

PRIVACY POLICY

A von Brockdorff Services Ltd. understands and respects the importance of your privacy. This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, online or offline, will be processed by us. Please read the following information carefully.

For the purpose of the General Data Protection Regulation (GDPR), we, as A von Brockdorff Services Ltd. and also under our trading name as the Cruise and Travel Group, are the Data Controller both offline and online (at www.avbsl.com, www.vonbrockdorff.com and www.cruiseandtravel.eu).

You are responsible for ensuring that the other members of your party are aware of the content of this Privacy Policy and are in agreement with you supplying their personal data to us to make a booking or other purchase on their behalf.

By making a booking/purchase or submitting your personal data directly or via these web sites, you agree to the transfer, storing or processing of it as set out below. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. If you do not agree to our use of your personal data as set out below we cannot accept your booking and you should not use these web sites.

Information we may collect from you and why we collect it:

When you make a booking or other purchase from us, we will collect certain personal data about you and about any other person you include on your booking. The sort of personal data we collect will be information such as name, address, email address, telephone number, date of birth, and personal travel preferences. We need to collect this information in order to arrange the travel and other services you are requesting. In some cases we may also need to collect more sensitive personal data such as Passport / ID Cards, information concerning medical conditions, disabilities and special requirements, so as to be able to consider your particular needs in relation to a booking. Data will be stored only until it is considered necessary for operational, marketing, research and/or legal purposes. We shall only store data until it is absolutely necessary.

We may also collect personal data about you in the following circumstances:

If we ask you for your contact details for future marketing use (which may be by email, post or phone text messages) or if you actively sign up to receive email newsletters from us, (although you will be given the option to opt-out of such use).

If you contact us, we may keep a record of your email or other correspondence, and if you call us by telephone, we may monitor and/or record phone conversations for training and customer service reasons.

We may collect details of your visits to these sites (including, but not limited to, traffic data and location data) whether this is required for our own purposes or otherwise, and the resources that you access.

We may collect information about your computer including, where available, your IP address, operating system and browser type, for system administration purposes and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Transfer of your information:

When you make a travel booking or other purchase, some of the personal data you provide will need to be passed to and processed and stored by relevant third parties, such as airlines, hoteliers, insurance companies and ground handling agents, so that they can provide you with the arrangements you require. Some of these third parties may be based outside of the European Economic Area ("EEA"). Organisations that are based outside of the EEA may not be subject to the same level of controls in regard to data protection as exist within the EEA.

In order for you to travel overseas, we may be required to disclose personal data to government bodies or other authorities in Malta and in other countries, such as those responsible for immigration, border control, security and anti-terrorism. Even if it is not mandatory for us to provide information to such authorities, we may exercise our discretion to assist them where appropriate.

How We Use Your Information:

We use information held about you for the purposes as stated and in the following ways:

To carry out our obligations arising in connection with any contracts entered into between you and us, or between you and a third party supplier;

To communicate with you regarding your booking or other purchase;

To allow you to participate in interactive features of our service, when you choose to do so.

To notify you about changes to our service;

For improving the quality of our service and the products offered;

For internal research/analysis and customer profiling;
For resolving complaints and dealing with disputes;
For preventing and detecting fraudulent or criminal activity;
For debt collection or credit vetting

Marketing Use:

If you have made an enquiry or purchase, your personal data may be used by us and other A von Brockdorff Services Ltd. companies to contact you by post and/or by electronic means (e-mail or text message) with information and offers relating to products or services similar to those about which you enquired or which you purchased.

We will only do this if you did not opt out of such marketing at the point where we collected your contact details. If you have not made an enquiry or purchase, we will only send you information and offers by email or text message relating to products and services offered by A von Brockdorff Services Ltd. companies if you sign up (opt in) to receive such marketing. We may use your data for marketing purposes of travel and travel related products and services.

We will not pass your contact details to a third party outside of A von Brockdorff Services Ltd. for marketing purposes unless you have expressly agreed that we may do so.

Opting Out Of Marketing Use:

You have the right at any time to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by ticking/un-ticking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by sending an unsubscribe request to : The Data Protection Officer, A von Brockdorff Services Ltd., Level 7, Airways House, High Street, Sliema SLM 1551 or by e-mail to dpo@avbsl.com.

Your right to access any personal data we hold:

The General Data Protection Regulation (GDPR) gives you the right to check that your personal data is being processed lawfully ("subject access right"). Your subject access right can be exercised in accordance with the Regulation. Any subject access request must be made in writing to: The Data Protection Officer, A von Brockdorff Services Ltd., Level 7, Airways House, High Street, Sliema SLM 1551 or by e-mail to dpo@avbsl.com.

