



# Privacy Policy

Last updated: 01.062023

## Introduction

The following information serves to clarify the kind, scope and purpose of the collection and use of personal data and informs you about your rights regarding the collection and processing of your personal data. We provide this information in accordance with Articles 13 and 14 of the General Data Protection Regulation (GDPR). Controller of all processing activities is:

MarineHub Sp. z o.o.  
ul. Skromna 5/5  
20-704 Lublin  
Poland  
(hereinafter referred to as "MarineHub")

We reserve the right to change this Privacy Policy at any time. If we make any material changes to our Privacy Policy, we will post a new policy on the Website and update the "last updated" date set forth above.

## 1. What Information Do We Collect and how We use it?

We may use the information that we collect from you when you register to use the Website, purchase services from the Website, surf the Website, or use certain features of the Website in the following ways:

### 1.1. Information That Is Necessary For The Use Of Our Services.

We ask for and collect the following personal information. This information is either necessary for the adequate performance of the contract between you and us (Article 6 para 1 lit. b GDPR) and/or to allow us to comply with our legal obligations (Article 6 para 1 lit. c GDPR), such as our legal obligations according to Article 96 para 3 Telecommunications Act (Telekommunikationsgesetz) as well as for the purpose of providing information to law enforcement authorities and courts in case of necessity. Without it, we may not be able to provide you with all the requested services. Furthermore, we process your personal data for our legitimate interest in being able to provide and improve the functionalities of our services, promote our products and prevent spam and fraud (Article 6 para 1 lit. f GDPR).

- Account Information When you sign up for a MarineHub Account, we require certain information such as your first name, last name, email address, and date of birth.
- Boat information. Before you can book a berth we require information about your boat such as boat registration number (CIN/HIN), boat name, type, manufacturer, length, width, draft, year of manufacture, hull number, country of origin etc.
- Profile Information. To use certain features of the MarineHub application (such as berth booking), we may ask you to provide additional information, which may include your address and phone number.



- Marina information. If you are a marina owner, we will collect information about your marina such as its location, services around, pictures, berth availability information, prices, amenities, website URL and other relevant information.
- Identity Verification Information. To help create and maintain a trusted environment, we may collect identity verification information (such as images of your government-issued ID, passport, national ID card, or driving license, as permitted by applicable laws) or other authentication information.
- Payment Information. To use certain features of the MarineHub application (such as booking a berth or managing a marina's bookings), we may require you to provide certain financial information (like your bank account or credit card information) in order to facilitate the processing of payments.
- Messaging. When you communicate with MarineHub or use the MarineHub application to communicate with other Members, we collect information about your communication and any information you choose to provide.

## **1.2. Information You Can Choose To Give Us.**

You may choose to provide us with additional personal information in order to obtain a better user experience when using our application. We process your personal data for our legitimate interest in being able to provide and improve the functionalities of our services, promote our products and prevent spam and fraud (Article 6 para 1 lit. f GDPR).

- Any Additional Profile Information. You may choose to provide additional information as part of your MarineHub profile such as gender, profile picture, preferred language(s), city of origin.
- Address Book Contact Information. You may choose to import your address book contacts or enter your contacts' information manually to access certain features of the MarineHub application, like inviting them to use MarineHub.
- Other Information. You may otherwise choose to provide us information when you fill in a form, update or add information to your Account, respond to surveys, communicate with our customer support, share your experience with us, or use other features of the MarineHub application.

## **1.3. Information that is necessary for the use of the payment service.**

Our payments provider needs to collect the following information necessary for the adequate performance of the contract with you and to comply with applicable law (such as anti-money laundering regulations). Without it, you will not be able to use payment service:

- Payment Information. When you use the payment service, the payment provider requires certain financial information (like your bank account or credit card information) in order to process payments and comply with applicable law
- Identity Verification and Other Information. If you are a Marina, the Payments Data Controller may require information about your business (such as company name, VAT-ID, address, country, etc), to provide the payment service to you, and to comply with applicable law.



Please note, that the respective payment service provider is Controller with regard to the data processing carried out for the use of the payment service.

#### **1.4. Information We Automatically Collect When You Use Our Services.**

When you use our services, we automatically collect personal information about how you use them. This information is necessary for the adequate performance of the contract between you and us (Article 6 para 1 lit. b GDPR), and/or to enable us to comply with legal obligations (Article 6 para 1 lit. c GDPR) and/or given our legitimate interest in being able to provide and improve the functionalities of our services, promote our products and prevent spam and fraud (Article 6 para 1 lit. f GDPR). Certain information may also be processed upon your valid consent (Article 6 para 1 lit a GDPR). You can withdraw this consent at any time to MarineHub as Controller.

