

# VOYAGER WORLDWIDE PRIVACY POLICY

(last updated July 2020 )

## 1. Introduction

Voyager Worldwide is committed to protecting the personal data that we collect from you from time to time in order to provide goods and services to you. This policy applies to personal data that you supply to us via phone, email, letter or via our websites.

We are committed to deal with your personal data in accordance with all applicable laws concerning personal data, including the General Data Protection Regulation (EU) 2016/679.

This policy explains the following:

- who we are;
- the legal bases we rely on to process your data;
- what personal data we may collect about you;
- how we will use the personal data we collect about you;
- when we may use your details to contact you;
- contacting you for marketing purposes;
- whether we will disclose your details to anyone else;
- how we protect your personal data;
- where we process your personal data;
- how long we keep your personal data for;
- your rights in the personal data that we hold:
- making a complaint; and
- the use of cookies on our websites and how you can reject cookies.

## 2. Who are we?

References to Voyager Worldwide in this policy means the companies trading under the Voyager Worldwide brand. Please see the Appendix at the end of this Policy for a full list of companies and their contact details. For ease we will refer to "Voyager Worldwide", "we" or "Us" throughout this Privacy Policy.

## 3. **Explaining the legal bases we rely on**

Data protection law sets out a number of different circumstances in which a company may process personal data including:

- Consent

In specific circumstances we can process your data with your consent.

*For example, when you tick a box to receive our email newsletters.*

- Contractual obligations

In certain circumstances we need your personal data to comply with our contractual obligations.

*For example, if you order a chart from us we need a contact name for queries, invoicing and delivery.*

- Legal compliance

If the law requires us to, we may need to process your data.

*For example, we can pass on details of individuals involved in fraud or other criminal activity affecting us to law enforcement.*

- Legitimate interest

In specific situations we require your data to pursue our legitimate interests in a way which might reasonably be expected as running our business and which does not materially impact your rights, freedom or interests.

*For example, we may contact you to participate in a survey (on a voluntary basis) about our products and services to see how we can improve our service.*

#### 4. **What personal data will we collect about you?**

When you purchase our good or services, make any enquiry or sign up to receive our newsletter we will receive personal data about you. This will consist of information such as your name, email address, postal address, credit card details, telephone or mobile number depending on the activity.

We also use cookies (see further information below for details) and collect IP addresses (an IP address is a number that can uniquely identify a specific computer or other network device on the internet) and other information about devices from visitors to our website.

5. **How will we use the personal data we collect about you?**

We may use your personal data in a number of ways including the following:

- to provide our products and services and online content, to provide you with information about them and to deal with your requests and enquiries. We need to use your personal data in these circumstances to process your orders and comply with our legal obligations
- for "service administration purposes", which means that we may contact you for reasons related to the product, service or online content you have signed up for, as set out in section 6 below (e.g. to provide you with password reminders or to notify you that a particular service or online content has been suspended for maintenance). We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.

6. **When will you contact me?**

We may contact you:

- in relation to any products, services or online content you have purchased or signed up to in order to ensure that we can deliver the products, services or online content to you. We need to use your personal data in these circumstances to process your orders and comply with our legal obligations
- in relation to any correspondence we receive from you or any comment or complaint you make about us. We need to use your personal data in these circumstances to deal with your comment or complaint and comply with our legal obligations.
- to invite you to participate in surveys about our products and services (or to obtain feedback on the service we have provided (participation is always voluntary and you can opt out of hearing from us in these circumstances if you wish to do so). We do this on the basis of our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience. and
- for marketing purposes (see section 7 below). We do this with your consent or on the basis of our legitimate interests.

7. **Will I be contacted for marketing purposes?**

We may send you emails and other communications relating to our products and services from time to time. You may opt out of these emails at any time by clicking on the "unsubscribe" link in the emails.

8. **Will you share my personal data with anyone else?**

Generally we will only use your data within our organisation. However, sometimes we may be required by law, upon a valid request, to disclose it to a government body or law enforcement agency. We would assess any request made on a case by case basis in accordance with the law.

We may also provide your data to credit card reference agencies, credit card clearing agencies and fraud prevention agencies in connection with processing any payments.

We also use third parties such as partners and contractors to provide certain goods or services that you may be purchasing and these third parties will need access to your personal data to fulfil our contract with you.

