

Privacy policy

(According to the new EU GDPR effective on 25th May 2018)

1. Introduction

Verlio Group (Transportes y Consignaciones Marítimas Baleares, S.A.U.) is committed to maintaining your privacy as follows:

- 1.1 This privacy policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. In other words, where we determine the purposes and means of the processing of that personal data.
- 1.2 When we refer to "personal data" we mean 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, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the operation of the Website, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 This policy only applies to the collection of your personal data by us and the use of that personal data by us and those whom we authorise. It does not cover third party websites to which we provide links. They may have their own privacy policies and/or terms and conditions of use. We encourage you to review those policies if available when you visit those sites. We therefore have no responsibility or liability for the content and activities of these linked sites.
- 1.5 By accessing and continuing to use the Website (as applicable), you accept the terms of this policy. If you do not agree with any of our policy then you should not use the Website.

2. How we use your personal data

We may collect and process the following data about you:

- 2.1 Transaction data. Information relating to transactions, including purchases of goods and services that you enter into with us. It may include your contact details, your payment method details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods or services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests.
- 2.2 Notification data. Information that you provide by filling in forms on our Website. This includes information provided at the time of subscribing to our mailing list or requesting

further goods or services. The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent or the performance of a contract between you and Verlio Group (Transportes y Consignaciones Marítimas Baleares, S.A.U.) and/or taking steps, at your request, to enter into such a contract.

- 2.3 Correspondence data. If you contact us, we may keep a record of that correspondence. It may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with you.
- 2.4 Details of your visits to our Website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website.
- 2.5 We may also ask you to complete surveys / feedback forms that we use for research purposes, although you do not have to respond to them.
- 2.6 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 2.7 In addition to the specific purposes for which we may process your personal data set out in this section, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject.

3. What information do we share with others?

- 3.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 3.2 We may disclose your personal data to our employees, suppliers or subcontractors insofar as reasonably necessary for to administer the goods and services provided to you by us now or in the future. We require any company with which we may share personal data to protect that data in a manner consistent with this policy and to limit the use of such personal data to the performance of services for Verlio Group (Transportes y Consignaciones Marítimas Baleares, S.A.U.)

3.3 We do not sell or otherwise provide Personal Information to other companies for the marketing of their own products or services.

3.4 Financial transactions. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding and dealing with complaints and queries relating to such payments and refunds.

3.5 In addition, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject; to the police, regulatory bodies or legal advisers in connection with any alleged criminal offence or suspected breach of our terms and conditions relating to you or otherwise where required by law.

4. Where do we store your personal data?

4.1 The data that we collect from you will be stored by us on servers in the European Economic Area ("EEA").

5. Retaining and deleting personal data

This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.1 We will retain your information for as long as your information is needed to provide you goods and services and shall not be kept for longer than is necessary for that purpose or those purposes.

5.2 Notwithstanding the previous point, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject.

6. Amendments

6.1 We may reserves the right to amend and update this Privacy Policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We may notify you of significant changes to this policy by email, prior to the changes becoming effectives.

7. Your rights

We have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Your principal rights under data protection law are:

7.1 Right to access. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal

data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.

7.2 Right to rectification. You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.3 Right to erasure. You have the right to the erasure of your personal data without undue delay in the following circumstances:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- You withdraw consent to consent-based processing;
- You object to the processing.
- The processing is for direct marketing purposes and the personal data have been unlawfully processed.

However, there are exclusions of the right to erasure that includes where processing is necessary for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

7.4 Right to restrict processing you have the right to restrict the processing of your personal data in the following circumstances:

- You contest the accuracy of the personal data.
- Processing is unlawful but you oppose erasure.
- We no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims
- You have objected to processing, pending the verification of that objection.

Once processing has been restricted, we may continue storing your personal data. Although, we will only otherwise process it with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

7.5 Right to object to processing. You have the right to object to our processing of your personal data in the following circumstances:

- The performance of a task carried out in the public interest or in the exercise of any official authority vested in us.
- The purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal data unless we can demonstrate legitimate interest for the processing or the processing is for the establishment, exercise or defence of legal claims.

7.6 Right to data portability. You have the right to receive personal data you have provided to us in a structured, commonly used and machine readable format. It also gives you the right

to request that Verlio Group (Transportes y Consignaciones Marítimas Baleares, S.A.U.) transmits this data directly to another controller.

7.7 Right to complain to a supervisory authority. You have the right to lodge a complaint with a supervisory authority responsible for data protection, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the law regulation.

7.8 Right to withdraw consent. You have the right to revoke your consent at any time, but that this will not affect the lawfulness of processing based on consent before its withdrawal.

8. About cookies

8.1 When we refer to a "cookie" we mean a small data file that is stored by your web browser on your computer or handheld device. Cookies contain a small amount of information that is transferred to your computer's hard drive or storage media on the device used to access the Website. This information is then sent back to the server each time the browser requests a page from the server, helping us to improve our Website.

8.2 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

8.3 We use cookies for the following purposes:

Google Analytics: Stores cookies to be able to compile statistics on traffic and volume of visits to this website. By using this website you are consenting to the processing of information about you by Google. Therefore, the exercise of any right in this regard must do so by communicating directly with Google.

9. How to manage cookies

9.1 Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) CHROME - <https://support.google.com/chrome/answer/95647?hl=en>
- (b) FIREFOX - <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- (c) OPERA <http://www.opera.com/help/tutorials/security/cookies/>
- (d) SAFARI - <https://support.apple.com/kb/PH21411>
- (e) MICROSOFT INTERNET EXPLORER - <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

- (f) MICROSOFT EDGE - <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

9.2 Blocking all cookies will have a negative impact upon the usability of many websites.

10. Contact details

If you have any questions or concerns about our Privacy Policy or data processing or if you would like to make a complaint about a possible breach of privacy laws, please contact us by:

- Email: info@verlio.es

- Postal mail:

Verlio Group (Transportes y Consignaciones Marítimas Baleares, S.A.U.)

Rafaletas, 1 (Edificio Torreomar)

07015-Palma de Mallorca (Balearic Islands)

Spain.