Your right to be forgotten:

The General Data Protection Regulation (GDPR) gives you the 'right to be forgotten'. You have the right to erase your personal data at any time, subject it that doesn't compromise the ability to research and any legal requirements can be exercised in accordance with the regulation. Any such request must be made in writing to: The Data Protection Officer, A von Brockdorff Services Ltd., Level 7, Airways House, High Street, Sliema SLM 1551 or by e-mail to dpo@avbsl.com.

Data Security:

The transmission of information via the internet is not completely secure, and although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to this web site; therefore any transmission is at your own risk. Once we have received your information, we will take all reasonable steps to keep your personal data secure and to try to prevent any unauthorised access to it. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.

Links To Third Party Web Sites:

Our site contains links to and from the websites of our principals, suppliers, advertisers and other third parties. If you follow a link to any of these other websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or for these 3rd party websites. Please check these policies before you submit any personal data to these websites.

COOKIES

Our Sites uses cookies to distinguish you from other users. Some of these cookies are essential to make these Sites work properly, to allow you to make your travel booking or other purchases, and to

enable us to fulfil your purchase requests. Other types of cookie help us to provide you with a good experience when you browse our Sites, allow us to improve our Sites or the way we provide our service to customers, or are used to provide you with information or offers from A von Brockdorff Services Ltd. or third parties that may be of interest to you.

Changes to our privacy policy

We reserve the right to update or alter this Privacy Policy from time to time without notice to you.

MALTESE:

Politika dwar il-Privatezza

A von Brockdorff Services Ltd. jifhem u jirispetta l-importanza tal-privatezza tal-passiggier. Dan id dokument jispjega x'dettalji ahna ha nigbru min ghandkom; dak li tiprovdu intom b'mod dirett jew onlajn.

Jekk Joghgobkhom aqraw sew id-dettalji innizzlin hawn taht:

F'isem il- kumpanija taghna A Von Brockdorff Services Ltd, kif ukoll taht l- isem tal- kumpanija ' cruise and Travel Group' , il- kumpanija taghna ghandha kontroll tad- data kemm offlajn u onlajn, (fuq www.avbsl.com, www.vonbrockdorff.com u www.cruiseandtravel.eu) skond l- uzu tar- regolamenti ghall- protezzjoni tad- data (GDPR).

Hija fir- responsabilita' tieghek u li tizgura li tara li l- membri l- ohra huma konxji bil- kontenut ta din il- politika tal- privatezza, u li jkunu f konformita mieghek li jiprovdu d dettalji personali taghhom meta jigu biex jaghmlu prenotazzjoni jew uzu ta servizz iehor f' isimhom

Meta taghmel prenotazzjoni jew uzu ta xi servizz jew tissottometti d- dettalji personali tieghek dirett jew fuq wahda minn dawn is siti msemmija, inti qed taqbel li nitrasferixxu, inzommu jew niprocessaw din id- data kif imsemmi hawn taht. Min- naha tal- kumpanija taghna ser niehdu l- passi kollha mehtiega biex nizguraw li d data tieghek tigi trattata b' mod sigur skont din il- politika tal- privatezza. Se niehdu l- passi kollha ragonevoli mehtiega biex nizguraw li d-data tieghek tigi trattata b'mod sikur skont din il- politika ta' privatezza. F' kaz li inti ma taqbilx kif ahna niprocessaw d- dettalji personali tieghek, ahna ma nistghux naccettaw il- prenotazzjoni li inti tkun ghamilt u min- naha tieghek tista ma taghmilx uzu ta' dawn is siti.

Informazzjoni li tingabar minn ghandek u ghaliex tingabar:

Meta issir il- prenotazzjoni jew tuza' xi servizz iehor minn ghandna, min- naha taghna ahna nigbru certu data personali dwarek u dwar kull persuna ohra li hi inkluzja fil- prenotazzjoni. It- tip ta' informazzjoni li ahna inzommu hija bhal isem, indirizz, indirizz elettroniku, numru tat- telefown, data tat- twelid u preferenzi ta 'l-ivvjaġġar personali. Tigi migbura din it- tip ta' informazzjoni, biex ahna inkunu nistghu naghmlu dak kollu li intom tkunu qed titolbu rigward vjaggar u servizzi ohra. F' kazijiet ohra, ahna nitolbu dettalji personali aktar sensitivi, bhan- numru ta' passaport, numru tal- karta ta' l- identita', informazzjoni dwar il- kundizzjoni medika, dizabilitajiet u rekviziti speċjali, biex inkunu nistghu nikkunsidraw certu htigijiet relatati mal- prenotazzjoni tieghek. Id- data tibqa' tinzamm sakemm tkun titqies mehtiega ghall- operat, ghall-kummerċjalizzazzjoni, ricerka u/jew ghal skop legali. Min- naha taghna, ahna nzommu biss id-data sakemm tkun assolutament neċessarja.

