

Privacy Notice (Updated 1st March 2023)

Privacy Policy

At Classic Sailing LTD, we are committed to protecting and respecting your privacy.

When you provide us with any information, it will be handled and processed by one of our small team at Classic Sailing. If you want to learn more about who we are, check out our <u>team page</u>, or you can <u>contact us for more information</u>.

When you reserve a place on a voyage with one of our vessels, you agree for your information to be passed onto the relevant ship's office for the purposes of your voyage. All sailing partners of Classic Sailing have signed a GDPR data sharing agreement which sets out conditions to abide by when handling your personal information. This agreement is complicit with GDPR and ensures that your information is handled responsibly and lawfully.

This policy explains when and why we ask for your personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We only use the information we collect about you carefully, lawfully and in accordance with the Data Protection Act 1998 and the UK GDPR 2021.

Classic Sailing is always striving to provide the best service for you, we have created our own Customer Charter which sets out our promise to you.

Read the full <u>Classic Sailing Customer Charter Promise here</u>.

Classic Sailing LTD is both your data controller and processor with regards to your personal information.

Who are we?

Classic Sailing Ltd is a Limited UK Company (Reg no. 3256249)

Registered Trademark under Trade Mark number: UK00003204653.

Established in 1996, we have been operating for over 25 years.

The registered and postal address is Classic Sailing Ltd, Mermaids, St Mawes, TR2 5AA.

You can contact us by email at skippers@classic-sailing.com

Or by phone during office hours: +44 (0)1326 531234.

If you want to learn more about our team, check out our team page, or you can contact us for more information.



What information do we collect from you?

We collect personal identifiable information from you such as a name and email address for our e-newsletter.

For Booking

When you apply for a voyage, Classic Sailing and/or our Sailing Partners will need to assess your suitability for the trip before confirming your booking place to ensure your health and safety.

We do not collect personally identifiable information from children under the age of 18 years unless it has been provided by the parent or legal guardian for the purposes of joining one of our vessels for a voyage.

Completing a Voyage Application Form on behalf of another individual.

- If you are completing a booking on behalf of another person (Third party personal and sensitive data) you confirm that they consent to the processing of their personal data and that you have informed them of our identity and the purposes for which the data will be processed.
- We may need some or all of the following information depending on the type of trip you are wishing to book in order to fulfil the contract or service of the product you have booked.
- Personal contact information to communicate with you about your trip by email, phone or by post.
- Date of birth to ensure the trip you have booked is appropriate for your age
- Dietary requirements to help the ship's cook provide for your needs!
- Emergency contact or next of kin contact details —to get in touch with someone ashore in case of an emergency during your voyage.
- Any pertinent medical information and details of any prescribed medication with dosage in case you need
 medical attention during your trip.
- Form of appropriate identification relevant to the trip you have booked. This might include either your passport information, driving license or identity card.
- Depending on your answers to the medical questions on our booking form, Classic Sailing LTD or our Sailing
 Partners may require an additional medical form or letter from your doctor. These medical forms or letters
 will be sent securely and confidentiality will be paramount in how we handle this information.

For Payments:

 Classic Sailing does not hold credit card information. Stripe, a third party PCI compliant payment processor, handles all interactions with credit card information on our behalf. If you pay over the phone, then the card details will be entered directly by one of our team into the Stripe card processor and will never be stored elsewhere by Classic Sailing or Stripe.

Sensitive Data

We are required to collect the relevant sensitive data about you for the purposes of the contract (booking a voyage). If you do not provide us with this information when applying for your voyage, it may mean we will not be able to proceed with your booking, as such information may be required in order for the ship to keep you safe on board.



How we collect your personal information

You can provide us with the personal and sensitive information we need through a variety of different methods including:

- Directly through our website by completing a form, this could be for booking voyages, sending voyage feedback, subscribing to our mailing list, entering a competition, survey or promotion.
- Our website is https secure and the web form is encrypted to prevent anyone apart from Classic Sailing using your information.
- By email or over the phone.
- Through our secure online webchat service.
- You are always welcome to ring us in the office and provide us with the information over the phone, we will then email you within one working day with links to our terms and conditions and privacy policy for you to access. You can call us on 01326 531234.

Why we need it

We require the personal and sometimes sensitive information in order to process your booking and confirm your voyage reservation. Information is also required in order to ensure your safety on board ship.

The Captain or Skipper is responsible for your safety during your trip, accuracy of the information you provide is therefore of high importance.

We do not collect any personal information which we do not need, any of the details which we collect will be relevant for the voyage you are booking.

How we use this information

Marketing Communication.

You will receive marketing communication from us if you have:

- Requested information from us or purchased a voyage, gift voucher, or product from us and ticked the box to consent.
- If you have subscribed to our e-newsletters and ticked the box to consent.
- In both instances, not opted out of receiving that marketing.

