

1 Preamble

The protection of your personal data is very important to SC Cruise & Holiday SRL (hereinafter referred to as "Croaziere.co" or "Agency"), a Romanian legal entity based in Oradea, Str. Tudor Vladimirescu, Nr. 41/14, Jud. Bihor, CUI RO33869892, registered at the Bihor Trade Register under No. J5/1856/2014.

We want you to be properly informed about the manner and purposes in which SC Cruise & Holiday SRL processes your personal data, **in order to express, in full knowledge of the facts, a validly expressed consent for the proper execution of the contract between the parties.**

The privacy policy describes how we collect and manage any information collected from the users of our services. By accessing or using the Services, we refer to browsing the site, accessing the chat on the site, accessing the Facebook chat of the official page Croaziere.co or any communication transmitted through applications such as **Whatsapp, iMessage, Viber, Telegram, Signal or similar text messages** on the numbers owned by Cruise & Holiday SRL (+40 736 679 040 or +40 0735 540 603), you expressly agree to the collection, use, storage, processing and disclosure of your information in accordance with our Privacy Policy.

For the purposes of this policy, unless otherwise defined, the used capitalized terms shall have the same meaning as defined in the Terms and Conditions.

Our company's Privacy Policy contains information about the collection by our staff of personal data and other information, products and services offered or performed by SC Cruise & Holiday SRL and the way of processing them. We respect the privacy rights of our Clients and take reasonable steps to ensure that Visitors and Clients are familiar with how they have provided information accessible through the website www.croaziere.co or through communication channels with the Agency. Due to the implementation of global security regulations, personal data provided by the Services, Sites and Applications comply with high security standards. Acceptance of the Terms and Conditions for the use of any of the Agency's services or the decision to use or purchase any service offered by the Agency implies acceptance of its Privacy Policy.

2 Terms and Definitions

In accordance with the (EU) Regulation 2016/679 of the European Parliament and of the Council from April 27th, 2016 regarding the protection of individuals in relation to the processing of personal data and on the free circulation of such data:

"Personal data" refers to any information relating to an identified or identifiable natural person ('the person concerned'); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by referring to an identifying element, such as a name, an identification number, location data, an online identifier, or one or several specific elements, specific to his physical, physiological, genetic, mental, economic, cultural or social identity.

"Processing" means any operation or set of operations performed on personal data or personal data sets, with or without the use of automated means, such as the collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, disclosure by transmission, dissemination or other manners of making it available, alignment or combination, restriction, deletion or destruction.

"Operator" means the natural or legal person, public authority, agency or other entity which, alone or in association with others, determines the purposes and means of processing of personal data; where the purposes and means of processing are determined by Union or national law, the operator or the specific criteria for its designation may be laid down in Union or national law.

"The person authorized by the operator" refers to the natural or legal person, public authority, agency or other body which processes personal data on behalf of the operator;

"Recipient" means the natural or legal person, public authority, agency or other entity to whom personal data is disclosed, regardless if it is a third party or not. However, public authorities, to which personal data may be disclosed in the course of a particular investigation in accordance with Union or national law, shall not be considered as recipients; the processing of such data by the public authorities concerned shall comply with the applicable data protection rules, in accordance with the purposes of the processing;

"Third party" means a natural or legal person, public authority, agency or other entity other than the person concerned, the operator, the person authorized by the operator and the persons under the direct authority of the operator or the persons authorized by him, which are authorized to process personal data;

"Consent" of the person concerned refers to any manifestation of free will, in a specific, informed and unambiguous manner of the person in question, by which he or she accepts, by an unequivocal statement or action, that the personal data concerning him or her are to be processed.

"Services" refers to the intermediation of the reservation of tourist services, accessing or using the site www.croaziere.co, accessing the chat on the site, accessing the Facebook chat of the official page Croaziere.co or any communication transmitted through applications such as Whatsapp, iMessage, Viber, text message on the numbers held by the Agency (+40 736 679 040 or +40 733 463 884)

"Agency" is represented by S.C. Cruise & Holiday SRL (hereinafter referred to as "Croaziere.co" or "Agency"), the identification data of which can be found in the preamble.

"Cruise companies" are represented by the partner cruise companies which exist in the Agency's portfolio, with which the Agency has collaboration and/or representation contracts.

"Visitors" are those who access, navigate and use the services of the Agency.

"Clients" are persons who request an offer or purchase a package through the communication channels used by the Agency.

