

STAR CLUB LOYALTY PROGRAMME – PRIVACY NOTICE

Finnlines is committed to protecting your personal data. This Privacy Notice applies to our Star Club Loyalty Programme (“**Star Club**”). This Notice explains how we collect and use your personal data and what rights you have under applicable data protection laws, including the EU General Data Protection Regulation (“**GDPR**”). This Privacy Notice may be updated from time to time.

You can find the terms and conditions of the Star Club [here](#).

1. Contact Information

Controller:

Finnlines Plc

Business ID: FI02011539

Address: Komentosilta 1, 00980 Helsinki, Finland

Contact person:

Päivi Toivanen

Email: paivi.toivanen@finnlines.com

Data Protection Officer:

Jutta Seppänen

Email: dataprivacyofficer@finnlines.com

If you have questions about how we process your personal data or would like to exercise your rights, please contact us by email at: paivi.toivanen@finnlines.com or dataprivacyofficer@finnlines.com.

2. Purposes for Processing Personal Data

We process personal data of Star Club members for the following purposes:

(1) Star Club Membership and Service Provision

We process your personal data when you are or become a member of our Star Club Loyalty Programme. The processing is necessary so we can provide you services based on the agreement between you and Finnlines. This includes maintaining and managing the membership as well as offering members discounts and benefits of the Star Club Loyalty Programme (GDPR Art. 6(1)(b)).

For this purpose, we process the following personal data:

- Identification data (name, gender, date of birth, nationality, and language);
- Contact details (address, email address, and phone number);
- Membership data (Star Club ID, interests, marketing consents and prohibitions); and
- Booking and travel data (date of booking and departure, route, vehicle type, booking channel, travel history and information about co-passengers (age, gender, nationality)).

This personal data is needed for the Star Club membership. Without it, we may not be able to provide services or make an agreement with you.

We also process your personal data when you use your Star Club ID to use our services or shop onboard our vessels and when you check-in by using the Finnlines Application (“**Finnlines App**”).

This data is used to design, operate and develop the Star Club Loyalty Programme, as well as to improve our business, customer service and customer relationships. It also helps us develop the products and services available to Star Club members on board our vessels.

We use personal data to provide customer support, communicate with Star Club members, and carry out statistics, analyses and surveys to better understand our customers' needs. In addition, we process personal data to prevent fraud and to ensure the security of our services and systems. Where necessary, personal data may be processed in connection with legal claims or complaints.

This processing of personal data is based on our legitimate interest to improve our services and business activities, offer customer service and process customer feedback. It is also necessary to manage customer relationships and to make and defend legal claims (Art. 6(1)(f) of the GDPR).

For these purposes, we may process the personal data described above, as well as:

- Purchase data (such as purchases onboard the vessel) when this information is voluntarily given by you by using Star Club ID when making purchases;
- Service data (such as requested specified and utilised services on the vessel) when this information is voluntarily given by you by using Star Club ID when requesting or purchasing services;
- Technical data (IP address, time of registration, system-related identifiers); and
- Customer feedback, when this information is voluntarily given.

You have a right to object to the processing of this personal data, but the objection may prevent the use of Finnlines App and other services or benefits.

(2) Finnlines Application

The Finnlines App includes content that is available only to the members of the Star Club Loyalty Programme. We process your personal data when you use Finnlines App to access the Star Club content and when you check-in through the application by using your Star Club ID. We process personal data also when informing you of any disruption or interruption affecting the use of the App. The processing is necessary so we can provide you with the full features and benefits of Finnlines App (GDPR Art. 6(1)(b)).

For this purpose, we process identification data (such as name and Star Club ID), email address and preferred language. This personal data is needed so you can sign in to Finnlines App by using Star Club ID and use the full features and benefits of Finnlines App.

In addition, we process your personal data when you use Finnlines App, including IP address, device and software used, time of login, and other similar information relating to operating system and computer environment. The data is used to analyse the use of Finnlines App so that we can develop, improve and protect the application. This processing is needed for our legitimate interest to make sure Finnlines App works properly and to improve and protect the application (GDPR 6(1)(f)).

(3) Marketing

We process your personal data when you use your Star Club ID to book or purchase our services or shop onboard. We use this data for marketing and communication purposes. This includes informing you about benefits and offers, promoting our products and services, and sending you updates, notifications and newsletters.

We may also analyse your data to better understand your preferences. This allows us to optimise our marketing activities, personalise our communications, and provide you with content that is more relevant to you. In some cases, we may work with trusted partners to assist with our marketing and communication activities.

We process your personal data for marketing purposes only based on your consent (Art. 6(1)(a) of the GDPR). For this purpose, we process the personal data mentioned in the first section.

You may withdraw your consent at any time by contact us at: passenger@finnlines.com. You can withdraw your consent to electronic direct marketing by clicking the unsubscribe link included in our marketing emails or by following the instructions in mobile marketing messages. You may also manage your consents and preferences through the Star Club Membership Portal.

3. Storage of Personal Data

We will store your personal data for as long as is needed to fulfil the above purposes. As a rule, your data is stored based on the following principles:

- Personal data related to Star Club Loyalty Programme will be stored during the membership and one month after the membership ends.
- Personal data related to Finnlines App will be stored in the application as long as the member uses Finnlines App.
- Personal data related to our legitimate interest will be stored for two years.
- Personal data related to marketing will be stored until the termination of your Star Club membership, if you do not withdraw your consent.
- Personal data related to service provision may be stored even after your membership ends, if required by a law or in case of a legal claim or complaint.

4. Sources of Personal Data

We collect personal data directly from you when you register to the Star Club Loyalty Programme or enter information into the Star Club Membership Portal. We also collect personal data when you use our Finnlines App or make a booking, use our services or shop onboard with your Star Club ID. As a Star Club member, you can update and manage your personal data on the Membership Portal at any time.

5. Disclosures

Personal data may be disclosed to public authorities when required by law. Disclosure of personal data may also be based on your consent, if you allow us to share your data with our partners.

We may use trusted third-party service providers to support and maintain our IT systems. These providers process personal data on our behalf and follow our instructions. We make sure that all service providers handle your data securely and in line with confidentiality requirements, data processing agreements, and applicable data protection laws.

We do not transfer your personal data outside the EU/EEA.

6. Security

We process your personal data lawfully, fairly, and transparently. We only collect and use personal data for clear and legitimate purposes explained in this Privacy Notice, and we do not use it for anything incompatible with those purposes.

We take appropriate technical and organisational measures to protect personal data and keep it safe. These safety measures include secure login and authentication to access systems where the personal data is processed or stored, firewalls and network security, and access controls such as personal usernames and passwords, among other suitable security measures.

Only employees who need personal data for their work tasks are allowed to access it. All authorised personnel are required to keep personal data confidential.

7. Your Rights

You have the right to know whether we process your personal data, and to access the data we hold about you.

You can ask us to correct or delete your data, or to limit how we use it, in line with applicable data protection laws. You may also have the right to object to how we use your data or to request that your data be transferred to you or another party.

If we process your data based on your consent, you can withdraw your consent at any time. Please note that this will not affect any processing we have already carried out based on your consent before it was withdrawn. For more information about withdrawing your consent, please see Section 2.3.

If you would like to exercise your rights, please contact Finnlines' Data Protection Officer at: dataprivacyofficer@finnlines.com.

You also have the right to file a complaint with a supervisory authority if you are unhappy with how we handle your data. In Finland, this authority is the Data Protection Ombudsman (www.tietosuoja.fi/en).