

MSC Cruises Privacy Information Notice based on Article 13 of Reg. (EU) 2016/679

1. Who we are: MSC Cruises and the companies of our group

MSC Cruises S.A., headquartered in Avenue Eugène-Pittard 16, Geneva, Switzerland, registered for tax purposes under number 060.667.071 (CHE- 112.808.357), acting as data controller, MSC Procurement & Logistics SPA (Via Balleydier 7N 16149, Genova, Italy) as representative in the European Union designated by MSC Cruises S.A. and the other companies of our group (as mentioned at section 4.a) of this notice), acting as data processors (collectively, “we” or “us”), are committed to the fair processing of the passengers’ personal data (“your data”). In order to provide you with a great cruise experience, we collect personal data about you on different occasions, such as when you browse the websites of our companies, when you book a cruise or when you make on-board purchases.

Please read carefully this information notice, which is based on article 13 of the General Data Protection Regulation (Reg. (EU) 2016/679 or simply “GDPR”).

For any doubts regarding the content of this document, please contact our designated Data Protection Officer via email at dpo@msccruises.com. You can also send requests in writing to MSC Cruises S.A., Avenue Eugène-Pittard 16, Geneva, Switzerland; in that case, please specify “For the Attention of the Data Protection Officer” on the envelope.

2. Why, when and how we collect personal data about you

Our main objective is to provide you with a great experience during your cruise. Below you will find the main purposes why your data is processed. Please click on each to find out what categories of data are collected and how we use such data in each case.

a. Providing you with information regarding your requests about our cruises (via website, call center or email)

We need to know your name, contact details as well as the content of your request. Without this data, we cannot provide you with the requested information. We will only use this information to answer your request.

In particular, using the different forms on the website you can request to be contacted through different channels (phone, e-mail, SMS, messaging systems, etc.) and we will contact you through the mean you requested or, where indicated, the mean you indicated as preferred. This processing is carried out to take steps at the request of the data subject prior to entering into a contract (Article 6.1(b) GDPR). In addition, and only where you indicate your express and specific consent, we will use your contact details to send you newsletters and marketing communications via email or SMS about our products and services that may interest you. This processing is based on your consent, pursuant to Art. 6.1(a) GDPR), and you can revoke the consent at any time emailing us using the contact email address provided in section 1 of this notice.

In addition, where required by local regulations, phone calls may be recorded for legal purposes and the processing is carried out for compliance with a legal obligation to which the data controller is subject (Article 6.1(c) GDPR). In other cases, if the recording of the call is not mandatory under local laws the calls may be recorded for the protection and reproducibility of verbal commitments if you give your consent to that and they may be connected with other reservation data. The call recordings may also be processed for quality assurance and training purposes based on the legitimate interest of the data controller. If the call is being recorded you will be notified at the beginning of the call.

b. Completing and handling your booking

To travel or stay on-board our ships, you need to provide your name, contact details, date of birth, gender (not always applies) and nationality at booking stage. We also register some information about your cruise choices, such as cabin type and type of cruise experience. We process this data on the basis of our contract with you (Article 6.1(b) GDPR).

You also need to provide information about valid travel documents and visas, where applicable. We process this information to comply with regulatory requirements in the ports of call, therefore on the basis of an existing legal obligation (Article 6.1(c) GDPR). During the booking, in some cases, you could communicate data revealing information about your health or even your religious preferences (for example, food preferences that indicate the observance of a specific religion – such as kosher or halal food – or medical

conditions requiring special attention on-board – such as disabilities, or celiac disease). We collect this data in our Special Needs form and process it only on the basis of your informed and specific consent (Art. 9.2(a) GDPR). It is not mandatory to provide this data, but please be informed that if you do not provide it, we are unable to accommodate your needs on-board.

When you book with a Travel Agency, that Travel Agency will insert the above data into our booking systems, acting as autonomous datacontroller; the Travel Agency will be responsible for the processing it carries out on your personal data and for taking the adequate data protection measures. Please contact your local Travel Agency for information about how it processes your personal data.

c. Sending you personalised newsletters and communications according to your preferences

