

# PRIVACY POLICY – SZYMONIDAS SAILING

## Introduction and Data Controller

This Privacy Policy explains how Szymonidas Sailing (a trade name of Maronet B.V.) collects, uses, and safeguards your personal data when you use our services (including our website, booking services, and communications). Maronet B.V. (address: Kerkstraat 6, 5595 CX Leende, The Netherlands) is the data controller for the personal data collected.

## How we collect personal data

Providing personal data is voluntary; however, certain information is necessary to book a sailing trip or use our services. If you choose not to provide required data, we may not be able to confirm your booking or provide certain services.

We collect personal data directly from you in several ways:

- **Website forms:** When you fill out forms on the Szymonidas Sailing website (for example, when registering an account, booking a trip, or subscribing to a newsletter), you provide us with personal information.
- **Communications:** We may collect data when you communicate with us via phone, email, or social media. For instance, if you call us or send a message through a social media platform to inquire about a trip, we will collect the information you give us (such as your name and contact details).

## Personal data we collect and why

We only collect personal data that is necessary for specific purposes related to our sailing trips and services. The types of personal data we collect, and the purposes for which we use them, include:

- **Identity and contact details:** *examples:* full name, date and place of birth, gender, nationality, country and city of residence, email address, and phone number.  
*Purpose:* Used to identify you as a client, make bookings in your name, contact you with trip information or updates, and communicate about services. We also use contact details to send newsletters or marketing communications **if** you have subscribed or consented.
- **Travel documentation:** *examples:* passport number or ID information, and nationality.  
*Purpose:* Required for booking and arranging the sailing trip, especially to comply with legal requirements (such as passenger manifests, customs/immigration if applicable) and to ensure you have the right travel documents for the trip.
- **Health information:** *examples:* any medical or health details you choose to provide, or a confirmation of your health/fitness for the trip.  
*Purpose:* Collected **only** to ensure your safety during the trip and to make necessary accommodations. For instance, knowing about any medical conditions or dietary restrictions helps us prepare and respond to emergencies. This information is treated as sensitive and we will only use it for safeguarding your health and safety. We will ask for your explicit consent when collecting any detailed health information, and you have no obligation to provide health details unless it's necessary for your safe participation.
- **Booking and trip details:** *examples:* the trip you booked, dates of travel, the package or itinerary details, and any special requests or preferences (e.g. cabin arrangements).

*Purpose:* Used to organize and fulfill our contract with you — i.e. to provide the sailing trip and related services you have booked. This includes processing your booking, reserving your spot on the voyage, and making any special arrangements you requested.

- **Communications data:** *examples:* records of correspondence with you, such as emails you send us, messages or comments via social media, or phone call notes.  
*Purpose:* Used to respond to your inquiries, provide customer support, and improve our services. For example, if you email us with a question, we will use your email address and the information in your message to respond and assist you. We may also keep records of communications to track any issues or requests over time.
- **Photos and videos:** During our sailing trips, we sometimes take photographs or videos that may include our customers (for example, group photos or action shots during the voyage).  
*Purpose:* These photos/videos are typically used only by Szymonidas Sailing for promotional purposes, such as sharing memorable moments on our website, in brochures, or on our official social media pages. If do not wish to appear recognizably in any photos or videos, you have the right to opt out – please inform us before or during the trip, and we will respect your preference. If a photo of you has already been taken/used and you later object to it, you can contact us to request removal of that image from our website or social media.
- **Marketing preferences:** *examples:* your preferences for receiving newsletters or promotional emails, and history of what marketing content we have sent you.  
*Purpose:* Used to manage your subscription to our marketing communications. If you have opted in to receive our newsletter or updates, we use your name and email to send those to you. You can unsubscribe at any time.
- **Website usage data (cookies):** *examples:* IP address, browser type, and browsing activity on our site (collected via cookies or similar technologies when you use our website).  
*Purpose:* Used to ensure the website functions properly and to analyze and improve our website's user experience. For instance, we may use analytics cookies to see which pages are most popular or to diagnose technical issues. (See *Cookies and Tracking* below for more details.)

