

## Privacy Policy

At TUI Group, we are concerned about your privacy. This policy describes what, why and how we collect and use your personal data, how we protect it and how you can get in touch with us.

More to the point, this policy regulates the processing of data carried out by MEETINGS & EVENTS UK LIMITED (Trading as INTERCRUISES SHORESIDE & PORT SERVICES,-a legally constituted -British company registered at Wigmore House, Wigmore Lane, Luton, Bedfordshire, LU2 9TN, which operates as a travel agency, with Company Number 6018823 and tax (VAT) identification number 119544801) (hereinafter “**INTERCRUISES** ”), as a controller of your data and a company of TUI Group, through this website (hereinafter, the “**Website**”).

### **1. What are the purposes and lawful basis of the processing of your data carried out by INTERCRUISES?**

The data that INTERCRUISES requests or may request from you is necessary for the purposes described in this policy and failure to provide it may lead INTERCRUISES to be unable to contact you or manage your requests.

INTERCRUISES reserves the right not to respond or process requests that do not include all the data that is requested.

By providing INTERCRUISES with your data, you guarantee the veracity of the same and accept that INTERCRUISES may periodically request the review and update of personal data that you keep.

On this Website, you can find information that may be useful in order to learn about the services offered by INTERCRUISES. In this sense, INTERCRUISES will only request you and, therefore, will process the necessary data to provide you with the services you contracted or to be able to initiate and maintain a commercial and/or contractual relationship with you.

More to the point, the purposes for which your data may be processed by INTERCRUISES and the lawful basis for that processing is as follows:

- i. Performance of a contract between you and INTERCRUISES or application of pre-contractual measures:**
  - a. Manage the contractual relationship with you and ensure the provision of the contracted products and services, which includes both the management of reservations and services offered by INTERCRUISES, as well as the service quality, billing, collection and withdrawal of the same. Said purpose includes the processing of bookings and payment of products and services through INTERCRUISES, call centers, mobile communication systems based on GSM, GPRS or UMTS technology.
  - b. Inform you of any confirmation and/or alteration on the bookings made via the website and/or the call center as well as sending you any other notifications that you might have specifically requested in connection with the contracted products and services, including by electronic means.
  - c. Manage the commercial relationship with potential clients, attending to requests for information on products and services offered by INTERCRUISES.
  - d. Manage and process any legal claims, out-of-court claims and insurance claims received by INTERCRUISES in relation to you.

**ii. Consent:**

Carry out commercial communications to you by any means, including electronics means, based on your browsing and/or consumption habits. Said communications may refer to advertising or promotional material on products and services that are considered to be of your interest based on the aforementioned criteria.

**iii. Legitimate interests of INTERCRUISES:**

- a. Carry out commercial communications related to products and services similar to those contracted by you. In this case, the legitimate interest of INTERCRUISES would be to carry out direct marketing activities aimed at its clients, in accordance with Recital 47 of the General Data Protection Regulation.
- b. Conduct surveys and market studies to know the quality of our products or services and the preference of our clients. The legitimate interest of INTERCRUISES is to improve the commercial offer and experience to its clients.
- c. Manage and administer the Website, as well as improve the browsing experience of the Website. The legitimate interest of INTERCRUISES is to improve the efficiency of the Website.

**Data processing coupled with mere navigation through the Website**

In order to improve our services, to provide you with more relevant content and to analyze how visitors use this Website, we may use technologies, such as cookies or tracking software. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

Regarding the use of cookies on this Website, please note that the same are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on this Website and allow us to provide features such as remembering aspects of your last search to make subsequent searches faster. You can delete cookies if you wish. While certain cookies are necessary for viewing and navigating on this Website, most of the features will be still accessible without cookies.

For more information on how we use cookies and how you can remove them, read our Cookie Policy available at INTERCRUISES.

**2. Who are the third parties to which your personal data may be shared?**

The personal data that you provide to INTERCRUISES may be communicated to the following categories of recipients:

- Third parties to which INTERCRUISES is obliged to transmit information, such as public authorities, in order to comply with the requirements of said authorities and the applicable regulations, as the case may be.
- Contracted services suppliers, solely for administration reasons and card fraud checks in order to complete your booking.
- Companies that are part of the TUI Group, with the purpose of being able to properly manage and optimize your contractual relationship as a result of the centralization of administrative and computer processes existing within the TUI Group (whose relation you may consult on our webpage <https://www.tui.com/>)

Also, we inform you that the TUI Group can count on or collaborate with companies outside the European Union. In those cases, INTERCRUISES, as a company of TUI Group, requires that these companies comply with the measures designed to protect personal data established in a binding contract,

except in cases where the European Commission has determined that the country where said companies are located provide for an adequate level of protection of personal data.

Should you wish, you can obtain a copy of the measures required by INTERCRUISES by contacting our Data Protection Officer by the contact details indicated below.

### **3. How does INTERCRUISES protect your data?**

INTERCRUISES has appropriate policies and has put into place technical and organizational measures to safeguard and protect your personal data against illegal or unauthorized access, loss or accidental destruction, damage, use and illegal or unauthorized disclosure.

At INTERCRUISES, we will also take all reasonable precautions to ensure that our staff and employees who have access to your personal data have received adequate training.

In any case, please note that any transmission of data through the Internet is not completely secure and, as such, must be carried out at your own risk. Although we will do our best to protect your personal data, INTERCRUISES cannot guarantee the security of the personal data transmitted through this Website.

### **4. For how long does INTERCRUISES keep your data?**

The retention period of your data will be determined according to the duration of your contractual relationship with INTERCRUISES and the deadlines defined by law. In this sense, the criteria that INTERCRUISES uses to set the terms of retention of your data have been determined in accordance with the requirements established in the applicable legislation, regulations and guidelines, as well as the operational requirements of INTERCRUISES related to the correct management of the relationship with its customers. Whenever you give your consent, your data will be kept up until a moment when you revoke said consent.

### **5. How can you exercise the rights over your personal data?**

You may exercise your rights of access, rectification, erasure, objection, limitation and portability, as well as to withdrawal at any time the consents you have previously given us, by mail to MEETINGS & EVENTS UK LIMITED, Trading as INTERCRUISES, , at Wigmore House, Wigmore Lane, Luton, Bedfordshire, LU2 9TN, or by sending an email to [coaching@intercruises.com](mailto:coaching@intercruises.com). Should you wish, you may also contact our Data Protection Officer as the contact details indicated below.

Furthermore, if appropriate, you can lodge a claim to the Spanish Data Protection Authority, especially if you consider that we have not adequately addressed your rights.

### **6. How can you contact us?**

If you have questions or comments in relation to data protection matters, you may contact our Data Protection Officer, which contact details are as follows: Sandra Llansana, [gdprdx@tui.com](mailto:gdprdx@tui.com)

Last update: 27<sup>th</sup> of September 2018