"Site" is represented by the Agency's website, www.croaziere.co

3 Scope of Application

This Privacy Policy applies to all information collected by the Agency, from which a person can be identified (Personal Information / Personal Data). This Privacy Policy also applies to all personal data received by the EEA Agency (European Economic Area) and Switzerland.

Note

The Agency is responsible for the processing of personal data which it receives in accordance with GDPR - European Regulation 679/2016 on the processing of personal data and subsequently transfers to a third-party service provider acting as a service provider on its behalf. We respect the principles of Personal Data Protection for all future transfers of personal data from the EU and Switzerland, including the provisions on subsequent transfer. With regard to personal data received or transferred in accordance with the Private Security Framework, we are subject to the regulatory powers of the GDPR - European Regulation 679/2016 on the processing of personal data. In certain situations, we may be required to disclose personal data in response to legal requests from public authorities, including to comply with national security or law enforcement requirements. Please note that we may disclose personal data in response to subpoenas, court orders or legal proceedings or to establish or exercise our legal rights or to defend ourselves against legal claims. We may also disclose personal information if necessary, to prevent, investigate or take action in connection with illegal activities, or if the law requires otherwise. To learn more about the Privacy Protection Framework, visit the GDPR website - European Regulation 679/2016 regarding the processing of personal data.

4 Questions and Concerns

If you have any questions or concerns or would like to access, update, modify, correct or delete any of your personal information that we store and process, please contact us at contact@croaziere.co or by mail at: Croaziere.co, Attn.: Privacy Officer, Oradea, Str. Tudor Vladimirescu, Nr. 41/14, 410203, Jud. Bihor.

5 What Information Do We Collect

A. The purpose of data collection

The purpose of the Agency's collection and processing of personal data and other information is:

to provide, maintain and facilitate the services, as well as to ensure the safe and guaranteed performance of the services, to update and improve the functionality of the Services.

to process personal data in order to fulfill legal and contractual obligations and to comply with the provisions of the contracts concluded with you, our customers.

to send personalized offers according to the personal data provided through the Form for the Request for an Offer, the Contact Form, the Chat Form available on the website www.croaziere.co, the Chat available on the official Facebook page or transmitted via Whatsapp, iMessage, Viber, as text message, on the numbers held by the Agency (+40 736 679 040 or +40 0735 540 603 +40733 463 884).

to ensure (establish, investigate or defend) the statements of the Client, as well as of the Agency or the Company, which may appear during or after the end of the provision of the Services.

to keep in touch with the Client in order to offer you an updated offer of Services and instructions or advice regarding the Service.

B. Provided Data

Personal data and other customer information collected by the Agency is used to complete bookings and at the same time to ensure that customers have access to the reserved services. While registering on our website (croaziere.co) in connection with our Services, please provide us with information such as: name, surname, e-mail address, number of participants, telephone number. We also collect other information provided by the Customer during the use of our services. Some of the information provided by customers, such as: IP address, browser type, location, type of operating system, etc. can be automatically viewed when a user visits our site. When you contact the Agency, the Client may be asked to provide similar data, accessible to those provided while you register on our site. We may also collect information (including personal data) provided by you and regarding the people accompanying you on the trip. We also store the content of the chats you have with the Agency through the site, Social Media platforms or transmitted via Whatsapp, iMessage, Viber, text message on the numbers owned by the Agency (+40 736 679 040 or +40733 463 884). Please note that you are fully responsible for the lawful collection of such data in accordance with applicable law, as well as the lawful processing of such data by the Agency. Details of liability for the data mentioned above can be found in the Terms and Conditions.

C. Consent for the Processing and Transfer of Personal Data

The customer agrees and warrants that the processing, including the transfer of his personal data, has been and will continue to be carried out in accordance with the relevant provisions of applicable data protection laws (and, where applicable, has been notified to the relevant authorities of the Member State where the company is established or its representative) and does not violate the relevant provisions of that State.

By checking the appropriate box displayed on the subscriber's website - www.croaziere.co and/or the event, where the related text containing the link to this Privacy Policy is displayed, next to the section "I agree with the Privacy Policy", you express, in full knowledge of the facts and in accordance with the provisions of Art. 4 (11) and Art. 6 (1) of EU Regulation No. 679/2016 (GDPR), your express consent and agreement for the processing of personal data, an operation that involves the collection, use, storage, processing and disclosure of your information in order to execute in good faith the tourist intermediation contract.

