we retain your personal data, please contact us at any time using the contact details provided below.

## 8. Acting on someone else's behalf

8.1. If you give us information about another person (or persons), such as an employee, we will understand this to mean that they have appointed and authorized you to act on their behalf. This includes providing consent (to the extent this is required) to:

- (a) Us processing their personal data; and
- (b) you are receiving any notifications and notices on their behalf.

We may ask you to provide evidence that you have been appointed and authorized to act on behalf of the other person (or persons).



## 9. International data transfer

9.1. We are a global business and we need to share your personal data with other members of the Royal Caribbean Group and third parties for the purposes that we explain in this *Privacy Notice*. This means that we may transfer your personal data outside of the EEA (including to the United States, as this is where the servers that we use for our business, and on which your personal data is stored, are located). Sometimes transferring your personal data outside the EEA will be necessary for us to perform our contract with you. If any personal data is transferred outside the EU or EEA, whose data protection laws may be less protective than that of the EU / EEA, we will ensure that the recipient of the personal data provides an adequate level of data protection, in particular, by implementing contractual safeguards such as standard contractual clauses for data transfers which are approved by the European Commission.

## 10. Your rights

you have the right to ask Us to:

- (a) restrict our processing of your personal data;
- (b) object to our processing of your personal data;
- (c) request that we move your personal data to another organization;
- (d) object specifically to us using your personal data for profiling for direct marketing purposes; or
- (e) provide a copy of your personal data in an easily accessible format.
- (f) you also have the right to make a complaint about how we process your personal data to your data protection supervisory authority.
- (g) Where you have specifically consented to our use of your personal data, you have the right to withdraw that consent at any time. Please contact us if you want to do this.

## 11. Changes to this Privacy Notice

11.1. This *Privacy Notice* may be updated from time to time for any reason. We will notify you of any changes to our *Privacy Notice* by updating the *Privacy Notice* within the digital platforms. In the event of a material change to this *Privacy Notice*, you will be notified from within the digital platforms and asked to acknowledge your acceptance of the changes to the *Privacy Notice*.

11.2. In the event we are involved in a merger, acquisition, or sale of all or a portion of Our assets, you will be notified via email and/or in a prominent notice on our digital platforms of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

## 12. Contact Us and complaints

12.1. If you require any other information about any part of this notice, you can contact our Data Protection Officer at Royal Caribbean Cruises Ltd., 1050 Caribbean Way, Miami, Florida 33132, USA or via email at [privacy@rccl.com](mailto:privacy@rccl.com).

This privacy policy was last modified on May 20, 2020.

