

INFORMATION ON THE PROCESSING OF PERSONAL DATA

INFORMATION ON THE PROCESSING OF PERSONAL DATA	1
TITLE, PURPOSE, and LEGAL BASIS OF TREATMENT.	1
PLACE OF DATA PROCESSING	2
CATEGORIES OF PERSONAL DATA	2
COOKIES USED BY THIS SITE	4
PRINCIPLES APPLICABLE TO DATA PROCESSING BY ALBATROSS	4
1. INQUIRIES, QUOTES AND CONTACTS	4
2. PROVISION OF SERVICES OR TOURIST PACKAGES	5
3. REGISTRATION, ACCESS AND MANAGEMENT OF THE RESTRICTED AREA	5
4. MANAGEMENT OF CONTRACTUAL AND COMMERCIAL RELATIONSHIPS WITH PARTNERS	6
5. FEEDBACK SECTION - REVIEWS	7
6. SENDING COMMERCIAL COMMUNICATIONS	7
SOCIAL PLUG-IN	7
MODE OF TREATMENT	8
DATA TRANSFER TO COUNTRIES OUTSIDE THE EUROPEAN UNION	8
CATEGORIES OF PERSONS TO WHOM THE DATA MAY BE DISCLOSED (RECIPIENTS)	8
RIGHTS OF INTERESTED PARTIES	8

TITLE, PURPOSE, and LEGAL BASIS OF TREATMENT.

Albatros Top Boat S.r.l. (hereinafter, ALBATROS), in the figure of its Legal Representative *pro tempore*, Via Fiume, 6, 28925 Verbania (VB), P.IVA 01819900034, e-mail privacy@albatrostopboat.com, is the **Data Controller** of the personal data of users collected when using the services of the following Websites www.albatrostopboat.com, www.luxuryyachtmaldives.com, www.maldivesforyou.com, from the management of questionnaires and data collection forms Albatros will process the personal data it comes into contact with in accordance with the principles of lawfulness, correctness and transparency as well as the provisions of the law and regulations for the following purposes:

- Internet site access and navigation;
- inquiries, quotes, and contacts;

- Registration, access and management of the restricted area, resulting in the management of reservations and the activities arising from them
- Sending commercial communications;
- feedback section;
- Filling out customer questionnaires (pre-boarding form, liking).

In detail, the use of personal data for accessing the site and browsing activities, as well as the completion of the various (online) questionnaires, involve the processing of data to give effect to measures taken at the request of the data subject, which is the legal basis that legitimizes the processing. The use of personal data for the management of further processing, with an indication of the specific legal basis of the processing, are described in the section of this policy dedicated to the principles applicable to data processing by Albatros.

PLACE OF DATA PROCESSING

Processing related to the web services of this Site takes place at the aforementioned registered office of the Data Controller and at the *hosting* company providing the service.

CATEGORIES OF PERSONAL DATA

Navigation data

The computer systems and *software* procedures used to operate this *website* acquire, in the course of their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This information is not collected in order to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes IP addresses or domain names of the computers used by users connecting to the site, the *URI (Uniform Resource Identifier)* notation addresses of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the *server* (successful, error, etc.) and other parameters related to the user's operating system and computer environment.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of computer crimes against the site or the

Owner: except for this eventuality, at present, data on *web* contacts do not persist beyond the terms of the law.

Data voluntarily provided by the user

The optional, specific and voluntary sending of electronic mail to the addresses indicated in this site entails the subsequent acquisition of the sender's address by Albatros, necessary to respond to requests, as well as any other personal data included in the communication.

Personal data collected through special forms, the "book" section and/or the request for quotes

By means of the functionalities present within the Albatros website, in particular by means of filling in appropriate data collection forms, the user may grant some of his or her own personal information which may make him or her identifiable and which may be processed in order to manage, for example, the latter's requests.

Among the information that may be requested are, but are not limited to, personal data such as:

- First and Last Name;
- Phone number and e-mail address;
- Data related to the health of the data subject, particularly with regard to the request for information on diving and/or other sports activities for which knowledge of the health condition of the natural person is necessary to assess the suitability of the natural person to perform such activities.

