



## PRIVACY POLICY

The privacy and security of your personal information is extremely important to CharterEye. This privacy policy explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information. By using our website, social media pages or providing your information you consent to our collection and use of the information you provide in the way (s) set out in this policy. We may make changes to this policy from time to time. If we do so, we will post the changes on this page and they will apply from the time we post them.

### WHO ARE WE?

From superyacht charter to yachting holidays & exotic cruises, CharterEye is a leading online Search and Comparison Portal providing extensive details of many of the World's best yacht charters, holidays and cruises, as well as Yachts for Sale, offered by many of the top companies in this industry. Together with a FREE weekly Newsfeed and a bi-annual CharterEye Magazine published for the Summer & Winter seasons plus Special Offers offered by its many clients, CharterEye is a highly effective and very user-friendly way to find, compare and book the vacation, yacht charter or cruise of your dreams!

- \* Search and Compare Yacht Charters, Holidays and Cruises - from some of the best World's best yachting and cruise companies.
- \* Shortlist & Enquire about your Preferred Choices - direct to the companies concerned.
- \* Receive Special Offers and the Latest News - from yacht charter and cruise companies worldwide.
- \* Receive a FREE Magazine (Summer & Winter Seasons) - dedicated to the World's best yacht charters, holidays and cruises
- \* Use the CharterEye portal totally FREE OF CHARGE!

### OUR COMMITMENT TO YOUR PRIVACY

We are committed to keeping the personal details of our supporters safe. This policy explains how and why we use your personal data, to ensure that you remain informed and in control of your information. We use three key definitions to describe people mentioned in this policy. These are definitions used by the Information Commissioner's Office. the independent body set up to uphold information rights.

- \* 'Data subject': this is you, one of our readers and portal users. As the data subject, we respect your right to control your data.
- \* 'Data controller': this is us, CharterEye. With your permission, we determine why and how your personal data is used (as outlined in this policy).
- \* 'Data processor': this is a person, or organisation, which processes your data on our behalf, with your permission. For example, CAF Donate who process donations via our website or the logistics company who organise our London to Monaco cycle and collects information such as medical history or date of birth.

When we work with other organisations or individuals that act as Data Processors, we will ensure that such arrangements comply with data protection legislation. The third parties we work with at no point 'own' your data, so you will never hear from them independently, and they will always delete your data from their systems when they have completed the task in hand. We will never sell your personal data.

Should you wish to find out more about the information we hold about you, or about our privacy policy, please email us at: [enquire@chartereye.com](mailto:enquire@chartereye.com)

## WHY DO WE COLLECT YOUR PERSONAL DATA?

We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so, this will usually be for information about our work, to invite you to attend appropriate events, to update you with news and offers made by the companies presented on CharterEye, plus feedback and other legitimate interests. The ICO refers to this as a 'lawful basis'.

Your personal data also helps us to get to know you better and to develop a 'profile' of you on our secure supporter database. This 'profile' enables us to send you the information listed above in a timely and relevant way, to suit you.

CharterEye will only contact you for the following reasons (though these may be updated from time to time as our operations change):

**a) To keep you updated with all the latest CharterEye News and Special Offers and Events we are attending. We will do this in the following ways:**

- \* By emailed 'Newsfeeds' (sent to subscribers only)
- \* By emailed 'Magazine Notifications' (sent to subscribers only)

You can subscribe to both of these at: <https://chartereye.com/magazine/>

**b) To buy or sell goods or services:**

We collect personal data to comply with contractual responsibilities when we buy and sell goods and services from others. CharterEye does not currently undertake retail activity to the public, but does engage in some partnership arrangements. The ICO define the lawful basis for processing personal data for these purposes as 'contractual'.

**c) To meet our legal obligations**

CharterEye collects personal data in order to comply with legal obligations to official bodies in the countries in which it operates. The ICO define the lawful basis for processing personal data for these purposes as 'legal obligation'.

**d) To enable effective functioning of our organisation:**

We collect personal data to enable CharterEye to operate effectively in a variety of ways such as:

- \* running engagement activities such as conferences and events
- \* evaluating events, campaigns and website activity
- \* office management
- \* research and statistical analysis
- \* responding to feedback, complaints and compliments to staff
- \* complying with regulators and official bodies
- \* safeguarding, health and safety, security

The ICO define the lawful basis for processing personal data for these purposes as 'legitimate interest'.

## WHAT KIND OF PERSONAL DATA DO WE COLLECT? HOW DO WE COLLECT IT?

**a) Basic information**

We will usually collect only basic information about you, ie: your name and email address.

Most of the time, we collect this data from you directly. Sometimes this is in person; other times, it is by email, over the telephone or in writing. Occasionally we obtain information from an existing contact who deems that you have a legitimate interest in CharterEye.

Sometimes we may collect other information about you. When we do so, will be very clear as to why we are collecting such information, and we will only do so with your specific consent and permission.

