

Fosnavåg, 07.01.2025

1. Introduction

We respect your privacy and are committed to protecting it through our compliance with this privacy policy ("Policy"). This Policy describes the types of information we may collect from you or that you may provide ("Personal Information") on the havilavoyages.com website ("Website" or "Service") and any of its related products and services (collectively, "Services"), and our practices for collecting, using, maintaining, protecting, and disclosing that Personal Information. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update it.

This Policy is a legally binding agreement between you ("User", "you" or "your") and Havila Kystruten Operations AS (doing business as "Havila Voyages", "we", "us" or "our").

If you are entering into this Policy on behalf of a business or other legal entity, you represent that you have the authority to bind such entity to this Policy, in which case the terms "User", "you" or "your" shall refer to such entity. If you do not have such authority, or if you do not agree with the terms of this Policy, you must not accept this Policy and may not access and use the Website and Services.

By accessing and using the Website and Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

When we collect your personal data, we are acting as a data controller.

Havila Kystruten Operation AS
Mjølstadnesvegen 24,
6092 Fosnavåg, Norway

2. Automatic collection of information

When you open our website, we automatically store information that your browser sends. This data may include information such as: your device's IP address, browser type, and

version, operating system type and version, language preferences or referrals page, and which pages of our website you visit, the time spent on those pages, access times and dates, and other statistics.

Information collected automatically is used only as part of our analysis and statistical information regarding the usage and traffic of the Website and protect our servers from abuse and malicious users.

3. Collection of personal information

We receive and store any information you knowingly provide to us when you create an account, make a purchase, or fill any forms on the Website. When required, this information may include the following:

- Account details (such as user name, unique user ID, password, etc)
- Contact information (such as email address, phone number, etc)
- Basic personal information (such as name, country of residence, etc)
- Date of Birth
- Food Preferences and Allergens
- Proof of identity (such as a photocopy of a government ID)
- Payment information such as credit card details, bank details, etc
- Geolocation data of your device (such as latitude and longitude)
- Information about other individuals (such as your family members, friends, etc)
- Any other materials you willingly submit to us (such as articles, images, feedback, etc)

Personal data collected when you use our services in addition to the above, may include:

- CCTV data for security purposes on our vessels
- Passport Photo stored in our system for security purposes

Your transaction data, like credit card information and purchase history, will be collected by our payment service providers and our booking engine provider. Details below.

Some of the information we collect is directly from you via the Website. However, we may also collect Personal Information about you from other sources. Personal Information we collect from other sources may include demographic information, such as age and gender, device information, such as IP addresses, location, such as city and state, page view information and search results and links.

You can choose not to provide us with your Personal Information. Users who are uncertain about what information is mandatory are welcome to contact us.

4. Use and processing of collected information

We act as a data controller and a data processor when handling Personal Information, unless we have entered into a data processing agreement with you in which case you would be the data controller and we would be the data processor.

Our role may also differ depending on the specific situation involving Personal Information. We act in the capacity of a data controller when we ask you to submit your Personal Information that is necessary to ensure your access and use of the Website and Services. In such instances, we are a data controller because we determine the purposes and means of the processing of Personal Information.

In order to make the Website and Services available to you, or to meet a legal obligation, we may need to collect and use certain Personal Information. If you do not provide the information that we request, we may not be able to provide you with the requested products or services. Any of the information we collect from you may be used for the following purposes:

- Create and manage user accounts
- Fulfill and manage orders
- Deliver products or services
- Improve products and services
- Provide you with offers and additional services
- Fulfill a refund request
- Send marketing and promotional communications
- Send product and service updates
- Respond to inquiries and offer support
- Request user feedback
- Improve user experience
- Post customer testimonials
- Enforce terms and conditions and policies
- Protect from abuse and malicious users
- Respond to legal requests and prevent harm
- Run and operate the Website and Services
- Ensure you and fellow passengers, as well as crew, travel safely on-board our vessels

Processing your Personal Information depends on how you interact with the Website and Services, where you are located in the world and if one of the following applies:

(a) you have given your consent for one or more specific purposes; (b) provision of information is necessary for the performance of this Policy with you and/or for any pre-contractual obligations thereof; (c) processing is necessary for compliance with a legal obligation to which you are subject; (d) processing is related to a task that is carried out in the

public interest or in the exercise of official authority vested in us; (e) processing is necessary for the purposes of the legitimate interests pursued by us or by a third party. We may also combine or aggregate some of your Personal Information in order to better serve you and to improve and update our Website and Services.

