

## PRIVACY AND COOKIE POLICY

### I. INFORMATION REGARDING PERSONAL DATA PROCESSING

1. Sailing-Dutchman Sp. O.o. with its registered office in Warsaw, ul. Bawelniana 19a, 01-487 Warsaw, entered in the Register of Entrepreneurs maintained by the District Court for the Capital City of Warsaw, 13th Commercial Division of the National Court Register, under number KRS 0001054707, NIP 5223268765, REGON 526208696 (hereinafter referred to as the Sailing-Dutchman or the Data Controller) is a data controller within the meaning of Regulation 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the "GDPR") of the personal data provided:
  - a. by means of contact and registration forms posted on the sailing-dutchman.com website (hereinafter referred to as the Website);
  - b. in the event of contact with the Sailing-Dutchman, including using electronic means of communication.
2. Legal grounds, purpose and time period of personal data processing by the Sailing-Dutchman:
  - a. Personal data are processed based on a given consent and only for the purpose to which consent has been given. In the event of using application forms on the Website, the data provided is processed:
    - the purpose of reply or providing information in connection with the sending of the contact form – if the contact form is completed and sent,
    - the purpose of registration for the cruise by sending back registration form

The legal basis for the processing of personal data in cases referred to above is Article 6(1)(a) of the GDPR (the data subject has given consent to the processing of his or her personal data for one or more specific purposes).

Personal data will be processed until consent to the processing is withdrawn or the purpose for which it was obtained is achieved, whichever occurs first.

3. Personal data processed in connection with contacting the Sailing-Dutchman / by the Sailing-Dutchman, in person or using electronic means of communication (e.g. e-mail, telephone, messengers, Teams application) are processed in connection with the matter to which the contact or correspondence relates, including in order to maintain business relations with clients of the Law Firm.

The legal basis for the processing of personal data is Article 6(1)(f) of the GDPR (processing is necessary for purposes resulting from legitimate interests pursued by the controller or by a third party).

In the case of processing personal data to implement the legitimate interests of the controller, these data will be processed for the period necessary to achieve the purpose of processing indicated above, i.e. until it is completed, or until an objection to such processing is raised, unless there are legitimate grounds for further processing.

4. In the case of exchanging correspondence or other kind of contact, whether in person or using electronic means of communication (e.g. telephone, instant messengers, Teams application) in connection with the performance of the contract concluded with the Law Firm, personal data are processed on the basis of Article 6(1)(b) of the GDPR (processing is necessary to perform a

contract to which the data subject is a party, or to take action at the request of the data subject before the conclusion of the contract).

Personal data will be processed by the Sailing-Dutchman for the duration of the Agreement, and after its termination or expiry – for a period resulting from applicable law or provided for due to archiving obligations. These periods may be extended if it is necessary to establish, investigate or defend against claims arising from the implementation of the Agreement. Detailed information about the processing of personal data in connection with the conclusion of the contract with the Law Firm, the client of the Law Firm receives in connection with the conclusion of the contract.

5. Providing personal data is voluntary but necessary to achieve the purpose of processing.
6. The recipients of personal data are authorized employees / co-workers of the Law Firm and entities such as: subcontractors cooperating in the performance of the Agreement, IT system and IT service providers, with whom the Sailing-Dutchman has concluded relevant contracts. Data recipients can also be courier companies and postal operators. In addition, personal data may be disclosed to competent authorities authorized in accordance with applicable law.
7. In accordance with the terms set out in the GDPR, data subject has the following rights:
  - a. right to request the Data Controller to provide access to, rectify or erase personal data;
  - b. right to request the Data Controller to limit the processing;
  - c. right to data portability.

In addition, the data subject also has the right to object to the processing of his personal data based on the basis indicated in point 2 item b above, for reasons related to the specific situation.

