



PRIVACY POLICY

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Introduction

We are Holland Norway Lines BV with company registration number 78705908 ("Holland Norway Lines") and are responsible as data controller for the processing of your personal data. All references in this privacy policy to "we", "us" or "our" should be considered a reference to Holland Norway Lines. Our contact information is included in the end of this privacy policy. We respect your privacy and are committed to protecting your personal data.

The following sites are referred to as our "Websites":

www.hollandnorwaylines.com,
www.hollandnorwaylines.nl,
www.hollandnorwaylines.no

Our Websites and other communication interfaces (e-mail, telephone, support contact, social media, chat and paper forms) are referred to below as our "Services".

Scope of privacy policy

This privacy policy applies to our processing of your personal data when you as a customer and/or visitor to the Website use our Services including if we obtain your personal data from a booking agent that you or the company that you are employed by has contracted. This privacy policy, inter alia, contains information about the purposes for which we process your personal data, with whom we share it, and what rights you have in relation to your personal data.

For information regarding how we handle cookies, please see our [Cookie Policy](#).

What categories of your personal data do we process?

Holland Norway Lines processes the following categories of personal data:

- (a) Name;
- (b) Birth date;
- (c) Age group (children between the age of 0 - 3 and 4 – 15, <18);

- (d) Gender;
- (e) Contact details (address, telephone and/or mobile phone number and email address);
- (f) Payment details (vouchers and payment type);
- (g) Number of travelling children (if any);
- (h) Booking reference number;
- (i) Itinerary information about your trip(s): (destination, travel times, arrival and departure date, number of travelers, choice of cabin, cabin number, pre-orders (meals, drinks, or snacks), any borrowed bed side covers or baby cribs, pet ownership (to the extent you provide us with such data), special requests to the extent provided to us);
- (j) Vehicle Information (type of vehicle (car, camper, bicycle and/or trailer) and vehicle registration number);
- (k) Your border shop and on-board orders/shopping lists;
- (l) Booking history;
- (m) Used promotion code(s) and security codes (used to verify promotion codes);
- (n) Sales owner (the market where you book a trip or use our Services);
- (o) Nationality;
- (p) Passport or Identification document details;
- (q) Guest list information (booking customer and travelling companions);
- (r) Your pet's identification number;
- (s) Information about who claims to be a parent of a minor;
- (t) Date of suspension (if a passenger breaches the safety on board regulations);
- (u) Disability information (to the extent provided to us if you require assistance, have impaired hearing, require medication, require a wheelchair or are visually impaired);

- (v) Site information based on your IP address;
- (w) Browser information (browser version);
- (x) Answers to customer satisfaction surveys to the extent provided by you (name, telephone number and e-mail);
- (y) Your employer and position (for business travelers).

From where do we obtain your personal data?

Holland Norway Lines collects your personal data directly from you when you book a trip, accommodation, make any kind of reservation or purchase or in any other way use our Services (by visiting our Website or by contacting us).

Holland Norway Lines also collects personal data from travel agents that you have instructed to provide us with your personal data. The information is held in the country where the travel agent stores the personal data.

What happens if you do not provide us with your personal data?

In order for you to book a trip through our Services it is necessary that you provide us with the personal data as specified above in Section 3(a)-(p). If you do not provide us with the personal data, we will not be able to fulfill or contractual obligations towards you and you will consequently not be able to book any trips through the use of our Services.

For what purposes do we process your personal data and what is the legal basis for such processing activities?

Holland Norway Lines processes your personal data for the purposes set forth below. For each purpose Holland Norway Lines must have a legal basis. A legal basis could e.g. be (i) your consent to the relevant processing activity, (ii) that the processing is necessary in order for the performance of a contract to which you are a party, or (iii) that Holland Norway Lines or a third party has a legitimate interest to process

the personal data which is not overridden by your interest of not having the personal data processed. Under each purpose listed below, the legal basis that Holland Norway Lines relies on will be identified.

If your consent is identified as the legal basis for a purpose listed below, we will not process your personal data for such purpose without having obtained your consent thereto. Furthermore, you have the right to withdraw your consent at any time by sending an opt-out message to privacy@hollandnorwaylines.com. Please note that the withdrawal of consent does not affect the lawfulness of the processing based on such consent before its withdrawal.