Personal data collected through special forms (pre-boarding and/or liking)

Customers' personal data may also be transmitted to Albatros by means of special questionnaires (especially by means of the so-called "Pre-boarding form" and "liking form"), which are sent to customers through special links.

The purpose of the pre-boarding form is to collect useful information before the trip or the start of the purchased activity in order to make the service as close as possible to the needs of the individual customer.

The liking form, on the other hand, is sent to the client always through a special link, in order to collect opinions and/or possible improvement actions on the services offered by Albatros.

Among the information that may be requested are, but are not limited to, personal data such as:

- First and Last Name;
- Phone number and e-mail address;

- Data related to the health of the data subject, particularly with regard to the request for information on diving and/or other sports activities for which knowledge of the health condition of the natural person is necessary to assess the suitability of the natural person to perform such activities.

COOKIES USED BY THIS SITE

To take a look at the Site's cookie usage policy, you can consult the following <https://www.luxuryyachtmaldives.com/cookie-policy/>

PRINCIPLES APPLICABLE TO DATA PROCESSING BY ALBATROSS

Albatros will process users' personal data lawfully, fairly, and transparently.

The Owner will collect personal data from users and process them only for the purposes set forth in this Privacy Policy and in a manner that is not incompatible with those purposes.

The data processed by Albatros are adequate, relevant, and limited to what is necessary for the purposes for which they are processed, including:

1. INQUIRIES, QUOTES AND CONTACTS

The Data Controller will process the personal data of users who fill out the appropriate online *forms* for requesting information regarding initiatives, projects, products or services offered by Albatros in order to manage, respond to and provide what has been requested by the data subject.

The user has the opportunity to provide additional information, including data of a special nature (e.g., health data, the disclosure of which is not mandatory for the purpose of sending the request for information regarding diving and/or other sports activities, but in any case necessary for the purpose of assessing the suitability of the person concerned to perform the requested activity). Such additional data will be processed by Albatros in accordance with the requirements of current legislation. In particular, the data will be recorded, kept and used to respond to requests from interested parties and for the time necessary to achieve the aforementioned purpose.

The legal basis for this processing is the execution of pre-contractual measures taken at the request of the data subject (Art. 6(1)(b) GDPR)

For personal data of a particular nature, however, the legal basis for processing is the consent of the data subject (Art. 9(2)(a), GDPR).

The provision of data of any nature for this processing purpose is optional. However, failure, partial or inaccurate provision of data may result in Albatros being unable to handle and follow up on user requests.

2. PROVISION OF SERVICES OR TOURIST PACKAGES

The Data Controller will process the personal data of users who, as a result of purchasing a package and/or tourist service, fill out the appropriate online *forms* for the collection of information whose knowledge, on the part of the Data Controller, is necessary for the purpose of providing the service requested by the data subject.

In particular, as a result of the conclusion of a contract or, in any case, the purchase of a service and/or tourist package, regardless of whether it was purchased directly from Albatros or from a partner of the latter (e.g. Travel Agencies), it is necessary to collect certain personal data, in order to execute the customer's request (i.e. the fruition of the purchased service and/or tourist package).

Personal data of users who fill out the liking form, on the other hand, are processed by the owner for the purpose of service improvement

The user also has the option of also providing personal data of a special nature (e.g., health data, the communication of which is necessary for the purpose of assessing the suitability of the person concerned to perform the requested activity, and/or in order to inform hotel facilities and/or partners of the existence of any allergies and/or intolerances of the person concerned and/or particular conditions that prevent the proper safe performance of the requested service).

Such data will be processed by Albatros in accordance with the requirements of the then applicable legislation

In particular, the data will be recorded, kept and used to respond to the requests of data subjects and for the time necessary to achieve the mentioned purpose. The legal basis for this processing is the execution of pre-contractual measures taken at the request of the data subject (Art. 6(1)(b) GDPR).

