



Cruisinc Group GDPR Compliance Statement

The Cruisinc Group ⁽¹⁾, established in 2008, is a group of Cypriot and Dutch companies with Dutch roots, focusing on providing cruise ships with full catering services in a surprisingly creative and attractive way.

The General Data Protection Regulation is a piece of EU legislation that came into effect 25 May 2018. It aims to keep people's data safer and to give people more say on how their personal information is used. The protection of natural persons in relation to the processing of personal data is a fundamental right and a priority for Cruisinc.

Cruisinc Group ("we", "us" or "our") is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection.

Previous to 2018, we already had a consistent level of data protection and security across our organization, however, it is our aim to be fully compliant with legal requirements of GDPR 25th May 2018.

Our GDPR preparation includes:

- Internal information audit - carried out a company wide information audit to identify and assess personal information we hold, its source, how it is being stored and deletion timeline, the way it is processed and to whom it is disclosed.
- Policies and procedures - existing activities and processes have been revised and whenever needed amended to meet the legal requirements of GDPR.
- Legal basis for processing activities - all our processes and activities have been audited to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to; we maintain records of Cruisinc processing activities, ensuring our obligations under Art.30 of the GDPR and Data Protection are met.
- Privacy policy - of Cruisinc Group is available on our website <https://www.cruisinc.eu/privacy-policy/>. The privacy policy informs all individuals, and not only, whose personal information we process, why certain information is needed, how we use it, the owner's rights and to whom the information is disclosed, presenting also the safeguarding measures we have in place while processing personal data.
- Cookies policy - of Cruisinc Group is available on our website <https://www.cruisinc.eu/cookie-policy/>. We use cookies to provide social media features and to analyze our traffic. We also share information about your use of our site with our social media and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services. You consent to our cookies if you continue to use our website.

(1) The Cruisinc Group of companies consists of the following legal entities:

Cruisinc Holding Ltd. was incorporated on November 9th, 2009 under registration number HE257461

Cruisinc Catering Ltd. was incorporated on March 6th, 2008 under registration number HE224712

Cruisinc Crew Ltd. was incorporated on October 5th, 2018 under registration number HE389499

Cruisinc Support bv was incorporated on April 28th, 1999 under registration number 20071205



- Consent form - prior to even collecting any piece of personal data, We ask for consent. Consent is presented in a clear concise form for the individual to understand.
- 3rd party GDPR statements - whenever we use a third party to process personal data on our behalf (HR tool, Insurance company etc,) we have agreements in place and requested their GDPR statements, ensuring they meet and understand our GDPR obligations.
- DPO - Cruisinc designated a Data Protection Officer, created an email address to address GDPR inquiries dpo@cruisinc.eu, DPO engaged all process owners in the internal audit and process review exercise, raising and promoting awareness of the GDPR across Cruisinc Group, assessing our GDPR readiness, identifying any gaps, revising existing policies and implementing new procedures and measures.

All processes and policies are being revised yearly, unless other legal requirements come in to force and amendments are needed earlier.

01 January 2019

A blue circular stamp for Cruisinc Holding Ltd. with the registration number HE 257461 and a small star at the bottom. To the left of the stamp is a handwritten signature in blue ink.

R. Barendrecht
CEO

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