When you write us a message using the “Contact us” page and indicate that you wish to receive personalised information about our products and services by clicking the consent box, we will contact you via email or SMS to let you know our latest offers and cruise products that we think might be of interest to you. Also, in case you gave us your consent, we will contact you to promote products and services offered by our subsidiaries, e.g. Explora SA (registered seat: Avenue Eugène-Pittard 16 1206 Genève, Switzerland), or by our partners. Similarly, you have the opportunity of providing your informed and specific consent to receive personalised information from us when you sign up for our Newsletter, when you enrol in the MSC Voyagers Club, when you request a brochure or a call from us, as well as when you sign up for a ship visit or participate in one of the competitions we organise. In all the cases above, it is not mandatory to provide your consent to receive personalised messages and offers from us, but without your consent we will not be able to send you personalised offers. Since the processing of your data for the purposes indicated above is based on your specific consent (Article 6.1(a) GDPR), you can revoke this consent at any time by clicking on the “unsubscribe” link at the bottom of a marketing email received from us or by using the contact email address provided in section 1 of this notice. Before you board the cruise ship, we will also register your interest in receiving special personalised offers in your cabin. For example, if you are travelling with children, we will send you specific information about the events we organise for children on board. You can choose not to provide this consent, but in that case you will not receive personalised messages in the cabin during the cruise. We will process your personal data on the basis of our legitimate interests in informing you of the on-board promotions that are active during your cruise and that may enhance your cruise experience (Article 6.1(f) GDPR). You can obtain information about the balancing test upon request by using the contact email address provided in section 1 of this notice.

d. Sending you information about similar products and services to the ones you already booked

When you give us your email in the context of booking a cruise with us, we will send you information about products or services that are similar or related to the ones you booked, unless you exercise your right to opt out of receiving marketing communications from us at the time of booking. For example, we will send you information about drinks package deals or excursion deals that are available on the cruise you booked. If you do not wish to receive this kind of information, please select the opt-out box when booking or click the relevant “unsubscribe” link in any of the emails that we sent you. This data processing is carried out on the basis of our legitimate interests in informing you of similar or related products and services that we offer and that may enhance your cruise experience (Article 6.1(f) GDPR). You can obtain information about the balancing test upon request by using the contact email address provided in section 1 of this notice.

e. Handling requests, complaints and comments

We keep track of the comments and complaints that you make on board in order to adequately respond to your requests. We process these data in connection with our provision of services to you, therefore on the basis of the booking contract (Article 6.1(b) GDPR). You have the option of making an anonymous complaint or comment, but please be aware that in such case it will be impossible for us to follow up on the complaint or to provide assistance and support.

In addition, we can use the content of the request, complaint or comment to improve our services on board. We limit as much as possible the use of data that may identify you personally in this case. This processing is carried out on the basis of our legitimate

interests in developing our services in a way that ensures our guests get a pleasant experience on board, in accordance with Article 6.1(f) GDPR. You can obtain information about the balancing test upon request by using the contact email address provided in section 1 of this notice.

f. Ensuring on-board security

We keep track of the people who are on board at all times in order to be able to handle crisis situations and to ensure everybody's security throughout the cruise. We therefore record your name, cabin number, picture (taken when you come on board), date of birth, people you are travelling with, port of embarkation, port of disembarkation and information about special needs that may require specific assistance in case of emergencies. We further equipped the ships with CCTV recording systems for safety and security purposes with the aim to protect the legitimate interest of our guests and crew on board. We process these data on the basis of the need to ensure public security and to manage potential crisis situations (Article 6.1(d) GDPR). For this processing, the data controller is MSC Cruise Management (UK) Ltd, 5 Roundwood Avenue, London, and the data processor is MSC Cruises S.A., Avenue Eugène-Pittard 16, Geneva.

g. Additional data processing activities on-board

Some additional information about you may be collected during the cruise on paperback forms, in order to enable you to participate in specific activities (for example, the gym or the Spa) or to handle the request of specific packages (for example, the Romantic Sunset package). The data processed varies depending to the specific activity on board, however, we make sure to only collect the strictly necessary data to achieve the specific purposes. You will be required to complete the form if you want to receive that specific offer/event/package requested and we will process the data on the basis of our contract with you (Article 6.1(b) GDPR). We also process some personal data about you to assign you to a dinner table at one of our main restaurants during the cruise, to make sure that you are able to enjoy your meal without having to look for an adequate table for yourself and the people you are travelling with. To assign the tables, our Maître D' takes into account elements such as the size of the group you are travelling with, the place where you booked the cruise and your preferred language. You can request a different table at all times by contacting the Maître D' or the Guest Service on-board. This data processing is conducted on the basis of our legitimate interests in ensuring that all passengers are assigned adequate dinner seating on-board (Article 6.1(f) GDPR).

The information collected on board is stored for as long as necessary for each purpose. You can obtain information about the balancing test upon request by using the contact email address provided in section 1 of this notice.

h. Loyalty Program

We may process your loyalty account details through a unique Voyager's Club ID that contains information about your points balance, account activity, cruiser milestones, and loyalty tier. We create these details for you when you join one of our loyalty programs and update them as you credit bookings and other activity to your loyalty account.