(a) Provide trips, accommodation and contractual Services

Holland Norway Lines uses name, birth date, age group, gender, contact details, payment details, number of travelling children, booking reference number, itinerary information about your trip(s), vehicle information, your border shop and on-board orders/shopping lists, booking history, used promotion code(s) and security codes and sales owner to administrate and provide your booked trips, accommodation, any pre-orders and Services in accordance with the [Terms of Travel](#). This processing of your personal data is based on our contractual obligations towards you.

(b) Provide our Services

Holland Norway Lines uses name and contact details to communicate with you when you use our Services. This processing of your personal data is based on our legitimate interest.

(c) Administration

Holland Norway Lines uses guest list information in order to administrate refunds, insurance errands and customer complaints related to your booking(s). This processing of your personal data is based on our legitimate interest.

(d) Comply with legal obligations

Holland Norway Lines processes:

- the disability information you provide to us in order for us to provide you with any required assistance during your trip in accordance with *Regulation (EU) No 1177/2010 of the European Parliament and of the Council of 24 November 2010 concerning the rights of passengers when travelling by sea and inland waterway*.

- your payment details in order for us to store payment details, name and contact details in accordance with the Dutch *Accounting Act* and/or with laws and regulations applicable at relevant local market .

- your name, gender, age group and disability information (to the extent you provide us with such information) in order for us to keep passenger lists in accordance with *Directive 1998/41/EU on the registration of persons sailing on board passenger ships operating to or from ports of the Member States of the Community*.

- your name, gender, birth date, age group, nationality and passport or identification document details in order for us to keep passenger lists and to conduct identity checks in accordance with the *international convention for the safety of life at sea, 1974* and/or with laws and regulations applicable at relevant local market.

- if applicable, your name, birth date and passport or identification document details to the extent such information is included in lists of prohibited passengers that we receive from police authorities. We use such lists to prevent persons from travelling with Holland Norway Lines in order to comply with at each time applicable laws and regulations.

This processing of your personal data is based on our legal obligations.

(e) Provide assistance to passengers with disabilities

Holland Norway Lines processes the disability information you provide to us in order for us to provide you with any required assistance in

relation to booked trips, accommodation and our Services. This processing of your personal data is based on your explicit consent.

(f) Improve our Services

In order to improve our Services (in order to fix bugs, quickly and easily identify and solve Website conversion problems, change the interface so you easily can access the information you search for or to highlight relevant offers on the Website), we will use name, contact details, site information based on your IP address, browser information, booking reference number and itinerary information about your trip(s) to obtain statistics on how you use our Services. We do this by the performance of customer satisfaction surveys and market research or by analyzing your use of our Services. When we use your personal data to improve our Services, we use it in an aggregated form to the extent possible. This processing of your personal data is based on our legitimate interest.

(g) Prevent abuse of Services

To the extent necessary, your name, address and IP address (as relevant in each specific case) may be used in order for us to prevent abuse and credit card fraud. This processing of your personal data is based on our legitimate interest.

You have a right to, at any time, opt-out from receiving direct marketing as described in Section 6(f)-(g). If you do this, Holland Norway Lines will no longer send such direct marketing to you.

(h) Prevent suspended persons from booking journeys

Holland Norway Lines stores date of suspension, name, birth date and booking reference number of passengers that have breached our safety on board regulations in order for us to prevent that such persons book journeys. This processing of your personal data is based on our legitimate interest.

(i) Provide offers, discounts and upgrades based on your purchase

Furthermore, we use name, contact details and itinerary information about your trip to provide offers discounts and upgrades to you based on your purchase. This processing of your personal data is based on our legitimate interest.

(j) Direct marketing

We use name, contact details, itinerary information about your trip(s) and booking history to the extent you have provided us with such personal data when using our Services to send newsletters, offers, relevant information about our Services and reminders of initiated but incomplete bookings. We send you these by mail, text message, e-mail and other forms of electronic communication. This processing of your personal data is based on our legitimate interest.

You have a right to, at any time, opt-out from receiving direct marketing as described in Section 6(i)-(j). If you do this, Holland Norway Lines will no longer send such direct marketing to you.

