



Online logbook Privacy Policy

Effective date: 24.06.2021

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This Privacy Policy gives Users a detailed explanation of how Personal Data is processed. Our top goal is maintaining Your privacy. We've created this Privacy Policy to clearly explain how We use and protect Your personal information. Please read Our rules to get the most out of Our platform. Before using the Platform, please read this Privacy Policy carefully.

This Privacy Policy is available for anyone to read, print, download, and save at any time. The Privacy Policy is always available on the Platform and is updated on a regular basis. By supplying any of Your personal information, as well as accessing and using the Platform, You acknowledge and agree that You have read, fully accept, and agree to be bound by this Privacy Policy. Please do not use the Platform if You do not agree to the terms of this Privacy Policy.

We must inform You that while We utilize all reasonable efforts to protect Your Personal Data, We cannot guarantee that it will not be vulnerable.

This Privacy Policy is written according to the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR). The Data Protection Regulation is a directly applicable legal framework in all EU Member States.

If You have any questions about the way Your Personal Data is handled, please contact Us at the address below.

1. Terms & Conditions

"Online logbook" - refers to "Glory Yachting OU", and its affiliates, parents, and subsidiaries, Tax number: 14285851, registered under the address: Harjumaa, Keila linn, 76605, Estonia, incorporated under the laws of Estonia (hereinafter - "Company", "We", "Us" or "Our").

"Platform" - the website online-logbook.eu and all its content and links, which can be used by You (also occurs as **"Website"**).

"Personal Data" - any voluntarily provided information related to an identified or identifiable natural person.

"Automatically-collected information" – information collected about a User in an automatic way within the Website, or by related to the Website Third Parties.

"Data Subject" – the individual who uses the Platform and who, unless otherwise specified, coincides with the Data Subject (hereinafter – **"You"**, **"Yours"**, **"User"**).

"Processing" – any operation or set of operations which is performed on Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

"Third Party" – a legal person, public authority, agency, or body other than the Data Subject, Controller, Processor, and persons who, under the direct authority of the Controller or Processor, is authorized to process Personal Data, other services which are integrated into the Platform and individuals who can receive cruise list or other information from the Platform.

"Cookie" – is a little piece of record-keeping data that many websites, including Our Website, store on a User's computer. Cookies are typically used to quickly identify a User's computer, browser, or device and to "remember" information about prior visits (such as the User's use of various features on the Service).

"Service" – the services provided by the Company through the Platform include the opportunity for Users to have an electronic book of sea voyages instead of a physical one. The Services also include interaction with other services, which helps Users to automatically add information to the voyage book, as well as information that is associated with such a book.

"Data Controller" – Company which determines the purposes and means of the Processing of Personal Data (also occurs as – **"Controller"**).

"Data Processor" – means a natural or legal person, which processes Personal Data on behalf of the Controller, specified in this Privacy Policy (also referred to – **"Processor"**). Companies to which the Company transfers information based on the User's consent or a contract may be considered Processors for the purposes of this Privacy Policy.

2. Controller info

Name of the legal person: Glory Yachting OU

Tax number: 14285851

Origin and/or legal address: Harjumaa, Keila linn, 76605, Estonia

3. Purposes of Processing and legal basis for Processing

The purpose of Data Processing is to provide and deliver the Services on the Platform and send You related information as requested by You/as agreed with You.

Legal grounds of Data Processing are the purposes for which the Personal Data is intended as well as the legal basis for the Processing.

Fulfillment of obligations and/or provision of Services by Us, including:

- Providing and managing Your account;
- Your recognition when You enter into Your Website account;
- Providing and managing Your access to Our Website;
- Supplying Our Services to You;
- Distribution of marketing materials about new products of the Company, changes or updates;
- Data Processing in connection with the legal obligations of the Company;
- Keeping You informed about the Service and features, offers;
- Better understanding Your needs, diagnose problems, analyze trends, improve the features and usability of the Services;
- Analyze Your use of Our Website and gather feedback to enable Us to continually improve Our Website and Your User experience;
- Sending You notifications about updates to Our Services, advertising, commercial communications;
- Personalizing and adapting Your experience with Our Services, such as by showing or suggesting relevant content and advertisements. The goal of targeted advertising, such as that seen on Facebook and Google, is to offer each customer adverts for items and services that they are interested in rather than completely random ads;
- For any other purpose for which You provide consent.