For personal data of a particular nature, however, the legal basis for processing is the consent of the data subject (Art. 9(2)(a), GDPR).

The provision of data of any nature for this processing purpose is optional. However, failure, partial or inaccurate provision of data may result in Albatros being unable to handle and follow up on user requests.

3. REGISTRATION, ACCESS AND MANAGEMENT OF THE RESTRICTED AREA

Albatros will process the user's personal data to enable the use of services reserved for registered users. For this purpose Albatros will process users' personal data to:

- Allow the user to access and navigate the Site;

- allow the user to access the Site and browse as a logged-in user, recognizing the user regardless of the device used;
- Maintain and manage the user's account;
- Store user data and information in the account;
- store in the account of the logged-in travel agency the personal data (first name, last name, and social security number) of customers who have purchased Albatros services through the agency;
- Follow up reservation requests, with the execution of the various activities consequent to the request (by way of example but not limited to, recording the reservation in the history, invoicing, payment).

The legal basis for this processing is the performance of the contract or, as the case may be, the execution of pre-contractual measures taken at the request of the data subject (Art. 6(1)(b), EU Reg. 2016/679).

For these purposes, the data will be processed for the time strictly necessary to carry out the individual processing activities. However, Albatros may retain the data for the purposes and for the maximum retention periods indicated in this policy or in the cases established by the Regulations and/or the law.

The provision of data for the purpose in question is optional, however, since the processing is necessary to allow access to the Site and/or navigation as a logged-in user and/or the provision of account management and maintenance services, failure to provide the data will result in the inability of the user to register, access the restricted area of the Site and use the services reserved for registered users.

4. MANAGEMENT OF CONTRACTUAL AND BUSINESS RELATIONSHIPS WITH PARTNERS

Albatros, as part of its contractual and business relationships with its affiliated partners (by way of example but not limited to, agencies, stores, etc.) may process personal data (specifically, contact data) of employees and/or collaborators of the partners, for example by following up on a booking request and/or as a result of the conclusion of a contract by the employee and/or collaborator.

The provision of data for the purpose in question is optional, however, since the communication of these data is necessary for the execution of the request, failure to provide the data will result in the inability to follow up on the reservation request and/or conclusion of the contract.

5. FEEDBACK SECTION - REVIEWS

The interested party may give, by filling in the appropriate online form or by filling in the liking form, a review about the travel experience he or she had with Albatros. In these cases, the first name, last name and the content of the message, i.e. the review, is requested to be published in some dedicated sections of the Owner's website

It is possible that the user provides additional information, which will be processed by Albatros in accordance with the requirements of the applicable legislation in force. The legal basis for the processing is the execution of pre-contractual measures taken at the request of the data subject (Art. 6(1)(b) GDPR)

6. SENDING COMMERCIAL COMMUNICATIONS

Subject to the consent of the interested party exercised by means of the appropriate tick in the *form* for data collection, Albatros will process the user's personal data (personal and contact details) to send communications, including in the form of newsletters, pertaining to the initiatives, projects, products or services offered by Albatros and the relevant data will be recorded, kept and used exclusively for communications to promote the activities, initiatives and projects promoted by the Owner.

The legal basis for this processing is the consent of the data subject (Art. 6(1)(a), GDPR). Providing consent for this purpose is optional and the data will be processed until the data subject's consent is revoked, which can be exercised at any time (by clicking *unsubscribe* at the bottom of the communication received or by written request to the address privacy@albatrostopboat.com)

SOCIAL PLUG-IN

This website uses so-called "*social plug-ins*".

"*Social plug-ins*" are specific tools that allow *social network* functionality to be incorporated directly within the website.

All "*social plug-ins*" on the site are marked with the respective logo owned by the social networking platform.

When you visit a page on our site and interact with the "*plug-in*" or decide to leave a comment through the Social platform, the corresponding information is transmitted from your *browser* directly to the relevant social platform and stored by it.

For information on the purpose, type and manner of collection, processing, use and storage of personal data by the *Social Network* platform, as well as how to exercise your rights, please refer to the *Social Network's* specific *Privacy Policy*.

