

Privacy Policy

OK-Sailing O.E., Porto Lagos (Xanthi), Greece

Scope of Privacy Policy

OK Sailing O.E., AFM 801149838, headquartered at Porto Lagos, Xanthi, Greece, as the data controller, recognizes the importance of protecting your personal data. We are committed to carefully processing the personal data of our clients ("Your Data"). To provide the charter sailing service, we collect personal data about you on various occasions:

- Browsing on our website www.ok-sailing.com ;
- Reserving a boat;
- Entering into a boat rental agreement with you.

This Privacy Policy is based on Article 13 of the General Data Protection Regulation (Regulation (EU) 2016/679 or "GDPR"). To exercise your rights as a data subject under the provisions of the GDPR, please send an email to info@ok-sailing.com .

In cases of update, a notice will be published on our website, as well as the updated version of the policy.

For the purposes of this policy:

- "Personal data" means any information related to an identified or identifiable living individual ("data subject"). Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

- "Special categories of personal data" include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a person's sex life or sexual orientation.

Special categories of personal data will not be processed unless necessary for the performance of our statutory obligations, e.g., our obligations arising from labor or anti-discrimination legislation or to protect the legitimate interests of the data subject in the event of an incident during sailing.

Data that cannot be associated or linked to a specific individual are not "personal data".

What person information do we process?

The personal data we process includes:

Personal Information Provided by You: The personal information that we collect depends on the context of your interactions with us and the Services, that choices you make, and the products and features you use. The personal information may include the following: names,

date/place of birth, identity card number, nationality, gender.

Contact Information: The personal information may include the following: phone numbers, email addresses, mailing addresses, billing addresses.

Financial Information: The financial information may include your credit/debit card number or your bank account in connection with made payments.

Technical Information: The technical information may include data generated as a result of using our website or integrated applications (applications, plugins, etc.), as well as information related to materials and communications that we receive from you or send to you electronically.

Hobbies and Interests: We may collect information about your hobbies and interests.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

From which Sources We Collect your Personal Data?

The collection of your personal data may include:

1. Data direct provided by you collected when filling out and submitting the reservation form, using our website, through email communication, or when contacting us by phone or online on social media.
2. Data provided automatically are gathered through "Cookies" used by our website (www.ok-sailing.com).

How do we process your information?

We process your information to provide, improve and administer our services, communicate with you, for security and fraud prevention, contract agreement and to comply with law. We process your information only when we have a valid legal reason to do so. The main purposes for which we process personal data on this basis may be:

- Identification of the Client;
- Preparation of Documentation regarding the rental;
- Providing Additional Information regarding the characteristics and use of the services we offer;
- Preparation of Invoices and Financial Documents including bills and other financial and accounting documents;
- Tracking Payments;
- Contacting clients, suppliers and subcontractors;
- Providing Technical Advice and Information including advice for optimal and safe use of our services;
- Sending Messages, Newsletters, and Notifications;
- Coordinating Contract Execution Activities;
- Reviewing and Analyzing Complaints and Reports related to our services;
- Detecting and Preventing Unlawful Actions undertaken by clients;
- Preventing Unauthorized Disclosure, Use, Modification, or Destruction of confidential or otherwise protected information by law.

These processing activities are carried out based on the legal grounds established by relevant data protection regulations.

OK Sailing O.E. is obligated to comply with the requirements of Greek, European, and international maritime and yachting legislation including the provision of information about:

- Number of passengers and cabin crew and personal information about them;
- Arrival and departure of boats from the port;
- Information regulated by port state.

In this regard, we collect, process, and provide the required information to the government authorities.

OK Sailing O.E. collects personal data not only as a service provider but also as an employer and purchaser of goods and services. In this context, we process personal data to fulfill our specific obligations arising from or related to:

- Social security provision for our employees and subcontractors.
- Sale and lease of goods and services.
- Identification of clients when necessary to fulfill our obligations under the Anti-Money Laundering Act or the Law on Measures against the Financing of Terrorism.
- Legal accounting of the economic operations in which we participate, including taxation of supplies of goods and services made and received by us.
- Our obligation to assist competent authorities during their checks, audits, and inspections, as well as in all other cases where these authorities exercise their control powers on a lawful basis.

Do we collect information from minors?

We do not knowingly solicit data from or market to children under 18 years of age. By using the services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependents' use of the Services. We collect personal data from children under the age of 18, only with the consent of a parent or legal guardian in cases where the children are part of the passengers on board by boat provided by us.