We apply the following principles in the protection of Personal Data:

- We collect Personal Data that You voluntarily provide to Us.
- We collect and operate Personal Data of Our Users to provide as best Services as We can.

- We only store a particular amount of Personal Data, which We strictly need for providing You Services. And no byte more.
- The collected Personal Data must be accurate, complete, and up-to-date as necessary for Our purposes.
- The Personal Data is stored in a form that allows the User to be identified for no longer than it is necessary to fulfill the purposes of its Processing.

We make every effort to protect Our Services and You from risks such as loss or unauthorized access to Personal Data, as well as its deletion, use, modification, or disclosure.

We are responsible for the Personal Data provided by the User and are ready to demonstrate compliance with the measures indicated in this Privacy Policy.

The Company, with the consent of the User or on the basis of a contract, may receive or transfer data to other Processors. Such data transfer facilitates the interaction of the User with the Platform. The purpose of this integration is to make it easier for the User to fill in data, to maximize the effectiveness of the use of the Platform Services, as well as to expand the opportunity for innovation and the exchange of Personal Data between Data Controllers in a safe and secure manner under the control of the User. The Company is not responsible for the use, storage of information by other Controllers and Third Parties who received information from the Company. In order to find out what information about You was transferred and to whom, please contact Us via email: info@online-logbook.eu.

4. Data Policy

4.1. What do We collect when a User visits Our Website?

4.1.1. Personal Data provided by Users

We may collect and preserve Personal Data that You provide to Us willingly. Any information that potentially identifies You or another User as a natural person is considered Personal Data. Users can opt to make an account on a Website, receive an email invitation from another User, or create an account with a Google or Facebook profile because they can engage within Our Website following registration. That is what We usually collect:

- a name & surname;
- email;
- phone number;
- date of birth of the User;

- a list of the User's yacht licenses and the details of these licenses (including the issuing authority, license number, date of issue and license validity period, date of birth, photo, etc.). The Company may receive data from licenses from other Processors;
- information contained in Your Google or Facebook profile if You signed in with Google or Facebook. In this case, We kindly recommend You to read Google's Privacy Policy at: <https://policies.google.com>. Facebook's Privacy Policy at: <https://www.facebook.com/policy.php>;

Personal Data provided by the User that relate to other individuals:

- lists of people who have shared the trip with the User;
- list of people to whom the User has sent invitations;
- a list of emails to which the User sent invitations;
- User's logbook, licenses.

Cruise list also contains Personal Data of individuals such as the name and surname of an individual, date and place of birth, passport number.

This information is collected and if needed transferred to other Third Parties in a blurred way. It is strictly User's responsibility to ensure the consent of each individual for such kind of collection. **The Company in no way can be held responsible for any withdrawal or absence of consent.**

Also, when interacting with the Website, You may specify non-personal information about Your activity. Such information may include history of yachting trips, data on the upcoming charter, if the User fills them in before sending the resume.

4.1.2. Personal Data collected Automatically

Such data is collected in an aggregated form and can be attributed to Personal Data and general information.

Such data may include:

- IP address;
- General location information;
- Personal User identifier;
- Time zone;
- First login day;
- Time spent on Website;
- Last login.

4.2. Automatically-collected information

We automatically collect and store the following information about You in an aggregated way:

4.2.1.Cookies

We use Cookies to collect certain usage data, such as visited pages and Services used within Our Website to customize and enhance Your User experience.

Parts of the Website require accepting Cookies in order to function. Targeting Cookies can be disabled from the Cookie settings.

Advertisement settings can also be managed in the User's own Facebook - <https://www.facebook.com/ads/preferences> or Google account - <https://myaccount.google.com/privacycheckup>.

Cookies can also be managed on the computer by using a service designed for that purpose, such as disconnect: <https://disconnect.me/disconnect>.