## Legal bases for processing

We process your personal data only when we have a valid legal basis under the EU General Data Protection Regulation (GDPR). Depending on the context, one or more of the following legal bases may apply:

- **Performance of a contract:** When you book a sailing trip or other services with us, we must process certain personal data to fulfill our contract with you (Art. 6(1)(b) GDPR). For example, we need your name and contact details to confirm your booking and provide the trip, and your passport and birth date to arrange travel logistics and comply with laws.
- **Legal obligation:** In some cases we need to process data to comply with our legal obligations (Art. 6(1)(c) GDPR). For instance, we may be required by law to collect and retain certain information for tax, accounting, or regulatory purposes, or to provide information to authorities (e.g. passenger information to immigration authorities if the trip involves international travel).
- **Legitimate interests:** We process certain data as needed for our legitimate business interests (Art. 6(1)(f) GDPR), provided those interests are not overridden by your privacy rights. For

example, it is our legitimate interest to use contact information to communicate with customers and respond to inquiries, or to use photos from trips to promote our services. We also have a legitimate interest in ensuring the security and usability of our website (hence using some cookies/analytics).

- **Consent:** We will ask for your consent in situations where we are required to do so. In particular, for sending marketing emails/newsletters to you, we will only do so if we have your consent (or an existing customer relationship as permitted by law). You can withdraw your consent at any time. Additionally, if we need to process any sensitive personal data such as health information, we will obtain your explicit consent unless another legal basis (such as vital interests) applies. For example, by providing health or dietary information to us for a trip, you consent to our using it for your safety; you can decline to provide such information, but then we might not be able to accommodate specific needs.
- **Vital interests:** In the unlikely event of an emergency, we might process personal data (including health data) to protect your vital interests or those of another person (Art. 6(1)(d) and Art. 9(2)(c) GDPR). For instance, if there is a medical emergency during a trip, we may share relevant information with medical personnel.

### How we use personal data

We use the collected personal data for the following key purposes (largely aligned with what we described above):

- **Providing services and booking trips:** We use personal information to arrange and provide our sailing trips and related services. This includes processing bookings/reservations, ensuring we meet the travel requirements (like passenger lists), providing onboard accommodations, and overall performance of our agreement with you.
- **Communication:** We use your contact details to communicate with you about your booking and trip (e.g., sending confirmations, invoices, pre-departure information, or notices about itinerary changes).
- **Safety and compliance:** We process certain data (like health information or emergency contact details) to ensure the safety of our participants and to comply with legal regulations.
- **Marketing and newsletters:** With your permission, we may use your email address and name to send you our newsletter or promotional offers about future trips, special deals, or news about Szymonidas Sailing. You can opt out of marketing at any time, and every marketing email will include an unsubscribe link or instructions.
- **Promotional materials (photos/videos):** We may use photos or videos from trips in which you might appear for promoting Szymonidas Sailing on our website or social media.
- **Website functionality and improvement:** We use information about how visitors use our website to improve its design, functionality, and content. This may involve analyzing aggregated data from cookies (e.g., seeing which pages are most visited, or ensuring the booking form works correctly across devices). If we use analytics tools, we do so in compliance with privacy laws (e.g., anonymizing IP addresses where possible). You can manage cookie preferences as described below.
- **Legal and administrative purposes:** We may also process personal data as needed for accounting, auditing, and record-keeping purposes. For instance, we keep records of

transactions and invoices which include personal details (like your name on an invoice) to fulfill tax and financial reporting laws. If necessary, we might use personal data to establish or defend legal claims or to handle any disputes.

### Cookies and tracking technologies

Like most websites, the Szymonidas Sailing website uses cookies and similar tracking technologies to ensure it works smoothly and to help us understand how people use it. Cookies are small text files placed on your device when you visit a site. We may use:

- **Essential cookies:** These are necessary for the website to function correctly (for example, to remember your session when you're booking a trip). Without these, certain features may not work.
- **Analytics cookies:** If in use, these cookies collect anonymous statistics about how visitors navigate our site (e.g., which pages are viewed, how long users stay, and how they found our site). This helps us improve the user experience. Any analytics in use will **not** collect personally identifying information. (Currently, we do not use invasive analytics or advertising trackers. If we introduce new cookies or tools, we will update our cookie information accordingly.)