If we become aware of any data collected from children under age 18 without the required parental consent, we will take immediate steps to delete such data from our records.

How long do we keep your information and when do we delete the data we collect from you?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). When we have no ongoing legitimate business need to process your personal information, we will delete such information.

The criteria for determining the storage period of your personal data include:

- (a) the period during which we maintain commercial relations with you and provide our services to you,
- (b) the retention periods prescribed in the applicable laws,

(c) the period for which it is necessary to retain the data in connection with the protection of our rights and legitimate interests in judicial and administrative proceedings, and the expiration of the respective statute of limitations (such as storing personal data contained in our accounting documentation for the periods provided in the Accounting Act)

How We Keep Your Information Safe?

We aim to protect your personal information through a system of a organizational and technical security measures. We have implemented appropriate and reasonable technical and organizational measures designed to protect the security of any personal information we process. This includes ensuring that our employees, subcontractors, and suppliers are obligated to maintain the confidentiality of the data. However, despite our safeguards and efforts to ensure your information, no electric transmission over the Internet of information storage technology, we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. You should only access the Services within a secure environment.

What are your privacy rights?

You have rights that allow you greater access to and control over your personal information under the General Data Protection Regulation (GDPR). You can make such a request by contacting us by using the contact details provided on our website. We will consider and act upon any request in accordance with applicable data and law protection laws. In cases where we receive repeated requests from you, we may refuse to take action on the request or may determine a fee (based on the costs we will incur), which you should pay for providing the information or communication or taking the requested actions.

Right to Access and Information

You have the right to request and receive the following data:

- Information about the purposes of processing your personal data, what categories of personal data we process, and who are the recipients or categories of recipients to whom your personal data are or will be disclosed, as well as any information regarding the source of your personal data.
- A copy of your personal data that we process, in electronic or other suitable form.

Right to Rectification

If you find that the personal data we process is inaccurate and/or incomplete, you have the right to have the data rectified.

Right to Object

Individuals have the right to object to the processing of their personal data if they believe their fundamental rights and freedoms outweigh the legitimate interests of the data controller. This right allows individuals to request that their personal data not be processed for specific purposes, such as direct marketing or profiling. We will cease such processing without undue delay and erase your data unless we provide legitimate reasons to continue processing your

data that outweigh your rights and interests or if the processing of your personal data is necessary for the establishment, exercise, or defense of legal claims.

Right to Restriction of Processing

You have the right to request the restriction of processing of your personal data if one of the following conditions applies:

- The accuracy of the personal data is contested by you, and the data controller needs time to verify the accuracy of the data.
- The processing is unlawful, but you oppose the erasure of the data and requests restriction instead.
- The data controller no longer needs the personal data for its original purpose, but you require the data for the establishment, exercise, or defense of legal claims.
- You have objected to the processing (as discussed earlier), and the data controller is considering whether its legitimate grounds override your interests.

Right of Erasure (Right to Be Forgotten)

You have the right to request us to erase or remove your personal data, and we are obligated to erase them immediately in the following circumstances:

- When personal data is no longer necessary for the purpose for which it was originally collected or processed.
- When you withdraw consent on which the processing is based, and there is no other legal ground for the processing.
- When you object to the processing of their personal data, and there are no overriding legitimate grounds for the processing.
- When personal data has been unlawfully processed.
- When personal data must be erased to comply with a legal obligation under EU law or the law of a Member State to which the data controller is subject.

In some cases, we may not be able to fulfill your request if the processing of your personal data is necessary for:

- Exercising the right to freedom of expression and the right to information.
- Compliance with our legal obligation.
- The establishment, exercise, or defense of legal claims.

Right to Withdraw Consent

You have the right to withdraw your consent at any time by contacting us. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Upon withdrawal of consent, we will cease processing your personal data for the purposes to which you have withdrawn consent.

Data Portability

You have the right to receive a copy of your personal data that you have provided to us in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another data controller without hindrance from us, where technically feasible.

Right to Lodge a Complaint

If you believe that your data protection rights have been violated or if you have concerns about how your personal data is being processed, you have the right to lodge a complaint with the appropriate supervisory authority.

How can you contact us about this notice?

For any inquiries related to the processing of your personal data or the exercise of your rights, you may contact us by:

- Email: info@ok-sailing.com

- Post: OK-Sailing O.E., 67150 Porto Lagos, Xanthi Region, Greece.

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