The customer agrees and expresses his consent for the processing of any necessary personal data (such as, but not limited to name, surname, telephone number, e-mail address, home address, data contained in identification documents - identity card, passport or any other equivalent document issued by the authorities of the European Union) with the purpose of the execution of the service contract, of the reservation. The client also agrees with the processing and transmission of this data to all legal entities that have direct obligations to the undersigned and/or to the client for the proper execution of the contract for the intermediation of tourist services, in order to ensure the reservation and execution of contracts between the parties. I have taken note that the Cruise Ship is not in all situations the territory of the EU and the relations with the Cruise Company are not governed in all situations by EU law, the contract with it being governed by the law of the State of residence of the Company and I agree that my personal data be provided in these conditions to the Company.

D. Profiling of Personal Data

Please note that by using our services, the Client consents to the profiling of his personal data that has been given to the Agency and the Company, for the purpose of proper maintenance and provision of the Service and those specified in a Privacy Policy. The Client agrees that the profiling of his data will serve, in particular, to provide the Client with content that is accurate and compatible with the scope of the Service. The customer acknowledges that he has the right not to be profiled. In this case, the request can be made at any time at contact@croaziere.co. Withdrawal of consent is equivalent to termination of the contract.

E. Transmission or Destruction of Personal Data

At the Client's request, made in writing to the Company, the Agency will ensure and send a complete copy of all personal data of the client to the client, and undertakes to delete and confirm the deletion of personal data of that client processed by the Company and the Agency. The Agency shall comply with any such written request within 30 days, unless this is not possible due to processing purposes or technical problems.

F. The Preservation of Copies

The Agency may keep the personal data of the Client to the extent required by European Union law or the law of an EU Member State and only to the extent and for a period required by these laws and always provided that the Agency ensures the confidentiality of all such personal data of the clients and shall ensure that such personal data is processed only if necessary, for the purpose(s) specified in the relevant legislation requiring their storage and for no other purpose. The Client agrees that, after the termination or expiration of the Contract, his data may be stored in copy, as a backup, for the period necessary to ensure (establish, investigate or defend) the claims of the Client and the Company that may arise from execution Services (time required for claims to be resolved).

G. Data Protection Officer

Daniela Claudia Bogdan, Mun. Oradea, Str. Tudor Vladimirescu, Nr. 41/14, 410203, Jud. Bihor, email: contact@croaziere.co

H. Geo-Location Data

Please note that the Agency may access your geographic data as we collect and process the IP address of the devices you use to access our site. The collection and processing of your geo-location data relates to mobile devices and computers. This type of localization happens whether you are a visitor or a client.

I. Communications on the Site

Occasionally and only based on your agreement, we will send you "push" notifications to inform you of any information regarding the Services. You can opt out of receiving these types of communications by turning off push notifications on your device. We can also send you emails with our offers if you subscribe to our newsletter. If you do not wish to receive such a notification, you have the option to "unsubscribe" from this type of communication at any time. We'll also send you notifications about some important updates to our Services. The purpose of sending these emails or messages is to inform you about the latest improvements, features and other developments.

J. Personal Data of Third Parties

The client may express his consent and express consent for the processing of personal data of third parties, stating that he has the express consent and a power of attorney from those persons to provide their personal data exclusively for the purpose of performing the contract and the provision of services. By third parties we refer to the final beneficiaries of the Services provided by the Agency and/or Company and on whose behalf our Clients purchase services. The information we may collect is your last name, first name, personal identification number (CNP), date of birth, email address and other contact information. We do this to allow you to add people to your booking of Services. We will not use this data for any purpose that is not in accordance with the Privacy Policy. We may also collect other information (for example, profile picture, network, username, user ID, age range, language, country), depending on your product and your privacy settings. There are other cases where we may receive information from third parties.

K. Children's Personal Data

We do not knowingly collect personal information from people under the age of 13. If you notice that the Agency collects and processes personal data of persons under the age of 13, please contact us at the e-mail address contact@croaziere.co. We encourage parents and legal guardians to monitor their children's Internet use and to help enforce this policy by instructing their children to never provide personal information through online sites or services.

L. Use of "Cookies"

The so-called "cookies" are set during the use of the services or products offered by the Agency on its website. This is information sent by the server, stored on a user's computer, in order to automatically identify a specific user when he uses our Services. "Cookies" allow us to quickly confirm your identity, and, thanks to them, the use of our services becomes much easier and more accessible. "Cookies" are used by the Agency only for the purpose of personalizing a particular user.