When you play in the onboard casino using your card, we track information of your play and spend in onboard casinos (including how much you spend, loyalty rewards details and gaming pattern). We sometimes use these details to identify guests that may be interested in casino gaming. Alternatively, you can use cash when we would not track your playing information.

i. MSC 360VR App

If you choose to download our mobile application MSC 360VR for an immersive cruise configurator where you can preview the excitement of your next cruise, we will collect your name, surname, date of birth, phone number and email through the app in order to provide you with our catalogue tailored to the selections you make within our app.

j. CCTV related data processing activities

We use closed circuit television ("CCTV") or other surveillance means onboard our ships including at all access points and throughout the public areas. These CCTV cameras record continually and images of you may appear in these recordings. CCTV footage may include sound recordings as well. We perform this activity based on our legitimate interest and use this information for security purposes, to recognize-, identify and

maintain records of incidents, facilitate investigations and remedies, to protect our rights and the rights of our guests, to enable public health measures, to prevent and detect fraud in our casinos; or comply with other legal or regulatory requirements.

Where recordings are not used, we will store recordings for up to 30 days of the date of recording. Recordings extracted from the CCTC system will be processed until it is necessary depending on the circumstances of the specific case and is accessible only with special privileges and access to the recordings is limited by an electronic access control system.

3. How long we store the data

In accordance with Article 5.1(e) GDPR, the personal data that we collect is kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are collected and processed in each specific case, and in any case not longer than as specified by the relevant applicable laws. We have defined a Corporate Data Retention Policy that specifies the timeframe for data processing at the end of which all copies of the personal data are either destroyed or anonymised using adequate techniques that do not permit the re-identification of the data subject. To obtain more information about our Corporate Data Retention Policy please contact us using the contact details provided at section 1.

4. Categories of data recipients and personal data transfer

a. Companies of our group

Depending on the country where the booking is made from, and to provide you with specific services, we share information about you with the companies of our group. All companies are processing the personal data in compliance with the GDPR.

Depending on the country where the booking is made from, your personal data could be processed by one of the companies of our group, acting as data processors upon instructions from the data controller. The companies of the MSC Cruises group that process personal data of European passengers are: MSC Cruises S.A., MSC Crociere S.p.A., MSC Cruise Management UK Ltd, MSC Cruises UK Ltd, MSC Food & Beverage Division Spa, MSC Kreuzfahrten AG, MSC Cruises Belgium NV, MSC Cruises Scandinavia AB, MSC Kreuzfahrten (Austria) GmbH, MSC Netherlands B.V., MSC Cruises Ltd – Cyprus, Mediterranean Shipping Cruises Cruceros Sau and MSC Kreuzfahrten GmbH.

In limited cases, the above mentioned companies could act as data controllers in relation to a specific data processing activity (for example, when competitions are organized and handled at local level). In such cases, we will provide you with a separate privacy information notice in relation to that specific activity.

Personal data of passengers in the EU is not usually shared with companies of our group that are located outside of Europe. However, should data need to be transferred to a non-EU/EEA country, MSC Cruises will adopt relevant safeguards to ensure that the transfer is carried out in compliance with the applicable privacy legislation, in particular the provisions of the GDPR.

b. Commercial partners

Some services that you book with us are provided by our commercial partners. For example, some shore excursions or experiences may be provided by local tour guides that have been carefully selected by MSC Cruises for their knowledge and experience. We need to communicate your name to such partners in order to provide you with the service you booked. In such cases, we only communicate the data that is strictly necessary and we have agreements in place with our commercial partners to ensure that the data we communicate to them is used only for specific purposes related to the fulfilment of your request.

Our commercial partners operate in the following industries:

- Tourism (e.g. tour operators, local tour guides);
- Transportation services (e.g. bus, train, airplane or other means of transportation depending on type of service required on a case by case basis);
- Insurance companies (e.g. when there is a need to activate your insurance package during a cruise);
- Restaurants and shops (e.g. where you sign up for a lunch, dinner or for special offers); in some cases, where lunch/dinner is included in a package offered by us and provided by one of our commercial partners, we communicate data about allergies or food preferences that may reveal health information about you. We take utmost care

to only reveal your identity when this is strictly necessary and, where possible, we work with anonymous data.

Thus, personal data of are transferred to a non-EU/EEA country if the commercial partner is based outside the EU/EEA. MSC Cruises adopts relevant safeguards to ensure that the transfer is carried out in compliance with the applicable privacy legislation, in particular the provisions of the GDPR, either by signing a specific contract with the commercial partner or by signing appropriate safeguards as approved by the European Commission, as the case may be.

c. Data sharing with port agents and authorities

As a travel operator, we need to share some information about our passengers with local port agents and authorities for immigration purposes. The sharing of data with these agents and authorities can trigger the transfer of data outside the EU/EEA if these entities are based abroad, outside the EU/EEA. These data are shared and transferred based on the legal obligation that MSC Cruises has in relation to the provision of information to the relevant authorities, and only the strictly necessary data is communicated.

