

PRIVACY & PERSONAL DATA PROTECTION POLICY

Last updated: May 2018

The website <https://goldenstarferries.gr>, hereinafter referred to as "Website", managed by "GOLDEN STAR FERRIES MARITIME COMPANY" (hereinafter referred to as "GOLDEN STAR FERRIES"), is the controller of the *personal data* we collect from you when you visit our Website and use our web services, i.e. any information which identifies you or can identify you as a person directly or indirectly.

GOLDEN STAR FERRIES treats your privacy and personal data very seriously and has taken all necessary steps to safeguard the security and confidentiality of information regarding visitors/users of its Website.

Please read carefully our Website's Privacy and Personal Data Protection Policy to see what personal information is collected when visiting the Website and using its web services, what information is posted on it, how it is used, as well as what your rights are.

This Policy provides information to data subjects in accordance with Articles 13-14 of the General Data Protection Regulation (EU) 679/2016. If you have any queries regarding this Policy and generally with how GOLDEN STAR FERRIES collects and processes your personal data, please contact GOLDEN STAR FERRIES Data Protection Officer at: dpo@goldenstarferries.gr

THE INFORMATION OUR WEBSITE COLLECTS

1. Information collected automatically during your visit and interaction with our Website

Browsing our Website does not require visitors to provide/enter any personal data. However, just by visiting and browsing the Website, certain information can be automatically collected that can identify you directly or indirectly, such as:

- the Internet Protocol (IP) Address of your computer,
- the web browser type and operating system,
- the web pages you visited immediately before and after your visit to the website,
- the connection speed and any information regarding the software programs installed on the computer,
- basic connection information with the server and
- information collected through HTML cookies, Flash cookies, web beacons and other similar technologies (see below under "Cookies" section).

2. Information you provide directly to us:

2.1. Online ticket reservation

If Website visitors wish to make an online ticket reservation regarding one or more of our ferry routes, they are required to fill in and submit the required information from which the Website collects and processes, upon consent, the following personal data:

PASSENGER DETAILS

- Name and surname
- Passenger age (adults/minors)
- Nationality
- Departure/return date
- Ferry route for which the reservation is made
- Golden Miles Loyalty Card information

CONTACT DETAILS

- Name and surname
- Address (street, postal code, city, country)
- Email address
- Mobile phone number

TICKET DELIVERY DETAILS (if different from contact details), i.e.:

- Name and surname
- Address (street, postal code, city, country)

Online ticket payment is processed via Eurobank's secure E-Commerce environment, where users are required to enter their card details (type, number, expiration date, security code). Before the reservation is completed, users are required to accept the Reservation Terms and the reservation's personal data protection policy, and indicate whether they wish to receive the reservation information via sms.

2.2. Newsletters

In addition, users can subscribe on our Website in order to receive newsletters by adding their email address to the GOLDEN STAR FERRIES contact list.

2.3. Web Check-in

If users wish to check in using our Website, they are required to enter the reservation number and their surname or telephone number.

2.4. Loyalty Card

If users wish to subscribe to the Golden Miles card (Loyalty Card) of GOLDEN STAR FERRIES, they are required to complete the New Membership Registration Form on our Website, which includes the following information:

- Gender
- Date of birth
- Name and surname
- Home address
- Postal code
- Country
- Landline telephone number (optional)
- Business telephone & fax number (optional)
- ID documentation type and number (ID card or passport)
- Email address

2.5. Curricula Vitae

Users who are interested in working for GOLDEN STAR FERRIES are required to fill in the online recruitment application, attach their CV and submit the following data to the company:

- Name and surname
- Email address
- Telephone number
- Note

WE USE THE INFORMATION WE COLLECT FOR THE FOLLOWING PURPOSES

1. To provide our services

By making an online ticket reservation on our website, we use the information you provide to us to fulfill our contractual obligations (issue and delivery of ferry tickets), so that you can travel to your destination and use the web check-in as an option.

2. To customize our services and offers towards you

By issuing the GOLDEN STAR FERRIES Loyalty Card (Golden Miles card), we draw your passenger profile to allow you to enjoy the privileges of Golden Miles card membership (offers and discounts, applicable

on collected miles). In any case, GOLDEN STAR FERRIES allows you to object this communication, by submitting a request.

2. To contact you:

Upon your consent, we use your contact details (email address) to send you GOLDEN STAR FERRIES newsletters with our news and promotions.

3. To evaluate your Curriculum Vitae

Upon your consent, we collect information about your professional experience if you are interested in employment opportunities at GOLDEN STAR FERRIES and have submitted your CV electronically.

