

# The World

Residences at Sea

## 1. INTRODUCTION

Welcome to the privacy notice of The World Resident Holdings Ltd. and its subsidiaries The World of Residensea II Ltd. and ROW Management, Ltd. (collectively "The World Group").

The World Group respects your privacy and is committed to protecting your Personal Data. This privacy notice will inform you as to how we look after your Personal Data when you visit our mobile application (regardless of where you visit it from) or provide us with your Personal Data. This notice will tell you about your privacy rights and how the law protects you.

## 2. DEFINITIONS

This Privacy Policy uses a number of definitions which are set out below:

**Comply with a legal or regulatory obligation:** processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.

**Legitimate Interest:** the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We endeavor to consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where we conclude that our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by *contacting us at [privacy@aboardtheworld.com](mailto:privacy@aboardtheworld.com)*.

**Performance of Contract:** processing your Personal Data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Personal Data:** any information which identifies an individual or information relating to an individual who can be identified (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data does not include anonymous data or data that has had the identity of an individual permanently removed.

**Processing or Process:** any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organizing, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring to third parties.

**Resident:** a direct or indirect owner of Residency Rights to an apartment onboard the Ship.

**Ship:** *m/v The World*.

**Special Categories of Personal Data:** any data which reveals details about sensitive issues such as an individual's race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health or genetic and biometric data.

## 3. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this privacy notice

This privacy notice aims to give you information on how The World Group collects and processes your Personal Data, including through your use of our mobile application, including any data you may provide through our mobile application when you sign up for an account, make booking requests or arrange visits to and passage on the Ship.

Our mobile application is not intended for children and we do not knowingly collect data relating to children except in relation to visits to and passage on the Ship.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

**Data Controller**

The World Group is the Data Controller for purposes of applicable data protection laws and regulations (collectively referred to as "The World Group", "we", "us" or "our" in this privacy notice).

#### **Your duty to inform us of changes**

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

#### **Third-party links**

Our mobile application may include links to third-party websites, plug-ins and applications which are not maintained or controlled by The World Group. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our mobile application, we encourage you to read the privacy notice of every website you visit.

## **4. THE DATA WE COLLECT ABOUT YOU**

### **Personal data**

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and passport details.
- **Contact Data** includes billing address, delivery address, email address, telephone numbers and country of residence.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and details of the products and services you have purchased from us.
- **Residency Data** includes your residency details, including details of your travel itinerary, where you are embarking and disembarking, any onward travel details if relevant (for example if you need our assistance for a connecting flight, if you have booked transportation or a tour with us), details of experiences or excursions booked through us, meal preferences or requirements, details of any special assistance you might need from us and any other information relevant to enable us to provide you with your residency or other services arranged with us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this mobile application .
- **Profile Data** includes your username and password, reservations made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our mobile application, products and services.
- **Sensitive Personal Data** includes information about:
  - your health, for example if you ask us to provide you with special assistance during your travel to, from or onboard the Ship, or to determine your fitness to travel onboard the Ship or to participate in an activity, or if you specify a meal preference that indicates a medical condition such as coeliac disease); and/or
  - information about your religion (for example if you specify a meal preference that indicates a particular religion such as a kosher or halal meal).

We seek to limit any sensitive Personal Data that we collect and, unless we have other

specific lawful reasons to use this information (such as in an emergency situation), we will ask for your consent to collect it.

### **Aggregated Data**

When you use our mobile application, we may also collect, use, store and share aggregated, anonymized statistical or demographic data (**Aggregated Data**). Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as it cannot directly or indirectly reveal your identity.

Aggregated Data may include the time and length of your visit to our mobile application and the features you have used on our mobile application. We may also record the name of your internet service provider. We use this information only to measure site activity and to develop ideas for improving our services.

For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific mobile application feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

### **If you fail to provide Personal Data**

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

## **5. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You (or an agent acting on your behalf) may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - inform us about medical conditions as a Resident and/or when requesting or using guest access or other accessibility services;
  - enter a promotion or survey;
  - give us feedback;
  - contact our Residential Advisors or other personnel onboard the Ship or employees or representatives of ROW Management, Ltd.;
  - attend any events we host.
- mobile application. As you interact with our mobile application, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies.

