

## Privacy policy

DRM Maritime Services takes very seriously the protection of third parties personal data in its possession and is committed to protect the privacy of said third parties included, but not limited to, its customers, when carrying out its business, and pays particular attention to the security and confidentiality of its customers' personal data.

DRM Maritime Services (hereinafter "DRM" or the "Company"), in accordance with article 13 of the GDPR 679/2016, as Data Controller of the personal data collected on this website provides you with the following information.

### WHAT PERSONAL DATA MAY BE COLLECTED

The following categories of personal data – jointly defined Personal data - relating to you may be collected:

- **Contact data** – information on your full name, mobile number, email address, yacht's name.
- **Other personal data** – information you provide us by filling out our "Comments" box in the "Contact" section form.
- **Interests** – information you provide us regarding your general interests, behavior, habits and choice of purchases;
- **Website usage** – information on how you use our website, how you open or forward our communications, including information acquired via cookies

### HOW WE COLLECT YOUR PERSONAL DATA

DRM collects and processes your Personal data in the following circumstances:

- whether you contact us to request DRM's services or information via our form in the "Contact" section; register on our website / download our App to use its functionalities;
- whether you sign up to our "Subscribe to our Newsletter" section in order to receive newsletters and communications about events sponsored by DRM;

In the event that you provide Personal data on behalf of someone else, you must first ensure they have read this Privacy Policy.

Please help us keeping your Personal data up-to-date by informing us of any changes.

### HOW CAN YOUR PERSONAL DATA BE USED?

Processing of Personal data can be justified by any of the hereunder legal bases considered by existing data protection regulations, as described below.

#### **a) Reply to your enquiries and/or service requests submitted via our "Contact" section form on our website**

DRM may process your Contact data and other personal data in order to provide you with the requested services and to reply to your enquiries submitted via our form in the "Contact" section of our website.

Legal basis for the processing: execution of contractual/precontractual obligations.

Data provision is mandatory in order to enable us to manage your enquiries; without it we are unable to fulfil your requests.

#### **b) Marketing to meet your needs and to provide you with promotional content based on your preferences.**

DRM may process your Contact data for marketing and advertising purposes in order to send you newsletters aimed at informing you about promotional initiatives on products, services and any other business related activities. DRM activities include but are not limited to automated means of contact (paper-based, email and other digital supports) and via traditional contact methods (e.g. phone call with

an employee), as well as market research and statistical surveys, should you give your consent and within the limits of the consent declaration.

DRM may also process your Contact data, Interests and Other personal data, in order to send you commercial information in line with your preferences, based on a specific customer profile, should you give your consent and within the limits of the consent declaration.

Legal bases for the processing: consent, a failure to give consent does not affect the contractual relationship.

**c) Communication to DRM Maritime Services companies, affiliated and DRM's partner companies for marketing purposes.**

DRM may communicate your Contact data to affiliated and DRM's partner companies to which data may be communicated for marketing and advertising purposes, aimed at informing you about initiatives on products, services and further DRM activities organized via automated means of contact (paper-based, email and other digital supports) and via traditional contact methods (e.g. call with an employee). In this event, DRM Maritime Services companies, as well as affiliated and DRM's partner companies process your data as independent data controllers.

Legal bases for the processing: consent, a failure to give consent does not affect the contractual relationship.

Your consent may be revoked at any time by contacting us at [info@drmaritime.com](mailto:info@drmaritime.com)

**d) Compliance with legally-binding requirements to be met in order to fulfil legal obligations, regulations or legal authorities provisions.**

DRM collects your Contact data in order to comply with legal obligations and/or to defense of legal claims

Legal bases for the processing: legal obligations with which the Company must comply.

**HOW WE KEEP YOUR PERSONAL DATA SAFE**

The Company employs a wide range of security measures to improve protection and maintain the security, integrity and accessibility of your Personal data.

All your Personal data is stored on our secure servers (or on secure paper copies) or on those of our suppliers or commercial partners, and can be accessed and used on the basis of our standards and our security policies (or equivalent standards for our suppliers or commercial partners).

**HOW LONG WE STORE YOUR INFORMATION FOR**

The Company stores your Personal data only for the length of time necessary to achieve the purposes for which they were collected or for any other related and lawful purposes. Therefore, if your Personal data is processed for two different purposes, we will keep such data up until the longest purpose is achieved. However, we will cease to process the Personal data collected for the purpose whose retention period has expired.

We limit access to your Personal data to only those individuals who need to use them for the appropriate purposes.

When your personal data is no longer required, or when any legal precondition for keeping them no longer exists, they will be irreversibly anonymized (and they can be stored in this way) or securely destroyed. The retention periods relating to the different purposes described above are indicated as follows:

a) Reply to your enquiries and/or service requests submitted via our "Contact" section form on our website

Your Personal data processed in order to provide you with the requested services and to reply to your enquiries submitted via the form in the "Contact" section, will be keep for the time needed to reply and then for 24 months.

Compliance with contractual obligations: data processed to comply with any contractual obligations may be kept for the duration of the contract and in any case no longer than the subsequent 10 years, in order to verify any outstanding issues including accounting documents (e.g. invoices).

b) For marketing purposes, including proofing marketing: your Personal data processed for marketing purposes may be kept for 24 months as from the date you gave your consent for this purpose (except where you decline to receive further communications); for profiling marketing purposes, data will be kept for 12 months

c) In the event of disputes: should it be necessary for us to defend ourselves or take action or bring claims against you or third parties, we may keep the Personal data we deem reasonably necessary for such purposes, for the length of time it takes to pursue the claim.

#### **WHO WE CAN SHARE YOUR PERSONAL DATA WITH**

Your Personal data may be accessed by duly-authorized employees and by appointed external suppliers, if necessary, as data processors, who support us in providing DRM's services including services required to enable our website to operate.

Should you wish to view our list of data processors and other individuals/entities with whom we disclose your data, please contact us at [info@drmaritime.com](mailto:info@drmaritime.com)

#### **CONTACTS**

The contact details for DRM, in its capacity as Data Controller, are:

DRM Maritime Services Ltd

Registered office: Šuranj 248, 85330 Kotor, Montenegro

Operating office: Dumidran bb, Floor 2nd, Apt 3, 85320 Tivat, Montenegro

Should you have any question regarding our processing of your Personal data, please contact us via email [info@drmaritime.com](mailto:info@drmaritime.com)

#### **YOUR PERSONAL DATA PROTECTION RIGHTS AND YOUR RIGHT TO FILE COMPLAINTS BEFORE THE SUPERVISORY AUTHORITIES**

On certain conditions, you are entitled to request:

- access to your personal data
- a copy of the Personal data you have provided to us ('portability')
- the adjustment of data in our possession
- the deletion of any data for which the legal precondition for processing no longer exists
- to deny processing for direct marketing purposes
- to revoke your consent, in cases where the processing is based on consent
- to limit the way in which we process your personal data.

The exercising of the above rights is subject to certain exceptions that are intended to safeguard the public interest (e.g. the prevention or identification of crimes) and our interests (e.g. maintaining professional secrecy). Should you wish to exercise any of the above rights, we will check that you are entitled to do so and will respond within one month.