"Cookies" may be used under the condition that they are accepted by a browser and are not removed from the storage medium. Users who have removed cookies from their storage media or have not accepted them in their browser do not have access to the services offered by the Agency. We do not connect the information stored in cookies with the personal data you send while visiting the site. The use of cookies by a third party is not covered by our Privacy Policy because we have no access to or control over these cookies.

M. Google Analytics

We use Google analysis software to allow us to better understand the functionality of our site on devices. This software can record information such as the frequency of use of the site, the events that occur within the site, aggregate use, performance data and where the site has been used. It is possible to connect the information stored in the analysis software with the personal data you send within the application.

N. Social Media (Functionalities) and the Widget

Our sites include social media features, such as the "Facebook Like" button and widgets, such as the "Share this article" button or interactive mini programs running on our site. These functions may collect your IP address, the page you visit on our site and generate a cookie to allow it to work properly. Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing them.

6 Disclosure of Data

The main purpose of the Agency regarding the collection of personal data and other information is to maintain the Services, to ensure the performance of secure and guaranteed services for its clients, to improve and develop the functionality of these services. Due to the above process we try to exceed the expectations of our customers, we offer a constant development of our services, the use of which becomes much easier and more convenient. To ensure the orderly operation and safety of our service, we work with software from other service providers (described below). We do not sell or rent your personal data to a third party except as mentioned above. We will never disclose, sell or rent or transfer the registration and personal information with any marketing or promotional partner without your prior consent.

The following are exceptions, in respect of which we may share the information you provide to us or we automatically collect it based on your freely expressed agreement by checking the appropriate box, which is tantamount to accepting this privacy policy:

The Agency reserves the right to disclose personal data to any of our parent companies, subsidiaries, affiliates or successors.

The Agency reserves the right to disclose, and the Customer agrees to disclose and transfer his personal data and other information relating to the Customer to the Third-Party Service Provider (including sub-processors), such as Cruise Companies, Processing Companies for credit/debit cards, customer/service support, email, text messaging, push notification providers or others. At your request we can provide you with a list of entities that may have access to your personal data. We ensure that these entities have access only to the minimum part of personal data that is necessary for the proper provision of services. The Agency will take due diligence to ensure that the processing of data provided to any entity is in accordance with our privacy policy and applicable law.

The data on credit cards/payments provided by the Customer is communicated directly by the Customer to professional companies that carry out non-cash transactions, which are authorized for this purpose and only to the extent necessary to make payments. The agency will not have access to credit/debit card data and will not be able to collect such data.

Personal data may be disclosed to entities in which our Agency is merged or to which our assets, site or operations have been transferred. These entities will be able to use your personal information under the terms of this Privacy Policy. We will let you know if any of these events occur by updating this Privacy Policy and, if possible, by other means.

You should also be aware that courts, or government authorities, may have the authority in certain circumstances to allow your personal information to be shared or transferred to third parties (other than third party service providers).

Personal data and other information provided by the Customer will not be disclosed to third parties, unless the obligation to disclose information to third parties results from current provisions of law, such as compliance with a subpoena or similar legal process, when we believe in good faith that the disclosure is necessary to protect our rights, to protect your safety or the safety of others, to investigate fraud or to respond to a government request, or if necessary for the security and protection of its rights by the Agency, including protection against requests from third parties. The information provided by the Client may be used in case of violation of the Terms and Conditions for the use of the Services, the abusive use of the Services, the need to take action against all actions of the Client that are illegal. The Agency will not transfer any information or personal data to third parties for marketing purposes of third parties not related to the Agency's Services. The Agency reserves the right to use the provided personal data for marketing purposes of its Services and for purposes related to the presentation of the updated offer of Services and instructions or advice related to this service in direct contact with the Client. You may cancel such emails / communications at any time by following the unsubscribe instructions at the bottom of each communication (as applicable) or by sending an email request to contact@croaziere.co.

7 Responsibility for Subsequent Transfer

We will not transfer your personal data from the EU and Switzerland to Third Party Service Providers unless we ensure that the Third Party Service Provider is required to provide at least the same level of protection of the privacy of your personal data in accordance with Swiss - US principles (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation). We will only transfer data to our third party service providers (such as consultants, accountants, lawyers and sub-processors) who need information to provide services or perform activities on behalf of the Company and/or the Agency, in accordance with this Privacy Policy. The Agency's

responsibility for the personal data it receives, in accordance with the Privacy Policy and subsequent transfers, is described in the Principles of Privacy Protection.

8 Sub-Processing of Service Providers

If we need to use a Sub-Processor to provide and support the features of our services, we may share your personal information for this purpose.