MODE OF TREATMENT

Personal data are and will be processed, in paper and/or digital form, for as long as is strictly necessary to achieve the purposes and purposes for which they were collected.

No automated processing of collected data, including user profiling, is active

Specific security measures are observed to prevent data loss, illegal or incorrect use, and unauthorized access.

DATA TRANSFER TO COUNTRIES OUTSIDE THE EUROPEAN UNION

Personal data collected by Albatros are processed and stored within the territory of the European Union. Some personal data may be subject to transfer to recipients located outside the European Economic Area. In this case, the transfer will take place in compliance with the provisions of Chapter V of the EU Regulation 2016/679 ("GDPR"); in particular, the data will be transferred only after signing the Standard Contractual Clauses approved by the EU Commission by Decision No. 2021/914/EU or to countries able to guarantee an adequate level of protection of personal data and recipients therefore of an Adequacy Decision adopted by the EU Commission.

CATEGORIES OF PERSONS TO WHOM THE DATA MAY BE DISCLOSED (RECIPIENTS)

The individuals to whom Albatros may communicate data act as Data Processors designated through specific agreements or as persons authorized to process personal data by the Data Controller. The data may be communicated to external Companies and/or Professionals in order to fulfill specific obligations imposed on the Controller by current regulations

Finally, personal data, including those of a particular nature (in the specific health care that may be collected), may be disclosed to subsidiaries and/or investees of the Owner.

More specifically, the communication of any health information to other companies involved in performing the service requested by the user (food allergies and/or health conditions that may affect any sports activities) may be necessary in order to tailor that service to the specific needs of the data subject. In these cases, the aforementioned companies will act as autonomous controllers for the processing pertaining to their own sphere of competence.

A data subject, by requesting access to his or her personal data, can obtain the list of recipients of his or her personal data by writing an e-mail to privacy@albatrostopboat.com

RIGHTS OF INTERESTED PARTIES

Interested users of the Site have the right, pursuant to Articles 15-22 GDPR, to:

- **Request for access to personal data:** you have the right to obtain from the Data Controller confirmation as to whether or not personal data concerning you is being processed and, if so, access to that data. Access may be directed to obtain the following information:

- The purposes of processing;
 - The categories of personal data in question;
 - The recipients or categories of recipients to whom the data have been or will be disclosed, particularly if destined for third countries or international organizations;
 - The retention period of personal data or the criteria used to determine this period;
 - The existence of the right to request from the Data Controller the rectification or erasure of data or the restriction or opposition to the processing of data;
 - The existence of automated decision making.
- **Request for rectification of personal data:** the data subject has the right to obtain rectification of inaccurate personal data concerning him or her, as well as to obtain supplementation of incomplete personal data.
 - **Request for erasure of personal data:** for the reasons stated in Article 17 GDPR, the data subject has the right to request the Data Controller to erase the data without undue delay, and the Data Controller has the obligation to erase the personal data of the data subject, provided that there is no *ex lege* storage obligation on the data.
 - **Request for restriction of data processing:** in case one of the cases referred to in Article 18 GDPR occurs, the data subject has the right to request the restriction of data processing concerning him or her.
 - **Request for data portability:** the data subject has the right to receive in a structured, commonly used and readable format, personal data concerning him or her that has been provided to a Data Controller and has the right to transmit such data to another Data Controller if the processing is based on consent, on a contract or is carried out by automated means.
 - **Request to object to processing:** the data subject has the right to object to the processing of personal data concerning him or her at any time, on grounds related to his or her particular situation.
 - **Withdrawal of consent:** the data subject has the right, at any time and as easily as he or she gave it, to withdraw consent to the processing of his or her personal data.

The data subject also has the right to file a complaint with the Italian Data Protection Authority (www.garanteprivacy.it)

Requests for the exercise of the above rights by the interested party may be made to privacy@albatrostopboat.com

[This privacy policy is current as of February 1, 2025.](#)