For more information concerning browser-based online marketing and online privacy:

- 1) <https://www.youronlinechoices.com/>
- 2) <https://policies.yahoo.com/us/en/yahoo/privacy/>
- 3) <https://www.google.com/policies/privacy/>
- 4) <https://privacy.microsoft.com/en-us/privacystatement>
- 5) <https://yandex.com/legal/privacy/>

You can read information about settings in the most popular web-browser on the following links:

| | |
|----------|---|
| Chrome | https://support.google.com/chrome/answer/95647?hl=en |
| Explorer | https://support.microsoft.com/en-us/products/windows?os=windows-10 |
| Safari | https://support.apple.com/kb/PH21411 |
| Firefox | https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences |
| Opera | http://www.opera.com/help/tutorials/security/cookies/ |

We also use local storage objects and other Our tracking technologies and services to automatically collect Usage Data when Users access or use Our Website:

- IP address;
- general location information;
- section / page views;
- a date / time of using;
- device type;
- language;
- the method utilized to submit the request to the server;
- the size of the file received in response;
- analytics data (Google Analytics);
- the various time details per visit (e.g., the time spent on each section within the Website) and the details about the path followed within the Website with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

5. Where do We store the Data?

All Data You provide Us is stored on a secure server in RX name, hosted by Us or Third Parties, providing hosting, payment, or other Services. The server data privacy policy can be found at the following link: <https://rx-name.ua/ru/privacy-policy>.

All Data, or parts of it, may be transferred to and stored in a location outside the European Economic Area ("EEA"), including any location where the privacy rules of the country in question differ from and are less protective than those in the EEA. It may also be processed by people working for Us or one of Our suppliers who are based outside the EEA. Such companies may, for example, offer Us with analytics services or display adverts based on User activity.

Facebook, Google, and Zoho are all based outside of the European Union. They are, however, all significant, dependable companies with a substantial number of clients in the EU, and they adhere to the EU Data Protection Regulation's standards.

More information about data protection in these companies as well as their international data protection certificates can be found at the following links:

Facebook: <https://www.facebook.com/about/privacy>

Google: <https://www.google.fi/intl/fi/policies/privacy/>

Zoho Campaign: <https://www.zoho.com/privacy.html>

By providing Your Personal Data, You consent to its possible transfer, storage, and/or Processing in accordance with Third Party privacy policies and terms and conditions. At the same time,

We select trustworthy partners (and inform You about our choices) and take every precaution to protect the Personal Data We transfer from unauthorized access.

Within the Website, there may be Services with separate and independent privacy policies. Please be aware that We are not responsible for the collection of Personal Data by third parties with whom We are not affiliated. We strongly advise You to read the privacy policies and terms and conditions of any third parties with whom You may engage through Our Website or by being redirected from Our Website.

6. Will Personal Data Be Shared with Third Parties?

We don't sell any of Your information to anyone, and We never will. But We may share information that was collected about a User in certain situations. Personal Data may be disclosed to:

- a. Our professional advisers**
- b. Government and/or regulatory authorities**

There are a few rare circumstances when We may have to share Your Personal Data either to obey the law or protect Our rights. We'll share Your Personal Data only to comply with the laws or legally enforceable requests, to enforce Our rights, under the following circumstances:

Legally required

If We are required to do so by law (e.g., law enforcement bodies, courts, or others).

Protect Our rights

If We believe it is necessary to respond to claims asserted against Us.

c. Third Parties, which are the Processors

Certain Personal Data will also be shared with Zoho CRM software, which is used in customer service, as well as the Zoho Campaign software, which is used to send newsletters and operates under the EU-U.S. Privacy Shield Framework.

Some Personal Data is also shared with Company marketing partners, such as Facebook and Google, for the purpose of displaying activity-based advertisements. By removing "Targeting cookies" from the Website's Cookie settings, the User can opt out of this

type of profiling-based advertising or withdraw consent. The registered User can control their ad preferences directly through the social media networks they utilize.

Some Personal Data is also transferred to analytics companies like Zoho SalesIQ and Google. By analyzing the behavior of our Users We can improve the User experience.

