

Privacy Policy on April 16, 2025

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1. Preamble and General Information

This Privacy Policy aims to inform clients, prospects, and partners (*hereinafter referred to as the "Users"*) about how **YACHTING CONCEPT MONACO S.A.R.L**, a limited liability company registered with the Trade and Industry Registry (RCI) of the Principality of Monaco under number 19S08269, with its registered office located at 36 Rue Grimaldi – 98000 MONACO (*hereinafter the "Company"*), processes their personal data in connection with its business activities, which include the purchase, sale, rental, management, and brokerage of pleasure and commercial vessels, as well as all event-related operations in the yachting sector.

To carry out its activity, the Company, in accordance with applicable legal and regulatory provisions, needs to collect, process, and store various types of personal information about Users. Its goal is to comply with applicable regulations to provide high-quality service, ensure the protection of the different parties brought together for economic transactions, and respect the privacy and personal data of the Users and partners with whom it interacts.

To this end, the Company commits to limit the collection of personal data strictly to what is necessary for specific and defined purposes and to apply appropriate solutions to the collected information. No data will be sold.

Generally, the Company processes personal data in accordance with European data protection legislation (*GDPR – Regulation EU 2016/679*). Specifically, such data is processed in strict compliance with Monegasque legislation, particularly Law No. 1.165 of December 23, 1993,

on the protection of nominative information, as amended by Law No. 1.353 of December 4, 2008, and Law No. 1.565 on personal data protection dated December 3, 2024.

According to the above European legislation, the term "*personal data*" refers to: Any information relating to an identified or identifiable natural person ("*Data Subject*"); an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identification number or to one or more specific elements particular to their physical, physiological, psychological, economic, cultural, or social identity.

Accordingly, this policy aims to clarify the types of personal data collected, the purpose and means of collection and processing, the methods and duration of retention and protection, and any relevant information on their use, in compliance with the aforementioned Monegasque legislation.

By this policy, the Company commits to ensuring the protection, confidentiality, and security of the processed nominative data, in accordance with the legal obligations in force in the Principality of Monaco.

2. Data Controller

The Company is the data controller for the personal data it processes in the course of its business, particularly for the data collected and processed as part of the contract with its clients.

The Data Protection Officer responsible for processing is **XXX**.

For any questions regarding this policy or to exercise your rights, you may contact the controller at the following address: **[dedicated data protection email address]**.

3. Nature of the Data Collected

The data collected is strictly necessary for the purposes outlined in Article 4 of this Policy.

It may includes :

- Identity information: name, first name, nationality, date and place of birth,
- Copies of identity and address verification documents,
- Personal contact details: postal address, email address, phone numbers,
- Financial information: bank details, asset, or tax status within the framework of AML/CFT regulations,
- Data related to service usage and commercial relationships (reservations, transaction history, payment details, billing data),
- For legal entities, all data establishing identity, such as: certificate of incorporation, certificate of incumbency, certificate of good standing,
- Additional data may be requested depending on the nationality of Clients or Users to ensure compliance with current AML/CFT regulations.

In certain cases, we may ask for your email address, such as via the online contact form, to be able to contact you and notify you of updates, information, comments, or other transactional messages. We reserve the right to verify the authenticity of this email address for security and fraud prevention purposes.

The Company automatically collects certain information when you visit, use, or navigate its online services. This information does not reveal your specific identity (like your name or contact details) but may include device and usage information such as IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, and information about how and when you use our services. This information is primarily used to maintain the security and operation of our services and for internal analytics and reporting.

Like many companies, we also collect information through cookies and similar technologies.

4. Purposes of Data Processing

The data processing carried out serves the following purposes:

- Managing requests for information, quotes, or bookings (for yacht rental or purchase),
- Managing commercial and administrative relationships (including billing),
- Executing contracts concluded with clients or partners. We may process your personal information when we deem it necessary to fulfill our contractual obligations to you, including the provision of our services, or at your request before entering into a contract with you,
- Managing business relationships and maintaining customer contact,
- Complying with legal and regulatory obligations, particularly with respect to anti-money laundering and counter-terrorist financing (AML/CFT),
- Ensuring a quality service in compliance with legal and regulatory requirements,
- Sending commercial communications and promotional offers, subject to the express consent of the User.

Please note that failure to provide certain data may prevent the establishment of a commercial relationship between the Company and the User.

5. Protection of Personal Data

We place the utmost importance on data confidentiality and protection. Access to collected personal data is strictly limited to the Company's employees and data processors who need access to this information.

The Company may use other companies to process the collected personal data. These companies are considered subcontractors and are subject to strict contractual obligations to maintain the confidentiality of the data processed and to offer a level of security at least equivalent to that of the Company. Subcontractors are required not to allow third parties to process personal data on behalf of the Company and must access, use, and/or retain the data in a secure and confidential manner.

Due to confidentiality and security requirements, specific information about the names and details of each subcontractor will only be disclosed to the competent authorities.

