

## **Sail Ionian (SI) Privacy Policy**

SI Privacy Policy sets out what information we collect, how we collect it and what we do with it once it has been collected.

We have tried to keep this summary brief and in plain English, as this document is under regular review we would be pleased to hear suggestions to improve its clarity or content.

### **INFORMATION ABOUT YOU**

#### **Your Information:**

This refers to information such as your name, contact details, travel preferences and special needs/disabilities/dietary requirements that you supply us or is supplied to us, including any information about other persons on your booking relating to the same ("your information"). Your information is collected when you request information from us, contact us (and vice versa) or make a booking with us. You are responsible for ensuring that other members of your party are aware of the content of our Privacy Policy and consent to your acting on their behalf in all your dealings with us. We will update your information whenever we get the opportunity to keep it current, accurate and complete. We only collect information relevant and necessary to your holiday or travel booking.

#### **Financial information**

We do not request, hold or retain credit or debit card information. All payments made in this manner are carried out via a secure server on our website or in person in our office. Our web secure payment service is maintained by independent service providers and is regularly checked for PCI DSS compliance.

#### **Use of Your Information:**

We only use information supplied for providing you with our services, including your flight, yacht charter, vacation or insurance, etc.

Services include business administration, contacting you when necessary, customer care, improvement of service, risk assessment, security and crime prevention/detection, dispute resolution, credit checking and debt collection.

We may contact you before during and shortly after your holiday for the purposes of research and analysis and we may invite you to join our marketing lists, and pass comment on your experience with ourselves to monitor our performance.

Please note that our websites will assume you to agree to e-communications and telephone communications when you make a booking.

Your information will not be used for any other purpose than servicing your holiday as set out in this document and will not be passed to any third party except for reasons specified in this document.

#### **Disclosures to third parties**

We may disclose your information to our service providers if necessary. For you to travel overseas, it may be mandatory (as requested Government authorities at the point(s) of departure and/or destination) to disclose your information for immigration, security and anti-terrorism purposes, or any other purposes which they determine appropriate. Even if not mandatory, we may exercise our discretion to assist where appropriate. It is also necessary to provide your information to government authorities, to meet the yacht charter paperwork and accounting requirements.

### **Sensitive Information**

Some of your information (such as health or religion) may be considered “sensitive personal data”. We collect it to cater to your needs or act in your interest, and we are only prepared to accept sensitive personal data from you on the condition that we have your positive consent. By booking with us you also agree for your insurers, their agents and medical staff to disclose relevant information (which may contain sensitive personal data) to us in circumstances where we need to act in the interest of everyone in the group you are traveling with. For example, if your illness during your vacation is infectious we may need to make special arrangements for you and ensure that you do not return with the group immediately.

### **Retention of information**

Personal data in relation to a holiday or travel booking will be archived, when no longer generally required. Paper copies will be removed to secure storage at the end of each year. Digital data will be archived two seasons after completion of the booking, achieving will remove access from all but the most senior staff. Exceptions to this are where legally data must be retained. The retention period will be reviewed on a regular basis and obsolete data destroyed.

### **Marketing material**

When you make a booking with SI you will be given the opportunity to “opt in” to permit us from time to time contact you with information on offers of goods and services, brochures, new products, forthcoming events or competitions from SI.

With all marketing material supplied you will be given the opportunity to indicate that you no longer wish to receive our direct marketing material.

If do not wish to receive such information or would like to change your preference, please refer to point (2) of “Your Rights” below.

### **Your rights**

You have the right to ask in verbally or in writing by contacting us to request a copy of the information we hold about you and to correct any inaccuracies in your information.

You have the right to ask verbally in writing or by email not to receive marketing material about our products and services. Once properly notified by you, we will take steps to stop using your information in this way.

### **Monitoring**

To ensure that we carry out your instructions accurately, to help improve our service and in the interest of security, we may monitor and/or record: (1) your telephone calls; (2) customer activities using CCTV recording equipment in and around our premises; and (3)

customer transactions and activities on our website. All recordings are and shall remain our sole property and be held in secure storage for the minimum time necessary.

### **Security of information**

We have taken all reasonable steps to have in place appropriate technical and organizational safeguards to protect your information. Paper copies of information are only retained as required by law and these are stored under lock and key. Digital copies of material are held on secure password protected servers. Access to information is restricted to those who “need to know”.

### **Breach of Security**

If we suspect any data held by yourselves relating to you has been stolen misplaced or in any other way copied, we will immediately inform you.

### **Changes to this policy**

Any changes to this Policy will be either posted on our website, brochure and/or made available upon request.

### **Data from other sources**

We will not solicit personal data from other sources. If travelling as a group, it is generally expected the party leader will provide information for the whole group. It is the party leaders’ responsibility to obtain consent from all in the group to pass on the information required, we assume this consent has been obtained. If we have reasonable doubt that any personal information provided from any source doesn’t have full consent, we will make the party aware we have received the information and destroy as necessary.

### **Agreement**

If you do not agree to Our Use of Your Information above, we cannot do business with you or accept your booking.

### **Correspondence**

Please address correspondence to “The Directors”.

The main office address and the address for any customer correspondence or service of any documents for **Sail Ionian** is Vliho Lefkas 31084 Greece. Tel 0030 26450 95137 OR 0044 800 231 3800. The full company name is N and D Bingham OE Sail Ionian with registered office 9 Evangelistrias Street, Corfu, 49100 Greece.

### **Complaints**

If you feel data is being incorrectly retained, transmitted or used in any way that is not acceptable please contact us in the first instance. If the issue cannot be resolved, you have the right to lodge a complaint with the “Data protection Agency” (DPA).

**Privacy Policy: v May 2018**