8. Notwithstanding the foregoing, data subjects also have the right to lodge a complaint with the President of the Office for Personal Data Protection when they consider that the processing of personal data concerning them violates the provisions of the GDPR.
9. The data subject has the right to withdraw given consent to data processing at any time. Withdrawal of consent to data processing does not affect the lawfulness of the processing based on the consent before its withdrawal.
10. In order to exercise your rights, obtain additional information or withdraw your consent to the processing of personal data, relevant information should be sent via email to the following email address [rodo@sailing-dutchman.com](mailto:rodo@sailing-dutchman.com), or by regular mail to the following mailing address: Różana 53, 02-569, Warszawa.
11. The data subject is not subject to automated decision-making, including profiling.
12. The Data Controller applies appropriate technical and organizational measures to ensure the protection of personal data processed, appropriate to the risks and categories of data to be protected. At the same time the Controller notes that the use of the Internet and services provided by electronic means may involve the risk of harmful software entering the user's ICT system and device, as well as unauthorized access to the user's data, including personal data, by third parties.

## II. COOKIE POLICY

1. This Cookie Policy is addressed to the [sailing-dutchman.com](http://sailing-dutchman.com) website users (hereinafter referred to as the Users).
2. The controller of the [sailing-dutchman.com](http://sailing-dutchman.com) website (hereinafter referred to as the Website) and the controller of Cookies is Sailing-Dutchman Sp. O.o. with its registered office in Warsaw, ul. Bawełniana 19a, 01-487 Warsaw, entered in the Register of Entrepreneurs maintained by the District Court for the Capital City of Warsaw, 13th Commercial Division of the National Court

Register, under number KRS 0001054707, NIP 5223268765, REGON 526208696 (hereinafter referred to as the Controller).

3. The Controller uses Cookies and Google Analytics, i.e. a web analytics system that allows for the analysis of website traffic, to ensure the proper functioning of the Website, to maintain and monitor the status of the User's current session, as well as for analyses, statistics and audits relating to the Website visits.
4. Cookies are small pieces of text sent by a web server to the User's browser and sent back when the User accesses the website again. Cookies make it possible to remember the User's preferences.
5. The Controller uses two types of Cookies: session cookies, that are permanently deleted by the User at the end of the User's browser session, and permanent cookies that remain after the end of the User's browser session until they are permanently deleted.
6. When using the Website, the following data may be collected: IP address, domain name, browser type, operating system type.
7. Web browsers normally allow cookies to be stored on the User's terminal device by default. The User may withdraw his/her consent at any time or refuse to give his/her consent by changing the settings of the browser which he/she uses to browse the Website. Most web browsers allow users to delete cookies from their computers or to disable cookies. Blocking cookies placed by the Website may render some of the Website's functions difficult or inoperative. More information about cookies is provided in the instructions of each browser and the content of the "help" section of that browser.
8. By clicking "I agree" or continuing to use the Website, without changing the cookie settings in the User's browser, the User gives consent within the meaning of Article 173(2) of the Act of 16 July 2004 Telecommunications Law to the use of cookies in accordance with the current settings, including to the Controller storing or accessing Cookies on this device, on the terms set out in this Cookie Policy.
9. If the possibility of saving cookies in the User's browser is deactivated, the above-mentioned data will not be processed.
10. Using this website without changing the Cookie settings means that the Cookies will be placed on the User's terminal device. Cookies do not store or remember the User's personal data, nor do they make it possible to identify the User.

### **III. FINAL PROVISIONS**

1. The information posted on the sailing-dutchman.com website is for reference purposes only and cannot be considered as legal advice on any matter.
2. All materials made available on the sailing-dutchman.com website are copyrighted.
3. The sailing-dutchman.com website may contain links to other websites. The Controller is not liable for the security and privacy practices of these websites.
4. Any additional queries or information relating to this Privacy Policy or Cookie Policy should be addressed to [info@sailing-dutchman.com](mailto:info@sailing-dutchman.com).
5. This document is governed by Polish law.