Some Personal Data is also shared with other Third Parties with which the Platform is/will be integrated and We can provide them with Personal Data of Users with the consent of Users. Before using the services of Third Parties, We recommend that You familiarize yourself with their privacy policy.

d. Third Parties who require Personal Data in order to deliver the Services to Users

If the User has given his or her approval, the Company may disclose information about the User with other third parties. If the data provided by the User contains Personal Data of third parties, such data will be transmitted in a blurred way. The Company may utilize other subcontractors not listed above to handle the User's information provided such use is compliant with the EU Data Protection Regulation.

The Company is not responsible for the Processing of data by subcontractors, Third Parties and other Processors who transfer data to the Company or who receive data from the Company.

7. Terms of Personal Data storage

We store Personal Data no longer than it is necessary for comfortable interaction with Our Website and no longer than two years from the deletion of the account. You can always request Us to withdraw any of Your Personal Data. The Controller may be obligated to retain Personal Data for a longer term if ordered to do so by law or by an authority.

In case of deletion of an account, the User will no longer have access to all of the account content.

An exception is the sending by the User of an invitation for a trip. Such a campaign remains with the receiving User until he deletes his account. For the User who sent the trip invitation, the data is deleted when the account is deleted.

8. Rights of User concerning collected Personal Data (EU)

8.1. The User has a right to access his/her Personal Data. A User has the right to obtain from the Company confirmation as to whether or not that Personal Data is being processed, and, where that is the case, access Personal Data.

8.2. The Right to be forgotten. A User can withdraw personal consent in case of outweighing Our legitimate interest in continuing Processing. We may retain a history of User actions (excluding Personal Data) within 30 days of the User's request for deletion of information after the expiration of this period We will delete all information We possess about the User.

8.3. The right to change/delete Personal Data. To limit the Processing of data, Users can withdraw their consent to the collection of Personal Data at any time. A User can also contact Us to amend or delete Personal Data if it is no longer required for the purpose for which it was supplied.

8.4. Right to request Personal Data that We have about a User. We can provide a User with the information We maintain about his activity as soon as possible, but no longer than in 30 days.

8.5. Right to lodge a complaint. The User's Personal Data may be used for legal purposes by the Controller in litigation or the stages leading to possible legal action arising from improper use of this Website. The User declares to be aware that the Controller may be required to reveal Personal Data upon request of public authorities.

8.6. The Right to Object. A User has the right to object to the Processing of his or her Personal Data at any time for reasons relevant to his or her unique situation. Unless the Data Controller can demonstrate compelling legitimate grounds for the Processing that outweigh Your interests, rights, and freedoms, or for the establishment, exercise, or defense of legal claims, the Data Controller will no longer process the Personal Data.

8.7. Right to opt out of direct marketing. The User can forbid the use of their information for direct marketing purposes, marketing research. The User can unsubscribe from receiving marketing emails.

8.8. The right to transfer Personal Data. The Users have the right to request information about them be transferred from one Processor to another, and/or to consent to direct data transfers between Processors. In matters concerning transferring information, please contact info@online-logbook.eu.

8.9. The Right to Restrict the Processing of Personal Data. In some circumstances, a User has the right to request that the Processing of Personal Data be limited. If this right is exercised, We may only handle Personal Data with the User's agreement or for the purpose of determining, putting forward, or defending a legal claim, or for the purpose of protecting a person or a significant public interest.

9. What are the legal grounds for Data Processing?

US residents are subject to federal laws on privacy and Children Online Privacy Protection Act. Residents of California State are also subject to California Consumer Privacy Act 2018, (CCPA) and California Online Privacy Protection Act.

Swiss residents are subject to Swiss-U.S. Privacy Shield.

EU residents are subject to General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) and EU-US Privacy Shield.

There are six legal grounds for processing Personal Data defined in the EU data protection regulation. These are:

- consent;
- performance of a contract;
- compliance with a legal obligation;
- protection of vital interests;
- grounds related to public interest or official authority;
- legitimate interests.