Unfortunately, data transmission over the Internet cannot be 100% secure. Therefore, despite all efforts to protect personal data, YACHTING CONCEPT MONACO cannot guarantee the security of information transmitted by the User until it reaches our servers. When you transmit information, you do so at your own risk.

6. Legal Basis for Processing

In accordance with this policy, the Company is committed to complying with applicable regulations on personal data protection, particularly the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, and Monaco's Law No. 1.565 of 3 December 2024 on the protection of personal data.

According to Law No. 1.565, the processing activities are based on:

- The performance of a contract or pre-contractual measures,
- Compliance with a legal obligation to which the Company is subject,
- The consent of the data subject, particularly for sending marketing communications,
- The Company's legitimate interest in developing its business relationships, while respecting the fundamental rights of the data subjects.

7. Data Recipients

As a rule, the Company will not disclose personal data relating to its Users to third parties, except in the cases mentioned above.

By way of exception, personal data may be shared, strictly within the limits of their respective responsibilities, with the following recipients:

- Monegasque or foreign administrative or judicial authorities, upon request, where required by legal or regulatory provisions, or when necessary to protect the rights and interests of our clients and the Company,
- Certain public bodies, when necessary,
- The Company's internal departments (sales, legal, accounting),
- The Company may also grant limited access to its authorized partners, service providers, and subcontractors acting on its behalf, notably for data hosting, IT maintenance, and marketing. Only certain customer-related data will be accessible, and solely for the purpose of fulfilling contractual obligations between the Company and the partner,
- The Company may also share your information with our affiliated companies, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

All Company partners are subject to strict contractual obligations to maintain data confidentiality and to provide a level of security at least equivalent to that of YACHTING CONCEPT MONACO. These partners are prohibited from granting third-party access to personal data processed on behalf of the Company.

8. Data Retention Period

Data is retained for the duration necessary to fulfill the contract and then archived in accordance with applicable legal deadlines.

For example:

- Client management data: 5 years after the end of the commercial relationship,
- Marketing prospect data: 3 years from the last contact,
- AML/CFT-related supporting documents: 5 years after the termination of the relationship,

- Personal data processed in accordance with our tax and accounting obligations will be retained for 10 years from January 1 of the year following the relevant accounting period.

This retention is necessary to provide evidence or a defense in the event of any complaints related to contractual matters.

Personal data will be retained and processed for the duration necessary to perform the contract, corresponding to the length of the business or contractual relationship, followed by any time needed for the settlement and confirmation of rights, legally applicable limitation periods, and exhaustion of legal remedies (notably for handling potential disputes). Financial and billing data will be retained in accordance with tax and accounting regulations.

9. Users Rights

In accordance with Monegasque law, individuals have the following rights:

- Right to access, rectify, update, or delete their data,
- Right to object, on legitimate grounds, to the processing of their data,
- Right to withdraw consent at any time, where processing is based on consent,
- Right to lodge a complaint with the Commission de Contrôle des Informations Nominatives (CCIN).

To exercise these rights, you may submit a written, dated, and signed request to the registered office of YACHTING CONCEPT MONACO mentioned above, or by email to the data controller at the address specified above, accompanied by a copy of a valid form of identification.

You also have the right to lodge a complaint with a competent data protection authority.

10. Protection of Minors

We do not knowingly solicit data from children under the age of 18, nor do we market our services to them.

11. Security of Processed Data

The Company implements appropriate technical and organizational measures to ensure the security, integrity, and confidentiality of personal data, particularly to prevent unauthorized access, loss, alteration, or disclosure.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure. Therefore, we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or alter your information.

12. Transfers of Data Outside Monaco

Personal data will not be transferred outside the Principality of Monaco, except in the following cases:

- When such transfer is necessary for the performance of a contract or the implementation of pre-contractual measures,
- When the data subject has expressly consented to the transfer,
- When the transfer is made to a country recognized as providing an adequate level of data protection or subject to safeguards that comply with CCIN requirements.

The Company may host or transfer personal data within the European Union (EU) or to any other jurisdiction that offers an adequate level of protection for personal data in accordance with EU standards or other appropriate safeguards, including standard data protection clauses.

13. Updates to the Privacy Policy

This privacy policy was adopted on the date indicated in the title of the document.

We may update this privacy notice from time to time to comply with legislative or regulatory developments. The updated version will be identified by a revised update date and will take effect as soon as it is accessible. If we make material changes to this privacy notice, we will notify you either by prominently posting a notice of such changes or by sending you a direct notification. We encourage you to review this privacy notice regularly to stay informed about how we protect your information. This document is available at the following address: <https://www.yachtingconceptmonaco.com/>

14. Modification and Deletion of Data

In accordance with Law no. 1.565 of 3 December 2024 on the protection of personal data and the European General Data Protection Regulation (EU) 2016/679 dated April 27, 2016, Users have the right to access their data, object to its processing on legitimate grounds, request correction, restriction of processing, erasure, or portability of their data by simply sending a request by mail to the registered office of YACHTING CONCEPT MONACO.