Ahna nistghu nitolbu data personali ohra bhal f' cirkustanzi imsemmija hawn taht:

Meta ahna nitolbu informazzjoni fejn nistghu naghmlu kuntatt ghall- uzu futur tal-kummerċjalizzazzjoni (tista' tkun b' permezz ta' l- imejl, bil- posta jew b' permezz ta' messagg telefoniku) jew jekk inti tiffirma b'mod attiv biex tirċievi ahbarijiet b' imejl minghandna (ghal kemm tista' tibdel fhemtek minn din il- ghazla).

Jekk inti taghmel kuntatt maghna, ahna nistghu inzommu nota ta l- imejl tieghek jew tal- korrispondenza. Jekk taghmel kuntatt bit- telefown, it- telefonata tista' tigi rrekordjata ghall- uzu ta' tahrig jew 'customer-service.'

Nistghu wkoll izommu dettalji ta' kemm il darba tidhol taghmel uzu minn dawn is- siti (inkuz, izda mhux limitata, it- traffiku tad- data u l- post tad data) kemm jekk dan hu mehtieg ghall- iskopijiet tieghek jew mod iehor, u r- rizorsi li taccessa.

Nistghu nigbru informazzjoni ukoll relatata mal- kompjuter tieghek, fejn disponibbli, 'IP Address', 'operating system' u t- tip ta 'browser' ghal skop ta sistema amministrattiva u biex tirraporta informazzjoni aggregata lil min jirrikjalma. Din hija data ta' statistika dwar l- azzjonijiet u l mudelli ta' 'browsing' ta' l- utenti taghna, u ma tindentifika l- ebda individwu.

Trasferament tal informazzjoni tieghek:

Meta wiehed ikun qed jaghmel xi prenotazzjoni ghal vjagg jew xi servizz iehor, ikollna bzon nghaddu d-dettalji mehtiega lil xi terzi persuni, bhal, Linji ta' L ajru, Lukandiera, kumpaniji ta l-assigurazzjoni u kumpaniji ohra. Uħud minn dawn it-terzi persuni jistgħu jkun bbażati barra mill- European Economic Area ("EEA"). L-organizzazzjonijiet li huma bbażati barra l EEA jistgħu ma jkunux soġġetti għall-istess livell ta 'kontrolli fir-rigward tal-protezzjoni tad-data kif jeżistu f EEA.Biex tkun tista tivjagga barra mill-pajjiz, ahna nistghu nkunu mitluba biex nghaddu id-dettalji personali taghkom lil certu dipartimenti tal-gvern jew awtoritajiet ohra f' Malta kif ukoll barra minn Malta. Dipartimenti bhal min hu responsabbli mill-immigrazzjoni, 'border control security' u dawk kontra it-terrorizmu. Anke jekk dan mhux obligatorju, ahna nistghu nuzaw id-dettalji tieghek biex nassistuhom fejn hu xieraq.

Kif nuzaw l- informazzjoni tieghek:

Ahna naghmlu uzu mill- informazzjoni mizmuma dwarek għall- iskop u bil- modi li gejjin:

Biex inwettqu l- obbligi taghna b'konnessjoni ma' kuntratti bejna u bejneq jew bejneq u terzi persuni;

Biex nikkomunikaw mieghek rigward prenotazzjoni ta vjagg u servizzi ohra;

Biex intuk ic- cans li tippartecipa fil funzjonijiet interattivi tas- servizzi taghna ,meta inti taghzel li taghmel ekk;

Biex ninfurmawk f'xi tibdil f'xi servizzi taghna;

Biex intejbu l- kwalita' tas- servizz jew xi prodott offrut;

Biex issir ricerka jew analizi u profil tal- klijent;

Biex insolvu ilmenti jew nittrattaw xi tilwim;

Biex nipprevennu u nitraccaw attivitajiet kriminali jew frodi;

Għall- gbir tad- dejn jew verifika tal- kreditu.

Uzu ta' 'marketing':

Jekk inti ghamilt xi mistoqsija jew xtrajt xi prodott/servizz, id- data personali tieghek tista' tigi uzata minnha jew minn xi kumpanija ohra ta A. Von Brockdorff Services Ltd. biex tigi kkuntatjat bil- posta jew b' mod elettroniku (emejl/messag) b' informazzjoni jew offerti relatati mal- prodott jew servizz simili ta' dak li int tkun xtrajt jew saqsejt dwaru.

Ahna naghmlu dan dejjem jekk inti ma tkunx oggezonajt meta gbarna d-dettalji tieghek. Jekk inti ma tkun ghamilt l- ebda mistoqsija jew xtrajt xi prodott/servizz, ahna nibatulek biss informazzjoni jew offerti b'permezz ta' emejl jew messagg relatata ma prodotti jew servizzi offruti minn kumpaniji f'isem A Von Brockdorff Services Ltd, jekk inti tiregistra biex tircievi dan.