We may also receive Technical Data about you if you visit other websites employing our cookies. Please see paragraph 6 below and our Cookie Policy for further details.

## **6. HOW WE USE YOUR PERSONAL DATA**

We will only use your Personal Data in the manners permitted by law. Most commonly, we will rely on the following types of lawful bases to process your Personal Data:

- **Legitimate Interests:** the interests of The World Group in conducting and managing our business in order to give you the highest standard of service and the best and most secure experience. We endeavor to consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests.

We do not use your Personal Data for activities where we conclude that our interests are

overridden by the impact on you (unless we have your express consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Performance of Contract:** processing your Personal Data is necessary for the performance of the contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation:** processing your Personal Data may be necessary for compliance with a legal or regulatory obligation to which we are subject.
- **Consent:** in certain circumstances, we may ask for your express consent to collect, process or transfer your Personal Data, for example in relation to opting in to our newsletter and other direct marketing. You have the right to withdraw your consent at any time simply by contacting us.

### Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include: (a) Provide you access to Important Announcements (b) Provide you access to our Itinerary and port of call information (c) Provide you the ability to research and request to book onboard dining, onboard activities and destination experiences	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) (d) Necessary for our legitimate interests to present you with the right kinds of products and services (e) Necessary for our legitimate interest in improving our customer service
To enable you to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this mobile application (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) (b) Necessary to comply with a legal obligation

To deliver relevant mobile application content and advertisements to you and measure or understand the effectiveness of the advertising we serve to You	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our mobile application, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our mobile application updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To ensure security and protect our business interests	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Profile	Necessary for our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so
To process your visits to or travel with any of our vessels	a) Identity b) Contact c) Financial d) Transaction e) Residency f) Technical g) Profile h) Usage i) Marketing and Communications j) Sensitive Information k) Job application	Necessary for regulatory purposes and to fulfil contractual obligations

### **Cookies**

We may use cookies and other technologies to collect information on our mobile application for a variety of purposes, such as to improve the design and content of our mobile application and to enable us to provide a more personalized experience when you use the application.

### **Change of purpose**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **7. MARKETING**

We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when participating in an event and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

We will get your express opt-in consent before we share your Personal Data with any company outside The World Group for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at [residentialadvisor@aboardtheworld.com](mailto:residentialadvisor@aboardtheworld.com) at any time.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of an agreement in connection with applying for or being a Resident or other product/service experience or other transactions.

## **8. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your Personal Data with the parties set out below for the purposes set out in the table in paragraph 6 above.

### **Internal Third Parties**

All companies within The World Group.

### **External Third Parties**

- Third party suppliers that we work with to provide services to you as a Resident or with respect to travel to, from or onboard the Ship. We may share your Personal Data with third party suppliers that provide us with services in connection the provision of our services to you. This includes for example: airlines, hotels, tour operators, transport companies, excursion providers, airport authorities, insurance companies, car hire companies and ground handling agencies;
- Other third party suppliers that we work with in connection with our business. We may share your Personal Data with third party suppliers that provide us with services in connection with our business and the provision of our services to you. This includes for example: marketing agencies and/or companies that run our marketing campaigns, IT developers, service providers and hosting providers, third parties that manage promotions or competitions that we may run, third party software companies that provide us with applications on a white label basis, advertising providers and networks, ground agents, site analytics providers, medical service providers and credit card screening companies;
- Airports, ports, customs, immigration / border control and/or other government authorities. Some Local ports and customs authorities require "Advance Passenger Information" about you to process the Ship in the ports at which it calls. Advance Passenger Information comprises the basic information contained in your passport that you would be required to present on your arrival. In addition, laws in certain destinations such as the USA and other countries require carriers to provide certain additional advance information about you and your travel arrangements. We will provide this information where we are required to do so.
- Third parties for marketing. We may share your Personal Data with any selected third party that you consent to our sharing your Personal Data with for marketing purposes;
- Courts, advisors and parties to litigation. We may share your Personal Data with other third parties (including legal, accountants or other advisors, regulatory authorities, courts and government agencies) where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be

permitted or required by law. Law enforcement agencies may also require access to Personal Data, including in connection with criminal investigations, or we may be ordered to disclose Personal Data by a court or in connection with legal proceedings; and