We rely on the following legal bases upon which we collect and process your Personal Information:

- User's consent
- Performance of a contract
- Compliance with the law and legal obligations
- Our own legitimate interests

Note that under some legislations we may be allowed to process information until you object to such processing by opting out, without having to rely on consent or any other of the legal bases above. In any case, we will be happy to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Information is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

5. Payment processing

In case of Services requiring payment, you may need to provide your credit card details or other payment account information, which will be used solely for processing payments. We use third-party payment processors ("Payment Processors") to assist us in processing your payment information securely.

Payment Processors adhere to security standards as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. Sensitive and private data exchange happens over a secured communication channel and is encrypted and protected with digital signatures, and the Website and Services are also in compliance with strict vulnerability standards in order to create as secure of an environment as possible for Users. We will share payment data with the Payment Processors only to the extent necessary for the purposes of processing your payments, refunding such payments, and dealing with complaints and queries related to such payments and refunds.

Please note that the Payment Processors may collect some Personal Information from you, which allows them to process your payments (e.g., your email address, address, credit card details, and bank account number) and handle all the steps in the payment process through their systems, including data collection and data processing. The Payment Processors' use of your Personal Information is governed by their respective privacy policies which may or may not contain privacy protections as protective as this Policy. We suggest that you review their respective privacy policies.

You can find information about the payment services providers' privacy policies and practices at:

- <https://worldline.com/en/compliance/privacy>

6. Managing information

You are able to delete certain Personal Information we have about you. The Personal Information you can delete may change as the Website and Services change. When you delete Personal Information, however, we may maintain a copy of the unrevised Personal Information in our records for the duration necessary to comply with our obligations to our affiliates and partners, and for the purposes described below. If you would like to delete your Personal Information or permanently delete your account, you can do so on the settings page of your account on the Website.

7. Disclosure of information

Depending on the requested Services or as necessary to complete any transaction or provide any Service you have requested, we may share your information with our trusted subsidiaries and partners, contracted companies, and service providers (collectively, "Service Providers") we rely upon to assist in the operation of the Website and Services available to you and whose privacy policies are consistent with ours or who agree to abide by our policies with respect to Personal Information. We will not share any information with unaffiliated third parties.

Service Providers are not authorized to use or disclose your information except as necessary to perform services on our behalf or comply with legal requirements. Service Providers are given the information they need only in order to perform their designated functions, and we do not authorize them to use or disclose any of the provided information for their own marketing or other purposes. We will share and disclose your information only with the following categories of Service Providers:

- Cloud Computing and Data Storage Services
- Financial services
- Government agencies and authorities
- Payment processors
- Product engineering and design services
- User authentication services
- Website service providers

We may also disclose any Personal Information we collect, use or receive if required or permitted by law, such as to comply with a subpoena or similar legal process, and when we

believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

In the event we go through a business transition, such as a merger or acquisition by another company, or sale of all or a portion of its assets, your user account, and your Personal Information will likely be among the assets transferred.

8. Retention of information

We will retain and use your Personal Information for the period necessary to comply with our legal obligations, as long as your user account remains active, to enforce our Policy, resolve disputes, and unless a longer retention period is required or permitted by law up to a maximum of 60 months.

We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification, and the right to data portability cannot be enforced after the expiration of the retention period.

9. Transfer of information

Depending on your location, data transfers may involve transferring and storing your information in a country other than your own. However, this will not include countries outside the European Union and European Economic Area. If any such transfer takes place, you can find out more by checking the relevant sections of this Policy or inquire with us using the information provided in the contact section. Note that we are dedicated to ensuring the security of your personal data, adhering strictly to the guidelines outlined in our privacy notice and conforming to the applicable legal requirements.

10. Region specific notices

Out of respect for your privacy, we have implemented measures to comply with the obligations and rights associated with the collection of Personal Information as dictated by the laws governing EU/EEA and the UK.

10.1 Disclosures for residents of the EU/EEA and the UK

If you are a resident of the European Union (“EU”), the European Economic Area (“EEA”), or the United Kingdom, you have certain rights in relation to your Personal Information based on the the GDPR and the UK DPA that we comply with as part of our commitment to your privacy. Unless otherwise expressly stated, all terms in this section have the same meaning as defined in the GDPR and the UK DPA.