The Company collects and processes Personal Data mainly on the grounds of consent, performance of a contract, grounds related to the Company's compliance with legal obligations, and legitimate interests.

The request for consent is presented in a clear and simple manner, separate from other topics, in a comprehensible and accessible format. The User is also advised that he or she has the right to withdraw permission at any time. Withdrawing consent is covered in further detail elsewhere in this Privacy Policy.

The User can pick which consent-based Personal Data usage purposes he or she consents to under the free consent principle.

Grounds related to the performance of a contract means that certain information has to be collected from the User to make it technically possible to use the Services (includes verification of the User in order to provide the Services to him).

Compliance with a legal obligation means Processing personal information e.g. for the purposes of performing the Company's duties related to accounting and taxation.

The Company may have legitimate interests related to the following functions among others: User services, handling of misuse cases, product and service development, receiving Data from other Data Controllers.

The collecting and Processing of all information listed in section 3 is based on some of these legal grounds.

10. Which sources does the Data come from?

Personal Data is primarily gathered directly from Users or indirectly through cookies. During registration and use of the Services / Platform, information is also generated automatically. If a User refuses to provide Us with all or part of the Personal Data We seek, that User may be unable to access some portions of the Services. We will treat such information in line with this Privacy Policy whether a User gives such Personal Data (whether to Us directly or to others collecting it on Our behalf) or We obtain it with User's agreement from Third parties (such as social network operators) or Processors.

If necessary, Personal Data can also be collected and updated from other registries of the Company and other companies in the same enterprise group or the registries of third parties. Personal Data can also be received from other Processors with the User's consent.

11. Change Of Data Controller

We have the right to purchase the new, sell or transfer Our Company. All User's information will likely be among the items transferred in these types of transactions. We have the right to sell or otherwise transfer Personal Data during a merger, acquisition, bankruptcy, reorganization, liquidation, and similar transactions. We will do Our best to guarantee the same level of security that We currently provide.

12. Personal Data concerning children

Company does not allow anyone under the age of 16, or any other age specified by applicable law in Your jurisdiction, to use Our Services to the extent prohibited by applicable law. If You discover that someone under the legal age has provided Us with Personal Data in an unauthorized manner, please notify Us immediately, and We will take all required actions to erase such information.

13. Applicable law

This Privacy Policy shall be governed by the laws of England and Wales.

All disputes which could arise while using Our Website shall be resolved by the negotiations between the User and Controller via official email.

The official email of the User is the email that was indicated during the registration procedure.

If a dispute is not resolved through negotiations, all disputes arising out of or in connection with this Privacy Policy shall be settled in accordance with the laws of England and Wales. All disputes arising out of or in connection with this Privacy Policy shall be finally settled by the London Court of International Arbitration in accordance with its Rules. The number of arbitrators shall be one. The seat, or legal place, of arbitration shall be London. The language to be used in the arbitral proceedings shall be English.

14. Warranty

We implement and maintain organizational, technical, and administrative procedures to prevent unauthorized or unlawful access, disclosure, or destruction of the Personal Data We collect through the Website or Services, including the implementation and maintenance of organizational, technical, and administrative procedures. Users of the Website must also do their part in protecting the Personal Data, systems, networks, and Service they are utilizing. Unfortunately, no system for transmitting or storing Personal Data can be guaranteed to be completely secure. As a result, while We make every effort to protect Your Personal Data, We cannot guarantee or promise the security of any information, including Personal Data, that You communicate to Us, and You use the Website and supply Us with any information at Your own risk. If by any chance You have reason to believe that Your Personal Data is no longer secure, please immediately drop Us an email at info@online-logbook.eu.

15. Changes to this Privacy Policy

The Company reserves the right in its sole discretion, modify or update this Privacy Policy from time to time, so You should review this page periodically. When We change the Privacy Policy in a material manner, We will update the "last modified" date at the beginning of this page.

16. Contact us

You can contact Us directly by email at info@online-logbook.ru if You have any queries about Our Privacy Policy. Your question will

be answered within 30 (thirty) days, however We will do everything We can to react as soon as possible.