

Grand Harbour Marina Plc

Privacy Policy

Version 1.1, last updated: 21st May 2018

We can make changes to this Privacy Policy from time to time. We will identify the changes we have made on this page. In circumstances where a change will materially change the way in which we collect or use your personal information or data, we will send a notice of this change to you and you shall have a right to object to any such update and/or amendment or withdraw your consent.

1. Controller Details

The controller of the personal data is Grand Harbour Marina Plc, a limited liability company incorporated in Malta, bearing company registration number C 26891 and having its registered office at Vittoriosa Wharf, Vittoriosa, BRG 1721, Malta, hereinafter referred to as "**COMPANY**".

The Company may be contacted at the abovementioned address or by email at info@ghm.com.mt.

The Company's Data Protection Officer is Ms. Jacqueline Mangion who may be contacted by email at info@ghm.com.mt and by telephone at (00356)21800700.

2. Personal Data

The term "personal data" refers to all personally identifiable information and includes all the information provided to the Company by you and all information which may arise that can be identified with an individual personally, including information of third party's provided to the Company.

3. Purposes of Processing

The purposes of processing for which the personal data are intended are marketing purposes.

The Company may, from time to time, like to contact you to provide you with information about the Company's services as well as news & events that may be held by the Company, and other information that relates to the service offering provided by the Company ("**Marketing**").

4. Marketing

Marketing will be carried out exclusively through the circulation of e-mails.

You can change your mind and may withdraw consent to the processing of personal data for Marketing purposes at any time by sending us an email on info@ghm.com.mt.

Withdrawal of consent for Marketing does not affect the lawfulness of the processing based on such consent prior to its withdrawal.

5. Legal Basis

The Company's legal basis for processing personal data for Marketing purposes that have been provided by you is your explicit consent with regard to the processing of such personal data.

6. Recipients

The recipients of the personal data are:

- a. selected individuals within The Company;
- b. The Company's intra-group companies and affiliates; and
- c. agents and third parties that provide services to the Company.

The Company's recipients of personal data are located within the EU.

7. Processing Requirement

The Company will process personal data that you have given us for the purpose of Marketing and follow up as well as for of improving our services.

The processing of your personal data is not a statutory requirement, however, is a requirement for the purposes of enabling us to circulate e-mails to you of a Marketing nature. Failure to provide your personal data impedes us from being in a position to circulate such Marketing e-mails to you.

8. Automated Decision-Making and Profiling

Your personal data will not be used for any automated decision-making or profiling.

9. Data Retention

Your personal data will be used for Marketing purposes until such time as your consent to receive Marketing material is withdrawn.

10. Rights

For as long as the Company holds personal data about an individual, that individual may (where applicable):

- a. request access to and rectification of personal data where incomplete or inaccurate;
- b. request erasure of his personal data;
- c. object to the processing of his personal data;
- d. request provision of his personal data in a structured, commonly used and machine-readable format; and
- e. request transmission to himself or another controller indicated by the individual.

11. Complaints

The Company and/or its Data Protection Officer may be contacted on complaints regarding the processing of personal data at the details indicated above. A right to lodge a complaint with the Office of the Information and Data Protection Commissioner in Malta (www.idpc.gov.mt) is also in place.