Name and Email Address

- When you subscribe to our Classic Sailing LTD email newsletters and given us consent to do so, we will
 collect your name and email address for the purposes of sending you our regular news letters, stories, latest
 offers, competitions and new voyages or destinations. Your email address will never be passed on to
 anyone else and you can unsubscribe at any time.
- We also collect your name and email address when you contact us for information, such as through email or



- our online web chat service, this does not give us permission to subscribe you to our marketing emails. Subscribe links can be found in all of our correspondence to you and in the footer of our website.
- Additionally, your email address and name may be provided to us by someone you know when they ask us
 to send you further information about a voyage we offer, or if someone has purchased a gift voucher on
 your behalf. This does not give us permission to subscribe you to our marketing emails. Subscribe links can
 be found in all our correspondence to you and in the footer of our website.

Personal and Sensitive Information

- The personal information we collect will be processed by one of our trained office staff, located in Cornwall,
- Classic Sailing will use the personal information provided to assess your suitability for the voyage you have applied to sail on.
- Classic Sailing LTD will not share this information with any who is not authorised by you as outlined below.
- By applying for a voyage, you agree to Classic Sailing securely sharing your personal information to the vessel operator or owner for the sole purpose of the contract/your booking.
- Our Sailing Partners have agreed to the same level of privacy protections and are committed to handling your information securely, carefully and lawfully.
- The operator or owner may make contact with you directly for reasons relating directly to your voyage.
- The Captain or Skipper for the voyage you have booked is responsible for your safety during your trip and will safely and securely store your personal information.

Anti-Social Behaviour Policy

- Classic Sailing may use information we hold about you to address complaints of anti-social behaviour.
- Classic Sailing has a legal basis for processing and collecting your information under Article 6 GDPR, the Anti-social Behaviour Crime and Policing Act 2014.
- We operate a zero tolerance policy when it comes to abuse of fellow guests or ships' crew.
- Data processing in line with this policy is necessary to ensure sailors and professional crew are not put into
 jeopardy or suffer any form of abuse by anti-social behaviour due to the close proximity of living, eating and
 sleeping on a traditional sailing vessel.
- We may record, investigate and resolve complaints of anti-social behaviour for safety and well-being purposes as well as for audits.
- We may share, as appropriate, your information with other services, voyages suppliers and agencies in
 order to deal with your case efficiently. These other services may include the Police, the Probation Service
 and the Home Office.

How long we keep it for

We always ensure that your personal and sensitive information is kept secure and only kept for as long as necessary for the purpose for which they are used.

If your details change before a voyage, please email us (and / or our Sailing Partner directly) at skippers@classic-sailing.com.



We will always update your personal information promptly and inform you of the changes made by you in writing.

We will retain your information for as long as needed to provide you with the services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements, but for no longer than this.

We will keep your information for a maximum of 7 years from our last communication with you, except in the case of being subscribed to our marketing emails.

Your rights

You are always entitled to ask for a copy of any information we hold about you. If you wish to have a copy, please email us at skippers@classic-sailing.com.

You can always opt out of emails or request deletion of your information from our system at any time;

- You can opt out of marketing emails by clicking the unsubscribe link included in every email. This will opt
 you out of receiving our e-newsletter, but not relating to a specific product/voyage/service you have
 booked.
- To request deletion of all your personal information from our system, please email sailing.com to be removed. If we will need to retain the information to provide you with a service you have booked or to comply with legal obligations, then we will inform you of the process.

Third Party Websites

We cannot guarantee the security of any third-party website which we link on the Classic Sailing website, it is your responsibility to check their own privacy policies and cookie policy.

Authorised Third Parties

We use third party systems to assist us in processing your personal information, we require these third parties to comply with our privacy policy and any other appropriate confidentiality and security measures. Third party systems such as payment processors, marketing campaign providers, web chat services, database system and web forms on our website are all examples of where we will use third parties to process your information.

Each and every third party processor we utilise has been checked for security and data processing agreements for each one have been signed.

Classic Sailing uses Google (including Tracking Code, Nethunt, GMail, Drive and Docs), Meta Pixel Code, Microsoft Outlook, NetHunt, RafflePress, Zapier, Cognito Forms, MailerLite, ACT, and Tidio Chat Service cookies to monitor the usage of our web pages. We also use Xero Accountancy Software and Stripe for payment processing. We also store data on secure physical servers with backups in secure online Cloud Storage through Sharepoint and Google Drive.



Security

We will notify you if there is ever a breach of your personal information.

Cookies

Cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

Google's Privacy policy relating to these Cookies is available here: http://www.google.com/analytics/learn/privacy.html

To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout

Cookies are used on our web site. You can disable this by not allowing cookies when you view our web pages.

Unhappy with how your data is being collected or used?

If you are unhappy with any aspect of how your information has been collected and/or used, you can make a complaint to the Classic Sailing Directors, by writing to: adam@classic-sailing.co.uk.

You can also report concerns to the national regulator, the Information Commissioner's Office, by visiting ico.org.uk/concerns/handling.

This Policy was updated on the 3rd March 2023

Our Privacy Policy has been developed to conform to the General Data Protection Regulations.

From time to time this Policy will be updated to remain in line with the latest GDPR and privacy regulations. It is your responsibility to read our most up to date version. We will contact anyone whose contact details we hold with any materially significant alterations.

Any questions regarding this policy should be sent by email to skippers@classic-sailing.com,

By writing to Classic Sailing, Mermaids, St Mawes, TR2 5AA,

Alternatively, you can telephone on +44 (0)1326 531234.