Your choices: Most web browsers automatically accept cookies, but you can modify your browser settings to decline cookies or alert you when cookies are being sent. Keep in mind that disabling cookies might affect the functionality of our website (for example, you might not be able to complete a booking form if session cookies are turned off). For more details on how to manage cookies, check your browser's help documentation. We may also provide a cookie consent tool on our website to manage non-essential cookies, in line with applicable laws.

### Third-party service providers and data sharing

We do not sell or rent your personal data to third parties. However, in order to run our business and provide services to you, we may share your data with certain trusted parties under strict conditions. These include:

- **Service providers (processors):** Szymonidas Sailing uses third-party companies to support our operations – for example, website hosting providers, email and IT infrastructure services, and payment processing companies (if you pay for a trip via credit card or online payment, your payment details will be handled by a secure payment processor on our behalf). We only share the data that is necessary for these providers to perform their functions. They are contractually obligated to protect your information and use it only for the agreed-upon purposes. For instance, our website host stores the data you input on secure servers, and our email service (we use Google's Gmail for business communications) handles our email exchanges – these providers act under our instructions to process your data.
- **Social media platforms:** We maintain profiles on social media (such as Facebook or Instagram) to share content and interact with customers. If you contact us via social media message or comment, we may receive personal information (e.g., your social media username, and any additional info you provide). We will use that information to respond to you.
- **Authorities and legal requirements:** If required by law, we may disclose your personal data to government authorities or other third parties. For example, if sailing to another country, we

might have to provide passenger identification information to immigration or port authorities. Additionally, we may share information when it's necessary to comply with a legal obligation, a court order, or to enforce our terms and agreements, or to protect our rights or the safety of our customers and staff. We will only do this when legally permitted or required.

### International data transfers

Szymonidas Sailing is based in the Netherlands and we strive to store and process your personal data within the European Economic Area (EEA). We do not routinely transfer personal data to countries outside the EEA. However, some of our service providers might be located outside the EEA or use global infrastructure:

- **Email and IT services:** We use Google's Gmail service for email communication. Google is a US-based company, and using Gmail might involve storing or transmitting some data (such as your email address and correspondence) on servers outside Europe.
- **Social media:** If we post photos or content on social media platforms like Facebook/Instagram (which are based in the US), any personal data in those posts (like your image) will technically be transferred outside the EEA to those platform's servers.
- **Cloud storage/backup:** In running our business, we may use cloud-based tools to store or back up information (for example, online document storage or booking management systems)

In all cases of international transfer, we will take appropriate steps to ensure your personal data is safeguarded. This may include verifying that the recipient country has an adequacy decision from the EU or using contracts that incorporate the European Commission's Standard Contractual Clauses, or ensuring the provider is certified under relevant privacy frameworks.

### Data retention – How long we keep your data

We will not keep your personal data longer than necessary for the purposes for which we collect it, unless a longer retention period is required or permitted by law. Retention periods will vary depending on the type of data and the purpose. Generally, we use the following guidelines:

- **Bookings and contractual data:** Information related to your sailing trip booking (such as your contact details, trip details, any documents) will be retained for as long as needed to fulfill the contract and then for a period of up to 10 years after the end of the service. This post-trip retention allows us to handle any follow-up inquiries, comply with legal obligations, or address potential disputes.
- **Legal/financial records:** We keep invoice data and payment records that include personal information (e.g., your name on an invoice) for the period required under Dutch law. For example, tax laws require us to retain financial records for 7 years.
- **Marketing and newsletter data:** If you have consented to receive marketing emails, we will retain the personal data necessary for that (typically just name and email) until you unsubscribe or withdraw your consent. If you unsubscribe or ask us to stop, we will remove your contact from our marketing list promptly and will not continue to send you marketing communications. (We may keep a record of your unsubscribe request to ensure we honor it going forward.)