- **Geo-location Information.** When you use certain features of the MarineHub application, we may collect information about your precise or approximate location as determined through data such as your IP address or mobile device's GPS to offer you an improved user experience upon your valid consent. Most mobile devices allow you to control or disable the use of location services for applications in the device's settings menu. MarineHub may also collect this information even when you are not using the app if this connection is enabled through your settings or device permissions.
- **Usage Information.** We collect information about your interactions with the MarineHub application such as the pages or content you view, your searches for Marinas, bookings you have made, and other actions on the MarineHub application based on our legitimate interest.
- **Log Data and Device Information.** We automatically collect log data and device information when you access and use the MarineHub application, even if you have not created a MarineHub Account or logged in based on our legitimate interest. That information includes, among other things: details about how you've used the MarineHub application (including if you clicked on links to third-party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you've viewed or engaged with before or after using the MarineHub application.
- **Payment Transaction Information.** We collect information related to your payment transactions through the MarineHub application, including the payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, PayPal email address, IBAN information, your address and other related transaction details. This information is necessary for the adequate performance of the contract between you and payment service and to allow the provision of the payments.

#### **1.5. Cookies**

Our payments provider needs to collect the following information necessary for the adequate performance of the contract with you and to comply with applicable law (such as anti-money laundering regulations). Without it, you will not be able to use payment service:



- **Cookies and Similar Technologies.** Cookies are small text files that are temporarily stored on your terminal device with the help of the browser and which your browser stores. They do not cause any damage, but make the use of the website more user-friendly. Some Cookies remain stored on your end device until you delete them. They enable us to recognize your browser on your next visit. You can prevent the setting of Cookies by adjusting the settings on your browser (see your browser help menu for how to do this). We use cookies and other similar technologies (i) that are essential for the operation of the website when you use our platform, use our mobile app, or engage with our online ads or email communications based on our legitimate interest (Article 6 para 1 lit. f GDPR) and (ii) that are not essential for the operation of the website based on your valid consent (Article 6 para 1 lit. a GDPR). You can withdraw this consent at any time to MarineHub as Controller. We may collect certain information by automated means using technologies such as cookies, web beacons, pixels, browser analysis tools, server logs, and mobile identifiers. In many cases, the information we collect using cookies and other tools is only used in a non-identifiable way without reference to personal information. For example, we may use the information we collect to better understand website traffic patterns and to optimize our website experience. In some cases, we associate the information we collect using cookies and other technology with your personal information. Our business partners may also use these tracking technologies on the MarineHub application or engage others to track your behavior on our behalf. If you disable cookies, you may not have access to many features that streamline your experience on our Website, and some of our services may not function properly.
- **Google Analytics.** Our website uses Google Analytics (Google LLC, Mountain View, California, United States) on the basis of your valid consent (Article 6 para 1 lit. a GDPR). We use Google Analytics exclusively with the code "gat.\_anonymizeIp()" to ensure anonymized collection of IP addresses (so-called IP masking). The information generated by the cookie about your use of this website will be transmitted to and stored by Google on servers in the United States. In the event that IP anonymization is activated on this website, however, your IP address will be shortened beforehand by Google within member states of the European Union or in other contracting states to the Agreement on the EEA. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be connected with other Google data. You may refuse the use of cookies by selecting the appropriate settings on your browser. Please note that in this case you may not be able to use the full functionality of this website. You can also prevent the collection by Google Analytics by clicking on the following link and following the instructions there to set an opt-out cookie that will prevent the future collection of your data when visiting this website: <http://tools.google.com/dlpage/gaoptout>. For more information about Google's terms of use and privacy policy, please visit <https://marketingplatform.google.com/about/analytics/terms/de/> or <https://policies.google.com/?hl=de&gl=de>.



- Hotjar. We use Hotjar, a web analytics service provided by Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe ("Hotjar") to analyze how our Website is used based your valid consent (Article 6 para 1 lit. a GDPR).Hotjar. We use Hotjar, a web analytics service provided by Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe ("Hotjar") to analyze how our Website is used based your valid consent (Article 6 para 1 lit. a GDPR).Hotjar allows us to monitor your usage behavior on our Website, such as logging and evaluating your mouse movements or mouse clicks. In addition, information about your operating system, your internet browser, incoming or outgoing links, the geographical origin of your access, and the type and resolution of the device you are using are evaluated by Hotjar and processed for statistical purposes. Hotjar can also obtain direct feedback from you.Hotjar offers further information about its data protection practices at <https://www.hotjar.com/privacy> In addition, you have the option of terminating the analysis of your usage behavior by opting out. By confirming the link <https://www.hotjar.com/opt-out> a cookie is stored on your device via your browser to prevent any further analysis. Please note, however, that you must click the above link again if you delete the cookies stored on your end device.
- Pixels and SDKs. Third parties, including Facebook, may use cookies, web beacons, and other storage technologies to collect or receive information from our websites and elsewhere on the internet and use that information to provide measurement services and target ads. For apps, that third parties, including Facebook, may collect or receive information from your app and other apps and use that information to provide measurement services and targeted ads.
- Do Not Track Signals. While you may disable the usage of cookies through your browser settings, the MarineHub application currently does not respond to a "Do Not Track" signal in the HTTP header from your browser or mobile application.