(a) Right to withdraw consent: You have the right to withdraw consent where you have previously given your consent to the processing of your Personal Information. To the extent that the legal basis for our processing of your Personal Information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

(b) Right to access: You have the right to learn if your Personal Information is being processed by us, obtain disclosure regarding certain aspects of the processing, and obtain a copy of your Personal Information undergoing processing.

(c) Right to rectification: You have the right to verify the accuracy of your information and ask for it to be updated or corrected. You also have the right to request us to complete the Personal Information you believe is incomplete.

(d) Right to object to the processing: You have the right to object to the processing of your information if the processing is carried out on a legal basis other than consent. Where Personal Information is processed for the public interest, in the exercise of an official authority vested in us, or for the purposes of the legitimate interests pursued by us, you may object to such processing by providing a ground related to your particular situation to justify the objection. You must know that, however, should your Personal Information be processed for direct marketing purposes, you can object to that processing at any time without providing any justification. To learn whether we are processing Personal Information for direct marketing purposes, you may refer to the relevant sections of this Policy.

(e) Right to restrict to the processing: You have the right, under certain circumstances, to restrict the processing of your Personal Information. These circumstances include: the accuracy of your Personal Information is contested by you and we must verify its accuracy; the processing is unlawful, but you oppose the erasure of your Personal Information and request the restriction of its use instead; we no longer need your Personal Information for the purposes of processing, but you require it to establish, exercise or defend your legal claims; you have objected to processing pending the verification of whether our legitimate grounds override your legitimate grounds. Where processing has been restricted, such Personal Information will be marked accordingly and, with the exception of storage, will be processed only with your consent or for the establishment, to exercise or defense of legal claims, for the protection of the rights of another natural, or legal person or for reasons of important public interest.

(f) Right to delete: You have the right, under certain circumstances, to obtain the erasure of your Personal Information from us. These circumstances include: the Personal Information is

no longer necessary in relation to the purposes for which it was collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure such as where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, to exercise or defense of legal claims.

(g) Right to data portability: You have the right to receive your Personal Information that you have provided to us in a structured, commonly used, and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance from us, provided that such transmission does not adversely affect the rights and freedoms of others.

(h) Right to complaint: You have the right to complain to a data protection authority about our collection and use of your Personal Information. If you are not satisfied with the outcome of your complaint directly with us, you have the right to lodge a complaint with your local data protection authority. For more information, please contact your local data protection authority in the EU or the EEA. This provision is applicable provided that your Personal Information is processed by automated means and that the processing is based on your consent, on a contract which you are part of, or on pre-contractual obligations thereof.

11. How to exercise your rights

Any requests to exercise your rights can be directed to us through the contact details provided in this document. Please note that we may ask you to verify your identity before responding to such requests. Your request must provide sufficient information that allows us to verify that you are the person you are claiming to be or that you are the authorized representative of such person. If we receive your request from an authorized representative, we may request evidence that you have provided such an authorized representative with power of attorney or that the authorized representative otherwise has valid written authority to submit requests on your behalf.

You must include sufficient details to allow us to properly understand the request and respond to it. We cannot respond to your request or provide you with Personal Information unless we first verify your identity or authority to make such a request and confirm that the Personal Information relates to you.

11.1 How long will it take

When you request to exercise your rights, we are obligated to:

1. Provide information on action taken without undue delay.
2. In any event, within one month of receipt of the request.

3. The one month period may be extended by two further months, where necessary, taking into account the complexity and number of requests. In this case, we will inform you of any extension within one month of receiving your request, and explain the reasons for the delay.
4. If we decide not to take action on foot of your request, we will inform you without delay and at the latest, within one month of receipt of your request, the reasons for not taking action.

12. Cookies

Our Website and Services use “cookies” to help personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. If you choose to decline cookies, you may not be able to fully experience the features of the Website and Services.

We may use cookies to collect, store, and track information for security and personalization, to operate the Website and Services, and for statistical purposes. Please note that you have the ability to accept or decline cookies. Most web browsers automatically accept cookies by default, but you can modify your browser settings to decline cookies if you prefer.