9 Advertising Partners

We may work with third parties to display advertising on our sites or to manage and distribute our advertising on other sites and to share personal information with them for this purpose. All third parties with whom we share this information must use your personal information in a manner consistent with this Privacy Policy. We and our sub-processors may use cookies and other identification technologies, such as pixels and web beacons, to collect information about your activities on our sites and other sites to provide you with advertisements based on your browsing activities and interests. We will offer an individual opt-out option before sharing data with third parties other than our suppliers, while providing our services or before using them for any purpose other than for which they were originally collected or subsequently authorized. To limit the use and disclosure of personal information, please send a written request by sending an email to contact@croaziere.co.

10 Security

We guarantee that we take reasonable and appropriate technical and operational measures to protect your personal information that we collect and hold, from loss, misuse and access, disclosure to unauthorized alteration and destruction. While protecting your personal data, we take due account of the risk involved in the processing and nature of personal data.

11 Data Integrity and Purpose Limitation

The Agency will only collect and store personal information that is relevant for the purposes for which the information is collected and will not use it in a way that is not compatible with such purposes unless such use has been authorized by the Client. We may contact you from time to time to determine if your personal information is still accurate and current.

12 Accessibility to Stored Personal Data

Each person concerned has the right to access, correct, modify, block or delete his personal data. The Agency must comply with any reasonable commercial request from the Client to correct, modify, block or delete the Client's personal data, in accordance with data protection laws, to the extent that the Agency is legally authorized to do so. If you wish to access, modify or confirm that the Agency has personal data about you or if you wish to correct or delete your personal information if it is inaccurate, please let us know by sending us an email at contact@croaziere.co. We will respond to your request for accessibility within 30 days. To request the removal of personal data from our testimonials or from the customer support forum, please contact us at contact@croaziere.co (or via the support email of the Service you use). In some cases, we may not be able to delete your personal information, in which case we will notify you if we are unable to do so.

13 Data Protection

The Agency shall apply technical security measures to the highest standards to protect the personal data provided against loss, destruction, misuse, unauthorized access or disclosure. The measures and technology used ensure a complete security of the personal data provided by the Client. Personal data is available only to the Client or to a person indicated by him, provided that authorized access has been granted to that person. The security of your personal data is important to us. We follow generally accepted industry standards to protect the personal data sent to us, both during transmission and after we receive it.

On the other hand, no method of electronic transmission of Internet storage is 100% secure. Therefore, we cannot guarantee absolute security. The Agency shall take all necessary measures to update and modernize the data protection system. However, the transmission of data over the Internet does not guarantee 100% security. When you enter information, such as your credit / debit card number, we notify you that it is not the Agency's site but the site of an authorized card payment processor, which encrypts the transmission of information using SSL (secure sockets layer) technology.

14 Changing the Privacy Policy

We may update the Privacy Policy to reflect changes in our disclosure practices. If we make significant changes, we will notify you via email (sent to the email address you specify) or via an ad on the site before the change takes effect. We encourage you to periodically check this page for the latest information about our privacy practices.

15 Data Collection Unit

The company Cruise & Holiday SRL, with the identification data in the preamble, is the entity that collects personal data and other information.

16 Commercial Transactions

The Agency reserves the right to use its privacy policy, the Client's account and data and information provided for the benefit of an entity that has become either a dependent entity, an associate or has arisen as a result of the merger or transformation of the Agency.

We publish customer reviews on our website that may contain personal data. We use comments received on Social Media accounts to display our customers' comments on our site. On this occasion, we inform you that any activity carried out on platforms such as Facebook, Instagram and others, known generically as "Social Media", are considered, according to the Decision of the High Court of Cassation and Justice of Romania no. 4546 of November 27, 2016, as public activities, so they

are not subject to the regulations on personal data protection. In any other similar scenario, we obtain the customer's consent before publishing the review and posting the name along with their review.

Croaziere.co Community Forum

Our sites may provide publicly accessible forums. You should be aware that any information you provide in these areas may be read, collected and used by others who access it.

17 Link to Other Sites

The Croaziere.co site may contain links to other sites that are not owned or controlled by us. Please note that we are not responsible for the privacy practices of these sites. We encourage you to be aware when you leave our site and to read the privacy policies of each website that collects personal data. This Privacy Policy applies only to information collected by the Agency.

18 Terms and Conditions

By using the services offered by the Agency, the visitor and the client are obliged to comply with the rules contained in the Terms and Conditions available on our site.