

PRIVACY POLICY

BALASAILING Limited trading as MOBILE YachtBroker (“we”) are committed to protecting and respecting your privacy.

SCOPE OF POLICY

This policy (together with our end-user licence agreement as set out at <http://www.mobileyachtbroker.com/pdf/eula.pdf> (“EULA”) and any additional terms of use incorporated by reference into the EULA, (together “our Terms of Use”) applies to your use of:

The YachtBroker mobile application software (“App”) that will be hosted on <https://appsto.re/hu/ngmX8.i> (“App Site”), also downloadable via our website <http://www.mobileyachtbroker.com> once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (“Device”);
The website <http://www.mobileyachtbroker.com> (“Website”); and

Any of the services accessible through the App or Website (“Services”) or that are available on the App Site or Website or other sites of ours (“Services Sites”).

This 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. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 1998, the data controller is BALASAILING Limited, a company registered in England under company number 09426014 whose registered office address is at Ocean Village Innovation Centre, Ocean Way, Southampton, SO14 3JZ, UK, trading as MOBILE YachtBroker.

1. INFORMATION WE MAY COLLECT FROM YOU

1.1. We may collect and process the following data about you:

1.1.1. **Information you give us (“Submitted Information”):** You may give us information about you by filling in forms on the App Site, the Website and/or our other websites (together “our Sites”), or by corresponding with us (for example, by e-mail or chat). This includes information you provide when you register to use the App Site, download or register the App, subscribe to any of our Services, search for an App or Service, make an in-App purchase or order for third party contractor Services using the App and when you report a problem with an App, our Services, or any of our Sites. The information you give us may include your name, address, e-mail address and phone number, the Device's phone number, age, username, password and other registration information, financial and credit card information, personal description and photograph, your location or other details about your property or use of the Services.

1.1.2. **Information we collect about you and your Device.** Each time you visit one of our Sites or use one of our Apps we may automatically collect the following information:

1.1.2.1. technical information, including the type of Device you use, a unique Device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use and time zone setting (Device Information);

1.1.2.2. details of your use of any of our Apps or your visits to any of our Sites 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 (Log Information).

1.1.2.3. Location information. We may also use GPS technology or other technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by emailing us at app@mobileyachtbroker.com.

1.1.2.4. Information we receive from other sources (Third Party Information). We are working closely with third parties (including, for example, a third party who has authorised you to access the Services on their behalf ("Trader"), business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

1.2. If you contact us, we may keep a record of that correspondence.

1.2.1. **Unique application numbers:** when you install or uninstall the Services containing a unique application number or when such Services search for automatic updates, that number and information about your installation, for example, the type of operating system, may be sent to us.

2. COOKIES

2.1. We use cookies to distinguish you from other users of the App, App Site, Appstore or Services Site. This helps us to provide you with a good experience when you use the App or browse any of the App sites and also allows us to improve the App and our sites.

2.2. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

2.3. We will be using the following cookies:

2.3.1. [to be inserted]

2.4. We may use the following cookies:

2.4.1. **Strictly necessary cookies.** These are cookies that are required for the operation of the Website. They include, for example, cookies that enable you to log into secure areas of the Website, use a shopping cart or make use of e-billing services.

2.4.2. **Analytical/performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

2.4.3. **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

2.4.4. **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

2.5. Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

2.6. You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

2.7. The cookies we use are not currently configured to expire after a specific period.

3. USES MADE OF THE INFORMATION

3.1. We use information held about you in the following ways:

3.1.1. Submitted Information: Will be used to enable us to provide the requested Services.

3.1.2. Device information: No Device information is required for the App.

- 3.1.3. Log information: No logs will be stored in the Device or App apart from the one provided by the operating system, however, server error log information will be used for maintenance purposes.
- 3.1.4. Location information: No location information will be used in the App, however all information relevant to location will be forwarded to third party map applications.
- 3.1.5. Third Party Information: Maps, as above.
- 3.2. We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.
- 3.3. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with anonymous aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

4. DISCLOSURE OF YOUR INFORMATION

- 4.1. We may disclose some or all of the data we collect from you when you download or use the App to any Trader or supplier to the extent reasonably necessary to enable us to provide the Services in accordance with the Services agreement.
- 4.2. We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.
- 4.3. We may disclose your personal information to third parties:
 - 4.3.1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
 - 4.3.2. If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.
 - 4.3.3. If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.

4.3.4. In order to:

4.3.4.1. enforce or apply the EULA, or the terms of our agreement with you for the provision of property managing services and other agreements or to investigate potential breaches; or

4.3.4.2. protect the rights, property or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4.3.5. [Details of any other third party disclosures]

5. WHERE WE STORE YOUR PERSONAL DATA

5.1. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

5.2. All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted in Secured Sockets Layer technology for web and mobile data encryption. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

5.3. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

5.4. We may collect and store personal data on your Device using web browser storage technology (HTML5).

6. YOUR RIGHTS

6.1. You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such

processing by checking certain boxes on the forms we use to collect your data.

You can also exercise the right at any time by contacting us at BALASAILING Limited, Ocean Village Innovation Centre, Ocean Way, Southampton, SO14 3JZ, UK or app@mobileyachtbroker.com .

- 6.2. Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

7. ACCESS TO INFORMATION

- 7.1. The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.
- 7.2. You can access your personal data via the App if you are a Client of WCS and can request that we make any corrections, updates, or deletions to that data by email to app@mobileyachtbroker.com .

8. CHANGES TO PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you when you next start the App or log onto one of the Services Sites. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or our Services.