4. To conduct statistical analyses:

To learn more about how our Website is used by our visitors, we keep the collected data in an aggregated form to analyze them. We may use this information, for example, to track and analyze how the Website is used, to enhance its functionality and to improve its content and design to meet our visitors' needs.

MINORS

When collecting information directly from you, we take reasonable care in order to establish which collected personal information concerns minors. In any case, if we find out that we have collected any personal information from a minor under the **age of 16** without verifiable parental consent, in accordance with the provisions of Article 8 of the General Data Protection Regulation (EU) 679/2016), we will erase this information from our database as soon as possible. If you think we may have collected information from a minor under the age of 16, please contact GOLDEN STAR FERRIES Data Protection Officer at: [**dpo@goldenstarferries.gr**](mailto:dpo@goldenstarferries.gr)

USE AND EXCHANGE OF INFORMATION

GOLDEN STAR FERRIES respects your right to protect your privacy and your personal data, and therefore uses these data for the purposes described above. For this reason, it shall not disclose, transfer or make your information accessible to third parties unless this is required to fulfill the processing purposes described in this Policy. In addition, we shall not transfer this information outside the European Union.

We may make your personal information available to other companies, applications, or persons under the following circumstances:

- We may disclose aggregated information or information that does not directly identify you to third parties, in order to further develop the content and services of our Website. Please note that we shall not disclose in any way your contact details to third parties for this purpose.
- We may employ now or in the future third parties to provide services related to our Website, such as database management, maintenance services, analytics, marketing, data processing, and email and text message distribution. These third parties will have access to your personal data only for the purposes of performing the above tasks on our behalf under explicit contractual obligations to protect your privacy and personal data.
- We may disclose your personal data in the event that GOLDEN STAR FERRIES is acquired by or merged with another company, or in the event that a similar business transaction takes place. However, in this case, our Website will notify you by placing a highly visible announcement on its pages or by sending a notice to the email address you have provided to us, before your personal data are transferred or generally placed under a different personal data protection policy.
- We may disclose your personal information in order to investigate, prevent or take action regarding illegal activities, if there are suspicions of unlawful behavior or criminal acts against the rights and legitimate interests of any natural or legal persons, in case our Website's terms of use are violated or if required by law, as well as in other cases where we believe in good faith that the disclosure of information is necessary.
- We may disclose your personal information to respond to subpoenas, search warrants, judicial proceedings, court orders, legal processes, or other law enforcement measures issued by any competent port or other authority, including the Personal Data Protection Authority and the Data Protection Supervisory Authorities of other Member States of the European Union, as well as to safeguard and defend our legal rights or rebut claims raised against us.

Please note that third parties may independently collect data about you, including your IP address and information on the websites you visit and the links you click, cookies, clicks on links or other media during your visit. For more information, please see the "Cookies" section below.

HOW LONG THE INFORMATION IS RETAINED

GOLDEN STAR FERRIES shall retain the personal data that it collects through its Website for the period of time which is strictly necessary for the fulfillment of the above processing purposes. If you withdraw your consent concerning the collection and processing of your personal data, we will erase your data from our electronic and physical files, unless their retention is essential to comply with our legal obligations or to exercise, establish or defend our rights or legitimate interests in court.

CONSENT

By using this Website and without prejudice to the provisions of the law on consent regarding sending electronic messages for direct marketing purposes, you expressly consent to all the above cases of processing and disclosure of your personal data. You may withdraw your consent at any time. If you wish to withdraw your consent, please notify us by submitting your request to the GOLDEN STAR FERRIES Data protection Officer at: dpo@goldenstarferries.gr

The withdrawal of your consent will not invalidate the legitimacy of your personal data processed until then.

Regarding the information automatically collected when browsing our Website, you are kindly advised to abstain from visiting this Website if you do not wish this information to be collected and processed.

INFORMATION SECURITY

The security of your personal data is our ultimate commitment. To achieve this, we apply modern and technical and organizational measures that are appropriate for the purposes of the processing whose responsiveness and adequacy we monitor regularly.

The SSL (Secure Sockets Layer) protocol used by our Website is currently the global Internet standard for the certification of websites to web users and the encryption of data between Internet users and web servers. An encrypted SSL communication requires all information sent between a client and a server to be encrypted by the sending software and decrypted by the receiving software, thereby protecting personal information when transferred. In addition, any information sent under the SSL protocol is protected by a mechanism that automatically verifies whether the data have been changed during transfer.