- Third parties which are successors of the business. Your information may be disclosed to any successors of our business, in the event of a re-organization, merger or sale, for them to use for the purposes as set out in this Privacy Policy.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We endeavor to require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

## **9. INTERNATIONAL TRANSFERS**

### **Internal Transfers**

We share your Personal Data within The World Group. This will involve transferring your data outside the European Economic Area (**EEA**).

### **External Transfers**

Many of our external third parties are based outside the EEA, so their processing of your Personal Data will involve a transfer of data outside the EEA.

Whenever we transfer your Personal Data out of the EEA, we endeavor to provide a similar degree of protection of your Personal Data by attempting to see that at least one of the following safeguards is implemented:

- We endeavor to transfer your Personal Data only to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission. For further details, see [European Commission: Adequacy of the protection of Personal Data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts or contract provisions which endeavor to give Personal Data the same protection it has in Europe.
- We endeavor to use providers based in the US which are part of the Privacy Shield which requires them to provide similar protection to Personal Data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

## **10. DATA SECURITY**

We have put in place appropriate security measures to protect your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **11. DATA RETENTION**

### **How long will you use my Personal Data?**



We will only retain your Personal Data for as long as we believe it is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see Request erasure at paragraph 12 below for further information.

In some circumstances we may anonymize your Personal Data (so that it can no longer be associated with you and you can no longer be identified by it) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Details of retention periods for different aspects of your Personal Data are available in our retention policy which you can request from us by contacting us.

## 12. YOUR LEGAL RIGHTS

Under certain circumstances, you may have rights under data protection laws in relation to your Personal Data:

### California Privacy Rights

The World Group may disclose your personal information to our affiliates or other third parties for their use in the marketing of their products or services to you unless you tell us not to. In order to opt out of such sharing or for further information, please contact us at [privacy@aboardtheworld.com](mailto:privacy@aboardtheworld.com)

### European Union resident Privacy Rights

If you reside in the European Union, you may be entitled to the following rights in respect to the personal information that we hold:

- **Request access** to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your Personal Data unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your Personal Data which override your rights and freedoms.
- **Request restriction of processing** of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where you believe that our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;

or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the Personal Data to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at

[privacy@aboardtheworld.com](mailto:privacy@aboardtheworld.com).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to address your concerns before you approach the ICO so please contact us at [privacy@aboardtheworld.com](mailto:privacy@aboardtheworld.com) in the first instance.

#### **No fee usually required**

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who does not have the right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **13. CHANGES TO THIS PRIVACY POLICY**

The World Group will amend this Privacy Policy from time to time in accordance with applicable laws and regulations, and the updated version will be posted on this mobile application. We request that you revisit this mobile application from time to time for updates on the Privacy Policy. This version of the Privacy Policy was last updated on INSERT DATE. Historic versions of this Privacy Policy can be obtained by contacting us.

### **14. COMPLAINTS**

If you have any comments, questions or concerns about the contents of this Privacy Policy or the way in which we use your Personal Data, we encourage you to contact us at [privacy@aboardtheworld.com](mailto:privacy@aboardtheworld.com) to see if we can help resolve the issue in the first instance.

If you are a European Union resident and wish to make a formal complaint or have concerns regarding the ways in which we use your information, you can register your concerns on the ICO site [www.ico.org.uk](http://www.ico.org.uk). We would, however, appreciate the chance to address your concerns before you approach the ICO so please contact us at [privacy@aboardtheworld.com](mailto:privacy@aboardtheworld.com) in the first instance.