## 1.6. Third Party Information

MarineHub may collect information, including personal information that others provide about you when they use the MarineHub application, or obtain information from other sources and combine that with information we collect through the MarineHub application. We do not control, supervise or respond to how the third parties providing your information process your Personal Information, and any information request regarding the disclosure of your personal information to us should be directed to such third parties.

- Third-Party Services. If you link, connect, or login to your MarineHub Account with a third-party service (e.g. Google, Facebook), the third-party service may send us information such as your registration, friends list, and profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- Referrals. If you are invited to MarineHub, the person who invited you may submit personal information about you such as your email address or other contact information.
- Other Sources. To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or information to help detect fraud and safety issues, from third-party service providers and/or partners,



and combine it with information we have about you. For example, we may receive background check results (with your consent where required) or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the MarineHub application through partnerships, or about your experiences and interactions from our partner ad networks.

## 2. Transfer of your data

We will transfer your personal data if we are legally obligated to do so to the following authorities and institutions:

- Courts and authorities;
- Legal representatives or lawyers and third parties, assisting in legal services.

Furthermore, service providers (processors) will receive your personal data from us in order to render their respective services (e.g. IT-service providers). All service providers are contractually obligated to keep your personal data confidential and may use your personal data only on our behalf and in line with our instructions. We will make sure that your personal data is transferred on the basis of Standard Contractual Clauses (as of today: 2010/87/EC and/or 2004/915/EC), if the above-mentioned recipients of your personal data are seated outside European Economic Area (EEA) and if the Commission has not decided that there is an adequate level of data protection in place in the country where the recipient of your personal data is seated or otherwise in accordance with Articles 46, 47 or 49 GDPR.

## 3. Duration of processing / storage period

We will process your personal data as long as the processing is necessary. Your personal data will be stored for as long as your account exists and will be anonymized or erased automatically as soon as the processing is no longer necessary. We retain your personal data necessary for the performance of our services according to mandatory record retention and documentation duties (e.g. according to the Austrian Commercial Code (Unternehmensgesetzbuch) or the Federal Fiscal Code (Bundesabgabenordnung)). Furthermore we comply with the legal periods of limitation, e.g. according to the Code of Civil Law. These periods of limitation can last up to 30 years in certain cases.

## 4. Safeguarding Your Personal Information

We follow generally accepted industry security standards to safeguard and help prevent unauthorized access, maintain data security and correctly use personal identification and financial information. However, no commercial method of information transfer over the Internet or electronic data storage is known to be 100% secure. As a result, we cannot guarantee the absolute security of such information during its transmission or its storage in our systems, and you should always take care to safeguard your personal information.



## 5. What Should You Consider Before Clicking on Third-Party Links?

This Privacy Policy applies solely to information collected by our Website. In an attempt to provide you with increased value, we may include third party links on our Website. These linked websites have separate and independent privacy policies. We, therefore, have no responsibility or liability for the content and activities of these linked websites. Nonetheless, we seek to protect the integrity of our Website and welcome any feedback about these linked websites (including if a specific link does not work).

## 6. What are your rights in connection with your personal data?

- Right to information. Provided that we process your personal data, you have the right to information about the purposes of processing, the categories of personal data, the recipients of your personal data, the duration of storage, your rights, the origin of your personal data and the existence of an automated decision-making.
- Rectification and erasure of data. If we process inaccurate or incomplete personal data you have the right to rectification of such data. You may also request the erasure of your personal data if your data is processed unlawfully, subject to legal obligations preventing the erasure of your personal data.
- Limitation of processing. You may request to limit the processing of your personal data in certain cases.
- Data portability. You have the right to receive the personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You have the right to direct transmission of those data to another controller as far as this is technically feasible.
- Right to object. You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you. If you object to processing of your personal data, we shall cease to process your personal data unless our legitimate interests to processing your personal data override your interests. In the event of objection to processing for advertising purposes, we will in any case cease processing for this purpose.
- Complaint. You have the right to lodge a complaint with the supervisory authority, if you believe that the processing of your data violates data protection law or your rights to protection of your personal data have been infringed. In Austria, this is the Austrian Personal *Data Protection* (Urząd Ochrony Danych Osobowych) (<https://uodo.gov.pl>).
- Contact. To exercise your rights in connection with your personal data processed by us, please contact

MarineHub Sp. z o.o.  
ul. Skromna 5/5  
20-704 Lublin  
Poland  
VAT ID 9662142413

[contact@marinehub.eu](mailto:contact@marinehub.eu)

- Definitions. Definitions of the terms used (e.g. "personal data" or "processing") can be found in Article 4 GDPR.