- **Health and sensitive information:** Any health-related information you provide for a trip is kept only as long as needed for the purpose it was collected. Generally, we will use it for the duration of the trip to ensure your safety. We do not store health data long-term once it's no longer needed.
- **Communication records:** Emails or other communications you send to us may be kept for a few years in our email archives. This helps us have context for any ongoing conversations or questions. However, we will not retain general inquiry emails longer than necessary. If you request deletion of correspondence and we have no ongoing business with you, we will honor that, provided we don't need to keep it for legal reasons.
- **Photos/videos:** Photos or videos taken during trips and used for promotion might be kept indefinitely as part of our promotional archive (for example, we might still display a great photo from a past trip on our website or social media). However, if you appear in a photo and later request it to be removed, we will delete it or edit it to anonymize you.

### Your rights as a data subject

As a user of our services and as a data subject under the GDPR, you have several important rights regarding your personal data. You have the right to:

- **Access Your Data:** You can ask us to confirm whether we are processing your personal information and request a copy of the data we hold about you.
- **Rectification:** If any of your personal data is inaccurate or incomplete, you have the right to have it corrected or updated without undue delay.
- **Erasure (right to be forgotten):** You may request that we delete your personal data, and we will do so in certain circumstances – for instance, if the data is no longer necessary for the purposes it was collected, or if you withdraw your consent (where consent was required) and we have no other legal basis to continue processing. Note that we cannot delete data that we are required to keep by law (e.g., transaction records needed for tax purposes), and the right to erasure is not absolute (for example, it does not apply if processing remains necessary for establishing or defending legal claims).
- **Restriction of processing:** You can ask us to restrict or “pause” the processing of your data in certain situations. This means we would store your data but not actively use it until the restriction is lifted. You might request this if you contest the accuracy of your data (while we verify it), or if you object to our processing and we are considering that objection.
- **Data portability:** For data you provided to us and which we process by automated means based on your consent or a contract, you have the right to request a copy in a structured, commonly used, machine-readable format (for example, a CSV file), and you have the right to have that data transmitted to another controller if technically feasible.
- **Object to processing:** You have the right to object to certain types of processing. You can object at any time to the processing of your personal data for direct marketing purposes.
- **Withdraw consent:** If we are processing any personal data based on your consent, you have the right to withdraw that consent at any time. For example, if you consented to receive our newsletter, you can unsubscribe and thereby withdraw consent to further marketing emails.



- **Not be subject to automated decisions:** Szymonidas Sailing does not currently make any decisions about you using automated processes without human involvement, such as profiling or automated eligibility decisions.

If you wish to exercise any of these rights, you can contact us using the contact information provided in this policy. We may need to verify your identity before fulfilling certain requests (to ensure we don't disclose data to the wrong person). We will respond to your requests as soon as possible, and at least within the timeframe required by law (generally within one month, extendable by an additional two months for complex requests – but we will inform you if an extension is needed).

Finally, if you believe your data protection rights have been violated, you have the right to lodge a complaint with a supervisory authority. Szymonidas Sailing is based in the Netherlands, so our lead supervisory authority is the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). Of course, we encourage you to reach out to us first so we can address your concerns directly – your privacy is important to us, and we will do our best to resolve any issues.

### **Data Security**

We take the security of your personal data seriously. Szymonidas Sailing (Maronet B.V.) implements appropriate technical and organizational measures to protect your information against unauthorized access, loss, alteration, or disclosure. These measures include industry-standard practices such as using secure servers, encryption of data where appropriate, and access controls to ensure only authorized personnel who need to process your data for the described purposes can access it. We also ensure that any third-party service providers we use for data processing (such as our hosting or email providers) are required to maintain adequate security measures. While we strive to protect your data, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. However, we continuously update and audit our practices to improve security and to meet applicable data protection regulations (like GDPR's requirements under Article 32 for security of processing).

### **Changes to this Privacy Policy**

We may update this Privacy Policy from time to time, for example to reflect changes in our services or changes in data protection laws. If we make significant changes, we will post the updated policy on our website and update the "last modified" date.

*(Last updated: July 4, 2025.)*

### **Contact Us**

If you have any questions, concerns, or requests regarding this Privacy Policy or your personal data, please contact us. We are here to help and address any issues you may have about your privacy. You can reach the **Szymonidas Sailing** data protection contact at:

#### **Maronet B.V. (Szymonidas Sailing)**

Attn: Data Protection Officer / Privacy Contact  
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