(k) Handling of customer complaints and defend and/or establish legal claims

We solely use personal data as relevant in each specific case in order to handle any customer complaints or defend and/or establish legal claims. This processing of your personal data is based on our legitimate interest.

You have a right to, at any time, opt-out from receiving direct marketing as described in Section 6(i)-(j). If you do this, Holland Norway Lines will no longer send such direct marketing to you.

(l) Demonstrate compliance with a legal obligation

Holland Norway Lines stores documentation of passport and identification details and information about who claims to be a parent of a minor when performing identification checks in order to demonstrate for relevant

authorities that we comply with the identity check requirement in the *Directive 1998/41/EU on the registration of persons sailing on board passenger ships operating to or from ports of the Member States of the Community* and/or with laws and regulations applicable at relevant local market. This processing of your personal data is based on our legitimate interest.

You have a right to, at any time, opt-out from receiving direct marketing as described in Section 6(i)-(j). If you do this, Holland Norway Lines will no longer send such direct marketing to you.

With whom do we share your personal data?

In order to fulfill the purposes listed above, Holland Norway Lines may share your personal data with the following recipients.

- a. All entities of Holland Norway Lines group of companies
- b. External payment providers
- c. Retail & Food Services in The Netherlands and Norway Other ferry companies, bus carriers, tourist guides, entities providing accommodation services and other contractors (where this is necessary to fulfill your booked trip)
- d. The police, customs or other authorities
- e. Our external Call Center: Troll Travel in The Netherlands
- f. Advertising and retargeting platforms, like Google Adwords, Youtube and Facebook
- g. Service suppliers who we engage in order to provide you services such as web-hosting companies, mailing vendors, analytics providers, information technology providers, event hosting services, etc.

Will we transfer your personal data outside of the EU/EEA?

Holland Norway Lines might transfer some of your personal data to the countries outside the EU/EEA listed below. If the EU Commission has not decided that a country listed below ensures an adequate level of protection for your personal data, then we will provide a

description of the safeguards implemented by us or the legal basis relied on by us to ensure that the transfer of your personal data is in compliance with European data protection legislation.

Country	Safeguard
United States of America	EU-US Privacy Shield framework
Norway	Joint Committee Decision on 6 July 2018. The personal Data Act, including the GDPR.

You are welcome to obtain a copy of the above-described safeguard(s) by contacting our Data Protection Officer. Please see section 11 in this privacy policy for contact details.

For how long do we store your personal data?

Purpose	Type of personal data	Storage period
Provide offers, discounts and upgrades based on your purchase	Name, contact details, itinerary information and booking history	For up to 2 years after the customer relationship has ended
Improve our Services	Site information based on your IP address and browser information	For 26 months after you have used our Services
Direct marketing	E-mail address, sales owner, name and previous destinations	For as long as you subscribe to our newsletter
Provide trips, accommodation and contractual services	Name, birth date, age group, gender, contact details, payment details, number of travelling children, booking reference number, itinerary information about your trip(s), vehicle information, your pet's identification number, your border shop and on-board orders/shopping lists, sales owner, used promotion code(s) and security codes	For up to 14 months after completed travel
Demonstrate compliance with a legal obligation	Passport or identification document details and information about who claims to be a parent of a minor	For 3 months in order for us to be able to demonstrate for relevant authorities that we comply with the <i>Directive 1998/41/EU on the registration of persons sailing on board passenger ships operating to or from ports of the Member States of the Community</i> and/or with laws and regulations applicable at relevant local market
Comply with a legal obligation	Name, birth date and passport or identification document details (in relation to prohibited passengers)	For up to 6 months after a list of prohibited passengers is replaced by an updated version by the police authorities.