We may also provide your data to other trusted third parties such as delivery companies.

9. **How do we protect your personal data?**

We treat your data with the utmost care and take all reasonable steps to protect its security.

10. **Where will you process my personal data?**

In relation to personal data belonging to our European customers, we sometimes we need to share your this outside of the EEA (for example by sharing it with members of our organisation who are outside of the EEA). The EEA means all countries within the EU as well as Norway, Iceland and Liechtenstein.

We may do this to fulfil orders or answer queries.

If we do this we have procedures in place to ensure that your personal data receives the same protection as if it were being processed within the EU.

**How long do we keep your personal data?**

We will hold your personal data only for as long as is necessary for us to fulfil the process for which it was provided. At the end of that period the data will be deleted. .

## 12. **What rights do I have in relation to my personal data processed by you?**

You may have the right to request:

- access to the personal data we hold about you, free of charge, in most cases
- the correction of incorrect, out of date or incomplete personal data;
- that we stop using your personal data for direct marketing (either through specific channels of marketing or all marketing channels); and
- that we stop any consent-based processing of your personal data after you withdraw that consent.

Where that right exists, if you wish to contact us to exercise any of the above rights please use the contact details in the Appendix. Please note these rights will only apply in so far as we are required to do so by the applicable law.

## 13. **Making a Complaint**

If you feel that your personal data has not been handled correctly or you are unhappy with any of the responses that you receive from us regarding the use of your personal data, you may have the right to make a complaint to the regulator in your country of residence. In the UK this is the Information Commissioner's Office. You can contact them as follows:

Tel: 0303 123 1113

[www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

## 14. **Cookies**

Our site uses cookies to store information on your device used to access the sites. A cookie is a small amount of data, which often includes a unique identifier that is sent to your device from a website's computer and is stored on your device's hard drive. Some of these cookies are essential to make our website work and others help us to improve by giving us some insight into how the site is being used.

These cookies are set when you submit a form, login or interact with the site by doing something that goes beyond clicking some simple links. We also use some non-essential cookies to anonymously track visitors or enhance your experience of this site.

If you are not happy with this, we will not set these cookies but some nice features on the site may be unavailable. To control third party cookies, you can also adjust your browser settings.

#### 15. **Changes to the Privacy Policy**

It is likely we may need to update this Privacy Policy from time to time. Please come back and check this Privacy Policy regularly as continued submission of personal data after a change has been made is your acceptance of the change. We will indicate at the beginning of this Policy the date of any change.

#### 16. **Governing Law**

This Privacy Policy is governed by the laws of England.

#### **Appendix**

Contact person for all companies:

Legal Counsel

Lesley.Chin@voyagerww.com

#### **Global Navigation Solutions Limited trading as Voyager Worldwide of:**

17 Elm Road

North Shields

Tyne & Wear

NE29 8SE

UK

#### **TG Technologies Limited of:**

1st Floor (Front) Ocean Spirit House West

31-33 Waterloo Quay

Aberdeen

AB11 5BS

UK

**Global Navigation Solutions GmbH trading as Voyager Worldwide of:**

Herrengraben 31

20459 Hamburg

Germany

**Global Navigation Solutions SA trading as Voyager Worldwide of:**

115 D. Moutsopoulou

18541 Piraeus

Greece

**Global Navigation Solutions PTE Limited and SAFE NAVIGATION PTE. LTD both trading as Voyager Worldwide of:**

2 Boon Leat Terrace

#05-02/03/04 Harbourside Building 2

119844

Singapore

**SAFE NAVIGATION, INC. trading as Voyager Worldwide of:**

225 E. 6th Street

Long Beach

CA 90802

USA

**SAFE NAVIGATION (HK) LTD. Trading as Voyager Worldwide of:**

1/F Hong Kong Jewellery Bldg.

178-180 Queen's Road Central. HKSAR

**Chart Group Yokohama trading as Voyager Worldwide of:**

8F JPT Motomachi Bldg 273 Yamashita-cho

Naka-ku

Yokohama 231-0023 Japan

**Chart Group Kobe trading as Voyager Worldwide of:**

5F Meikai Bldg

32 Akashimachi

Chuo-ku

Kobe 650-0037 Japan