If you do not wish for your data to be collected in any of these ways, or have questions about them, please contact us at: [enquire@chartereye.com](mailto:enquire@chartereye.com)

#### **b) Children and young people**

In line with data protection law, we will not collect, store or process your personal details if you are under 13 years of age; unless we have the express permission from your parent or guardian to do so.

## **HOW DO WE STORE YOUR DATA?**

#### **a) Security**

All of the personal data that is processed by CharterEye is done so by our staff in-house. However, for the purposes of IT hosting and maintenance your information may be situated outside of the European Economic Area (EEA). Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). We have documents relating to data protection procedures which personnel are required to follow when handling personal data.

#### **b) Payment security**

When processing payments via our website, CharterEye complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details. We cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

#### **c) Data retention policy**

We will only use and store information for as long as it is required for the purposes it was collected for.

## **YOUR RIGHTS**

We respect your right to control your data. Your rights include:

#### **a) The right to be informed**

This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.

#### **b) The right of access**

If you wish to obtain a record of the personal data we hold about you, email: [enquire@chartereye.com](mailto:enquire@chartereye.com)

#### **c) The right to rectification**

If we have captured information about you that is inaccurate or incomplete, we will update it.

#### **d) The right to erase**

You can ask us to remove or randomise your personal details from our records.

#### **e) The right to restrict processing**

You can ask us to stop using your personal data.

#### **f) The right to data portability**

You can ask to obtain your personal data from us for your own purposes.

#### **g) The right to object**

You can ask to be excluded from marketing activity.

#### **h) Rights in relation to automated decision making and profiling**

We respect your right not to be subject to a decision that is based on automated processing.

For more information on your individual rights, please see the Information Commissioner's Office.

## FEEDBACK TO CHARTEREYE

### a) Positive Feedback

We hope you have a positive experience using CharterEye. If so, we would very much like to hear from you, together with any ideas and suggestions on how we can improve our service. Any correspondence on these matters can be treated as confidential if required – but such correspondence is incredibly useful to us to help us develop CharterEye for others to enjoy.

### b) Making a complaint and other feedback

If there are issues with the provision our activities, we want to hear about it, in order to deal with the situation as quickly as possible and put measures in place to stop it happening again. We take complaints very seriously and we treat them as an opportunity to develop our approach. This is why we are always very grateful to hear from people who are willing to take the time to help us improve. Our policy is:

- \* To provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint.
- \* To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint.
- \* To make sure everyone in our organisation knows what to do if a complaint is received.
- \* To make sure all complaints are investigated fairly and in a timely way.
- \* To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- \* To learn from complaints and feedback to help us to improve what we do.

### c) Confidentiality

All complaint information will be handled sensitively, in line with relevant data protection requirements

### d) Responsibility

Overall responsibility for this policy and its implementation lies with the Head of Operations.

If you wish to give feedback: positive, negative or just useful, then email us at: [enquire@chartereye.com](mailto:enquire@chartereye.com)

## LINKS TO THIRD PARTY WEBSITES

Our websites contain links to third party websites that we believe may be of interest to our website visitors. This privacy policy only governs our websites and we are not responsible for the privacy policies that govern third party websites even where we have provided links to them. If you use any link on our website we recommend you read the privacy policy of that website before sharing any personal or financial data.

## SOCIAL MEDIA SITES

We operate a number of social media pages (including Facebook and Instagram). Although this policy covers how we will use any data collected from those pages it does not cover how the providers of social media websites will use your information. Please ensure you read the privacy policy of the social media website before sharing data and make use of the privacy settings and reporting mechanisms to control how your data is used.

## GET IN TOUCH

Should you wish to find out more about the information we hold about you, or about our privacy policy, please email us at: [enquire@chartereye.com](mailto:enquire@chartereye.com)

## COOKIES POLICY

We are committed to protecting you and your family's personal information when you're using our website, and to providing users with a clear understanding of how and why we use cookies. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

They help us to identify which of our pages are the most popular and what type of journey a visitor has through our site.

### a) First party cookies

This site uses cookies in several places – we've listed each of them below with more details about why we use them.

### b) Third party cookies

We use a number of suppliers who may also set cookies on their websites' on its behalf. This site does not control the dissemination of these cookies. You should check the third party websites for more information about these.

Cookie name	Cookie Description
1P_JAR IDE DV NID	Google advertising cookie used for user tracking and ad targeting purposes
CONSENT __ga __gat __gid	Google cookie consent setting Google analytics cookies – These are used to collect information about how visitors use the Sites. The cookies collect information anonymously, including the number of visitors to the sites, where visitors have come to the sites from and the pages they have visited. We use this information to compile reports and to help us improve the sites.
Campaign Monitor ViewedIDs Resolution	Campaign monitor cookie for logging email newsletter signups Used to log screen resolution

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org)

To opt out of being tracked by Google Analytics across all websites visit:

<http://tools.google.com/dlpage/gaoptout>