Nistghu nuzaw id- data tieghek ghal skopijiet ta' *marketing* fuq vjaggar u prodotti relatati ma vjaggar biss.

Ahna ma nghaddux dettalji tieghek lil terzi persuni barra minn A von Brockdorff Services Ltd. Għal skopijiet ta' *marketing* sakemm inti ma taccettax li ahna nistghu naghmlu dawn.

Meta ma trid li l- informazzjoni tigi uzata għal skop ta' *Marketing*:

Huwa dritt tieghek li meta trid inti titlobna li twaqqaf li d-dettalji personali tieghek milli jigu processati għall- uzu ta' *marketing*. Tista taghzel jew ma taghzilx certu għazliet fuq il- formali li ahna nuzaw biex nigbru din id- data. Tista taghmel dan billi tibat rikjesta lil: The Data Protection Officer, A von Brockdorff Services Ltd., Level 7, Airways House, High Street, Sliema SLM 1551 jew billi tibghat emajl lil dpo@avbsl.com.

Id- dritt li taccessa kull tip ta data personali li ahna inzommu:

Il- '*General Data Protection Regulation*' (*GDPR*) taghtik id- dritt li tara li d- data personali tieghek qed tigi processata skond il- ligi. ('*subject access right*'). Dan l- access jista' jigi ezercitat skond il- *GDPR*. Kull rikjesta tista' tinkiseb bil- miktub minn: The Data Protection Officer, A von Brockdorff Services Ltd., Level 7, Airways House, High Street, Sliema SLM 1551 jew billi tibghat emajl lil dpo@avbsl.com.

Id- dritt tieghek li jithassru d-dettalji:

Il- GDPR itik id- dritt li d-dettalji tieghek jigu mhassra kompletament. Inti ghandek id- dritt li thassar xi data personali meta u fil-hin li inti tixtieq, suggett li dan ma jikkompromettix il- hila ghar- ricerka u kwalunkwe htiega legali u tista' tigi ezercitata skont ir- regolament. Kwalunkwe riskjesta tista' tigi mibghuta bil miktub lil: The Data Protection Officer, A von Brockdorff Services Ltd., Level 7, Airways House, High Street, Sliema SLM 1551 jew billi tibghat emajl lil dpo@avbsl.com.

Sigurta tad- data:

It- trasmissjoni tad- data permezz ta' l- internet mhix kkompletament sigura, u ghalkemm ahna naghmlu minn kollox biex niprotegu din id- data, ma naghtux garanzija u huwa fir- riskju tieghek. Ladarba ahna nircievu l- informazzjoni tieghek, min- naha taghna niehdu kull mizura biex inzommu id- data personali sigura' u niprevjenu access mhux awtorizzati. Kull informazzjoni li tipprovdu lna tigi mizmuma fis- *servers* siguri taghna. Kull transazzjoni ta' pagamenti tigi *encrypted* bis- sistema SSL, fejn tigi moghti (jew taghzel) *password* li tippermettilek li taccessa partijiet mis- siti eletroniki taghna. Huwa responsabilta' tieghek li zzomm din il- *password* kunfidenzjali. Nitolbuk li ma taqsam dan il- *password* ma' hadd.

Links ma siti ta' terzi persuni:

Is- Siti taghna jinkludu *links* ghal u minghand siti tal principali taghna, *suppliers*, min jirreklamalna u terzi persuni. Jekk taccessaw wahda minn dawn il- *links* ftakru li dawn ghandhom il- politika taghhom ta privatezza u ahna ma ahniex responsabbli ghal din il politika u ghal siti ta' terzi persuni. Jekk joghgbok dejjem iccekja din il-politika qabel tissotometti xi dettalji personali.

Cookies:

Is- siti taghna juzaw tipi ta' *cookies* li jiddistingwixxuk minn haddiehor. Uhud minn dawn il- *cookies* jghinu lis-siti taghna biex jahdmu ahjar kif ukoll ihalluk taghmel prenotazzjonijiet jew tixtri servizz jew prodotti ahjar u kif ukoll jippermettulna li nissodisfaw ir- rikwesti tieghek. Tipi ohrajn ta' *cookies* jghinuna biex niprovdlek esperjenza tajba meta taghmel uzu mis- siti taghna, jghinuna ukoll biex niprovdu servizz ahjar lill- konsumaturi u ntejbu dawn l- istess siti. Dawn il- *cookies* jintuzaw biex ahna niprovdu informazzjoni u offerti minghand A von Brockdorff Services Ltd jew terzi li jistghu jkunu ta interess ghalik.

Tibdil fil- politika tal- privatezza taghna:

Ahna nirriservaw id- dritt li naggornaw jew nibdlu din il- politika tal- privatezza minn zmien ghall- zmien minghajr ma navzawk.