13. Data analytics

Our Website and Services may use third-party analytics tools that use cookies, web beacons, or other similar information-gathering technologies to collect standard internet activity and usage information. The information gathered is used to compile statistical reports on User activity such as how often Users visit our Website and Services, what pages they visit and for how long, etc. We use the information obtained from these analytics tools to monitor the performance and improve our Website and Services. We do not use third-party analytics tools to track or to collect any personally identifiable information of our Users and we will not associate any information gathered from the statistical reports with any individual User.

14. Do Not Track signals

Some browsers incorporate a Do Not Track feature that signals to websites you visit that you do not want to have your online activity tracked. Tracking is not the same as using or collecting information in connection with a website. For these purposes, tracking refers to collecting personally identifiable information from users who use or visit a website or online service as they move across different websites over time. How browsers communicate the Do Not Track signal is not yet uniform. As a result, the Website and Services are not yet set up to interpret or respond to Do Not Track signals communicated by your browser. Even so, as described in more detail throughout this Policy, we limit our use and collection of your Personal Information. For a description of Do Not Track protocols for

browsers and mobile devices or to learn more about the choices available to you, visit internetcookies.com

15. Advertisements

We may permit certain third-party companies to help us tailor advertising that we think may be of interest to Users and to collect and use other data about User activities on the Website. These companies may deliver ads that might place cookies and otherwise track User behavior.

If you would like more information about your choices to opt-in or opt-out of this data collection, please visit Digital Advertising Alliance website and Network Advertising Initiative website to learn more information about interest-based advertising.

16. Email marketing

We offer electronic newsletters to which you may voluntarily subscribe at any time. We are committed to keeping your e-mail address confidential and will not disclose your email address to any third parties except as allowed in the information use and processing section or for the purposes of utilizing a third-party provider to send such emails. We will maintain the information sent via e-mail in accordance with applicable laws and regulations.

In compliance with the CAN-SPAM Act, all e-mails sent from us will clearly state who the e-mail is from and provide clear information on how to contact the sender. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails or by contacting us. However, you will continue to receive essential transactional emails.

17. Links to other resources

The Website and Services contain links to other resources that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other resources or third parties. We encourage you to be aware when you leave the Website and Services and to read the privacy statements of each and every resource that may collect Personal Information.

18. Information security

We secure information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. We maintain reasonable administrative,

technical, and physical safeguards in an effort to protect against unauthorized access, use, modification, and disclosure of Personal Information in our control and custody. However, no data transmission over the Internet can be guaranteed.

Therefore, while we strive to protect your Personal Information, you acknowledge that (a) there are security and privacy limitations of the Internet which are beyond our control; (b) the security, integrity, and privacy of any and all information and data exchanged between you and the Website and Services cannot be guaranteed; and (c) any such information and data may be viewed or tampered with in transit by a third party, despite best efforts.

As the security of Personal Information depends in part on the security of the device you use to communicate with us and the security you use to protect your credentials, please take appropriate measures to protect this information.

19. Data breach

In the event we become aware that the security of the Website and Services has been compromised or Users' Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, we will make reasonable efforts to notify affected individuals if we believe that there is a reasonable risk of harm to the User as a result of the breach or if notice is otherwise required by law. When we do, we will post a notice on the Website.

20. Changes and amendments

We reserve the right to modify this Policy or its terms related to the Website and Services at any time at our discretion. When we do, we will revise the updated date at the bottom of this page. We may also provide notice to you in other ways at our discretion, such as through the contact information you have provided.

An updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. Your continued use of the Website and Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your Personal Information in a manner materially different than what was stated at the time your Personal Information was collected.

21. Acceptance of this policy

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using the Website and Services and submitting your information you agree to be bound by this

Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to access or use the Website and Services.

22. Contact information

If you have any questions regarding the information we may hold about you or if you wish to exercise your rights, or if you have any other questions, concerns, or complaints regarding this Policy, we encourage you to contact us by using email address: privacy@havila.no

If you prefer to make a phone call: +47 700 84 500

If you like to delete your settings use the form published at this site:

<https://eu1.hs-data-privacy.com/request/2KLUthA2bdj2QVeUIEf43Q>

We will attempt to resolve complaints and disputes and make every reasonable effort to honor your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by applicable data protection laws.

You may also have the right to complain about our use of your information by contacting Norwegian Authorities:

Datatilsynet
Tollbugata 3
0152 Oslo
Tel +47 22 39 69 00
email: postkasse@datatilsynet.no

This policy have been revised and published on November 20th 2024, and are valid from publication.