5. Your data subject rights

The GDPR provides for enhanced rights and MSC Cruises is committed to giving you the appropriate control of your own personal data. In particular, you have the following rights in connection to your personal data:

- a. The right to access your personal data** and obtain specific information about how we process it, in accordance with Article 15 GDPR; please be aware that you can only exercise this right in relation to your own data or to the data of a minor or another vulnerable person, where you have provided such data as a holder of parental authority or legal responsibility. MSC Cruises reserves the right to ask for proof of identity, as well as to refuse to provide the personal data if the identity or relevant connection to the data subject cannot be proven.
- b. The right to rectify your personal data**, in accordance with Article 16 GDPR, including by means of providing a supplementary statement.
- c. The right to obtain the erasure of personal data concerning you**, in accordance with Article 17 GDPR, unless the data are necessary for exercising the right of freedom of expression and information; for compliance with a legal obligation which requires processing by Union or Member State law to which MSC Cruises is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9.2 as well as Article 9.3 GDPR; or for the establishment, exercise or defence of legal claims.
- d. The right to obtain the restriction of the processing of your personal data.** In accordance with Article 18 GDPR, this right may be exercised in the following cases:
 - Temporary restriction, where you are contesting the accuracy of the personal data; in this case, we will restrict the processing of your data for a period enabling us to verify the accuracy of your data and we will provide feedback to you as to the lifting of the restriction;
 - The processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
 - MSC Cruises S.A. no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - Where you have objected to processing pursuant to Article 21.1 GDPR, the processing is restricted pending the verification whether our legitimate grounds override your rights as data subject.
- e. The right to data portability.** In accordance with Article 20 GDPR, you may exercise this right in those cases where the processing is based on your consent or on your contractual relationship with MSC Cruises S.A. or one of the companies of our group, and the processing is carried out by automated means.
- f. The right to object, at any time, to the processing of the personal data**

concerning you. In accordance with Article 21 GDPR, you may exercise this right where the processing is based on the performance of a task carried out in the public interest or in the exercise of official authority vested in us, or where the processing is based on our legitimate interests.

g. The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or which similarly significantly affects you. In accordance with Article 22 GDPR, you may exercise this right unless the processing is necessary for entering into, or performance of, a contract between you and MSC Cruises S.A. or one of the companies of our group; or is authorised by Union or Member State law to which we are subject and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or if the processing is based on your explicit consent.

n. The right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you consider that the processing of personal data relating to him or her infringes this Regulation, in accordance with Article 77 GDPR.

Please find the list of all European Data Protection Supervisory Authorities at the following link: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

To exercise your data subject rights, please write an email to privacyhelpdesk@msccruises.com. Requests may also be sent in writing to MSC Cruises S.A., Avenue Eugène-Pittard 16, Geneva, Switzerland; in that case, please specify “For the Attention of the Data Protection Officer” on the envelope.

6. Changes to this Information Notice

We reserve the right to update, modify, add or remove portions of this information notice at any time. Significant changes to the processing of your personal data will require your approval, in accordance with the applicable legislation. If you would like to obtain a copy of the current or a previous version of the information notice, please contact us using our contact details provided in section 1 of this notice.

7. Website Cookies

Cookies are small text files sent by websites to users' browsers for the purpose of automatic authentication, session tracking and storing of specific information regarding users.

There are essentially three types of cookies used on this website:

Technical cookies

Required for navigation within the site and to use some of its functions (e.g. timing the display of certain pages in so-called “pop-up” mode etc.).

Statistical cookies (Google Analytics)

Supplied and managed by Google to provide a statistical analysis of access to the website. The information is solely collected anonymously and in aggregate form and no personal user data is retained. You can decide not to use Google Analytics cookies by following the instructions at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

Profiling cookies

Supplied and managed by third parties to generate specific advertising messages based on browsing habits and the interests of individual users. These cookies do not, however, use sensitive user data. This Website currently uses Google Doubleclick cookies. For more information, including information to opt out from the cookie, please click the following link: <https://policies.google.com/technologies/ads?hl=en-GB>

Accept Refuse

Media cookies

Depending on the country from which the booking is made, and to provide you with specific services, we share information about you with the companies of our group. All companies are processing the personal data in compliance with the GDPR.

Accept Refuse

Cookie opt-out

Cookie functions can be disabled via the appropriate page made available by the EDAA (European Interactive Digital Advertising Alliance)

<https://www.youronlinechoices.com/> or by checking the "Privacy" settings of your Internet Browser.

Please note that disabling cookies may impair the correct functioning of the certain website sections.

8. Contact us

MSC Cruises S.A. and the companies of the MSC Cruises group are fully committed to ensuring that your privacy is respected at all times and that the personal data processing put in place is compliant with the applicable data protection legislation. If you have any doubts or questions about the data processing carried out by us or by one of the companies of our group, please contact us using our contact details provided in section 1 of this notice.

Last update: 20.12.2022