Prevent suspended persons from booking journeys	Name, date of suspension, birth date (personal identity number for Swedish citizens) and booking reference number	For up to 2 years after the date of suspension.
Administration	Guest list information	For up to 6 months after completed travel
Comply with a legal obligation	Disability information	For 1 month after completed travel in order for us to provide you with required assistance in relation to booked trip(s), accommodation and any orders/purchases in accordance with our contractual obligations towards you and <i>Regulation (EU) No 1177/2010 of the European Parliament and of the Council of 24 November 2010 concerning the rights of passengers when travelling by sea and inland waterway</i>
Comply with a legal obligation	Payment details, name, contact details, booking reference number, itinerary and vehicle information and Loyalty Club membership number	For up to 10 years in accordance with the <i>Dutch Accounting Standards</i> and/or with laws and regulations applicable at relevant local market
Comply with a legal obligation	Name, gender, birth date, age group, nationality and disability information	For the time up until the ship reaches its destination and thereafter for 24 hours in accordance with the <i>Directive 1998/41/EU on the registration of persons sailing on board passenger ships operating to or from ports of the Member States of the Community and/or other local law and regulation</i>
Handle customer complaints or defend and/or establish legal claims	Solely relevant personal data	For as long as your personal data is reasonably required in order for Holland Norway Lines to handle customer complaints and/or to defend and/or establish legal claims (this will generally be the length of the relevant legal limitation period)

Handle customer complaints	The personal data you have provided in your: <ul style="list-style-type: none"> • initiated but not completed booking, or • completed booking but we have not yet received payment 	For up to one month after the personal data was provided to us
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What rights do you have?

Below is a summary of the rights you have under European data protection legislation. The exercise of these rights is free of charge and you may exercise the rights by sending an email or mail to the contacts listed at the end of this document. You can also use the contact form provided on the web site.

In addition, whenever you receive an email concerning a reservation you have made through our Services, you will be able to link to your reservation to update it. Please do not hesitate to contact us should have any questions regarding your rights (see contact details in the end of this privacy policy).

Note that Holland Norway Lines will always assess a request to exercise a right to determine whether the request is valid. All rights listed below are not absolute and exceptions may apply.

In addition to the rights set forth below, you always have the right to lodge a complaint with a supervisory authority regarding Holland Norway Lines' processing of your personal data.

(a) **Right of access.** You are upon request entitled to receive a copy of your personal data that Holland Norway Lines processes and also to obtain supplementary information about Holland Norway Lines' processing of your personal data.

(b) **Right to rectification.** You have the right to have your personal data corrected and/or

completed if it is inaccurate and/or incomplete.

(c) **Right to erasure.** You have the right to request that Holland Norway Lines erases your personal data without undue delay in the following circumstances:

- the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- you withdraw your consent to a processing activity and there is no other legal basis for the processing;
- you make a valid objection to the processing of your personal data;
- the personal data has been unlawfully processed;
- the personal data has to be erased for compliance with a legal obligation.

(d) **Right to restrict processing.** You have the right to request restriction of the processing of your personal data in the following circumstances:

- the accuracy of the personal data is under examination;
- the processing is unlawful or is no longer needed for the purposes of the processing, but you oppose the erasure of personal data and re-quest restriction instead;
- Holland Norway Lines no longer needs the personal data, but you need the personal data

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for the establishment, exercise or defense of legal claims;

- you have objected to the processing of your personal data and such objection is under verification.

(e) **Right to data portability.** Under certain circumstances you have the right to receive the personal data concerning you which you have provided to Holland Norway Lines in order to transmit these to another service provider if the processing of the personal data is based on your consent or the performance of a contract.

(f) **General right to object.** You have the general right to, at any time, object to the processing of your personal data that is based on Holland Norway Lines' legitimate interests. If you object, we have to demonstrate that we have compelling legitimate grounds for such processing or that we need the personal data for the establishment, exercise or defense of legal claims.

(g) **Right to object to direct marketing.** You have a right to, at any time, object to the processing of your personal data for direct marketing purposes. If you do this, Holland Norway Lines may no longer process your personal data for such purposes.

How can you contact us?

You may come in contact with us through the following communication channels:

Headquarters:

Holland Norway Lines BV, temporary offices:
Ubbo J. Mansholtplein, Winsum

E-mail: info.nl@hollandnorwaylines.com

Subsidiary (data processor on behalf of Holland Norway Lines BV):

Holland Norway Lines NUF, Vestre Strandgate
31, Kristiansand

E-mail: info.no@hollandnorwaylines.com

Please note that we have appointed a so-called



Data Protection Officer that you may contact if you have any questions about the processing of your personal data. Our Data Protection Officer may be contacted at service@hollandnorwaylines.com.