YOUR RIGHTS

You can exercise the following rights, as applicable:

- **the right of access**, to find out what personal data we process, for what purpose and who the data recipients are,
- **the right to rectification** of inaccurate data and completion of incomplete data,
- **the right to erasure (right to be forgotten)**, under which your personal data are erased from our records, if they are no longer necessary for the purposes they were processed or it is not necessary to retain your data in order to comply with our legal obligations or to defend our legitimate interests in court,
- **the right to restriction of processing** in case the accuracy of your data is contested,
- **the right to data portability** to receive your data in a structured and commonly used format,

- **the right to object** to the processing of your data to be used for the direct marketing of our services, including profiling.

To exercise your rights, please send a corresponding request to the GOLDEN STAR FERRIES Data Protection Officer at: dpo@goldenstarferries.gr

GOLDEN STAR FERRIES will make every effort to respond to any such request within thirty days of its receipt. However, if, due to the complexity of your request or due to the volume of information, we cannot satisfy your request within thirty days, GOLDEN STAR FERRIES shall inform you in writing within the above deadline about the reasons for the delay and shall make every possible effort to satisfy your request as soon as possible and in any case within the next two months.

GOLDEN STAR FERRIES reserves the right not to satisfy your request if it is manifestly unfounded or excessive, informing you of the reasons for doing so.

In any case, you have the right to file a complaint with the Personal Data Protection Authority (www.dpa.gr).

Cookies

What are cookies and what are they used for?

They are bits of information stored on computers to identify the web browser used while browsing websites. Device IDs are compiled from the available system components, which may include IP addresses, user agent information (browser version, operating system type and version), or device-generated identifiers, such as Apple advertising IDs, Apple identifiers for vendors, Google Android IDs or Google Play Store advertising IDs. Cookies and similar technologies may be used to memorize items such as user IDs and preferences.

Using cookies allows our Website to memorize information concerning your visit by collecting useful information about your search preferences. Thus, your search experience will be improved next time you visit us.

In addition, cookies help us monitor our Website's performance and traffic, thereby improving its design and content, according to our visitors' preferences.

Which cookies are we using?

Some or all cookies described below may be stored in the web browser. You can view and manage cookies in the web browser (however, mobile device browsers may not offer this option). Our Website may use the following cookies

Time cookies

They include the current date. This information is necessary for website services related to dates. These cookies expire after a day. Upon their expiration, the cookies are automatically erased.

These cookies do not serve to re-identify visitors and they are not used to assess the users' behavior.

PHPSESSID Cookies

These cookies are stored on your computer when using the online reservation option.

They help identify users clearly and protect your personal data from unauthorized third party access. They do not store personal data, nor are they used for profiling purposes.

These cookies are automatically deleted when you close your web browser or when the browser session expires.

1. Absolutely necessary cookies:

The technically necessary cookies are essential for the normal operation of our Website, by allowing you to browse and use its functions. These cookies do not reveal your personal identity.

Without these cookies, we cannot guarantee the effective operation of our Website.

In addition, these cookies allow our Website to remember your options concerning, for example, font size to provide enhanced and personalized features.

2. Performance Cookies

Google Analytics:

These cookies collect information about how you use our Website, for example, which pages you visit more often. These cookies collect information in an aggregated, anonymous form that does not identify any visitors. They are solely used to improve a website's performance.

Search Console

These cookies collect information in an aggregated, anonymous form concerning normal operation and any occurrence of errors on our Website, including cases e.g. when a user searches for an older version of the website or when any files have been violated.

You do not wish to use cookies?

You can enable, disable or even effectively erase cookies by changing the settings in your browser.

For example, in Chrome, you can click the Chrome menu and then select Settings/ Privacy/ Content Settings to customize your cookie settings.

If you choose to disable cookies, some parts of the website may not work effectively.

More information on the types of cookies is available at <http://www.allaboutcookies.org>. If you wish to learn how to manage or remove cookies, go to www.AboutCookies.org.

CONTACT US

If you have any queries regarding this Policy or, more generally, regarding the activities of GOLDEN STAR FERRIES, you may contact the GOLDEN STAR FERRIES Data Protection Officer at: dpo@goldenstarferries.gr

CHANGES IN THIS POLICY

GOLDEN STAR FERRIES reserves the right to modify this Policy, always in accordance with the applicable privacy and personal data protection legislation. Our Website visitors should read this Privacy and Personal Data Protection Policy regularly in order to keep updated about any changes that take place, and in turn, GOLDEN STAR FERRIES is committed to inform its visitors and users about any changes, using every appropriate means, in compliance with the conditions laid down by the General Data Protection Regulation (EU) 679/2016.