



Viking Privacy Policy

Last updated on: 28 October 2024

1. INTRODUCTION

Viking Cruises International Ltd and its group of companies (the “Company”, “We”, “Us” or “Our”) is committed to respecting and protecting Your privacy. This Privacy Notice is provided for as applicable, (i) Our prospective, existing and former customers, and (ii) personnel representing Our business partners such as Our travel agents (“You” or “Your”).

This Privacy Notice (together with Our **Cookie Notice**, and the terms of use published at www.vikingcruises.co.uk/terms-conditions/index.html) (the “Notices”) tells You about how We process Your personal data, including Our collection, usage and sharing of Your personal data, and including in relation to Your use of Our website at www.vikingcruises.co.uk, or other jurisdiction specific sites, as applicable (the “Website”).

In this Privacy Notice, each of the terms “personal data”, “Data Controller”, “Data Processor” has a special meaning that is set by, or otherwise equivalent to the term adopted by, legislation in the relevant jurisdiction (the “Data Protection Legislation”). The Data Protection Legislation is, as applicable: the EU General Data Protection Regulation (2016/679) and/or other applicable data protection laws and regulations.

Depending on where You are based and how You interact with Us, additional jurisdiction-specific terms as set out at Annex of the Notice, and other applicable privacy notices may apply and prevail to the extent there is conflict with the Notices. These other privacy notices may include:

- Privacy Policy of Viking Cruises UK Limited available at [here](#), applicable to Our processing of personal data of existing, prospective or former customers who are residents of UK and EU
- Privacy Policy of Viking Cruises, Inc. available at [here](#), applicable to Our processing of personal data of existing, prospective or former customers who are residents of US and Canada
- Privacy Policy applicable to Our Investor Relations website and any associated services available at [here](#); and
- Privacy Policy of Viking Cruises Australia PTY. LTD., available at [here](#), applicable to Our processing of personal data of existing, prospective or former customers who are residents of Australia.



2. YOUR DATA CONTROLLER

We are a Data Controller in relation to Your personal data. Our address is Clarendon House, 2 Church Street, Hamilton HM11, Bermuda.

DATA PROTECTION OFFICER

Our Data Protection Officer can be contacted at data.protection@vikingcruises.com (if you are located in the UK or EEA) or privacy.request@viking.com (if you are located elsewhere).

3. INFORMATION WE COLLECT ABOUT YOU, HOW WE USE IT AND WHERE WE GET IT FROM

In general, We obtain and process different categories of personal data about You. We have set these out in the table below together with the lawful basis for Our use of Your personal data and the source of this personal data. If You are resident outside of the UK and EEA, please also refer to the relevant jurisdiction-specific terms set out in Annex for further detail.

Personal data We use	How We use it	Lawful basis / condition for processing	Source of personal data
<u>Identifiers, contact information and details regarding Your booking</u> Name, mailing address, telephone number, email address, date of birth, Viking account username and password, preferred destination and dates, facilities required on the cruise, whether You consider Yourself to have a disability,	In order to complete a booking with You. To provide You with Our services in accordance with Our contract with You, once You have completed a booking. To provide personalised cruise plans for You. Specific to travel agent and other business partner services scenarios,	Performance of a contract with You. Necessary for Our legitimate interests in identifying Our customers. Necessary to comply with a legal obligation. <i>If You provide Us with sensitive personal data (such as your medical needs): We will ask You for explicit consent.</i>	<u>Directly from You</u> when You make an enquiry (such as asking for a brochure), when You enter one of Our competitions, promotions or surveys, when You give Us information via email or online private mail systems, during a telephone conversation or online chat with Us, information You provide via our



<p>medical needs and dietary needs.</p>	<p>to engage You or the organization You work for as Our business partner, and to administer and manage Our business relationship with the organization You work.</p>	<p>Specific to travel agent and other business partner services scenarios, to perform a contract with the organization You work for as Our business partner, or We will ask for Your explicit consent directly from you or indirectly from the organization You work for.</p>	<p>Website (such as registering as a user, booking, or posting on Our online forums), via social media messages or if You report something to Us such as a problem with Our Website.</p> <p>If You are using a travel agent, We will obtain this information from Your travel agent.</p> <p>Third parties in Viking’s supply chain such as Airlines, other carriers, Border control agencies, or Contractors (e.g. ship crews).</p> <p>Our business contacts via Our business-to-business website including <u>the Travel Advisor Portal</u> for US/Canada or <u>Viking Asia TA Portal</u> for Asia</p> <p>If You are representing an organization which is one of Our business partners such as Our travel</p>
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			agents, We receive Your personal data from You and the organization You are representing during or as a result of the business relationship.
<u>Government Identifiers</u> Passport details or other government identification documents.	In order to complete a booking with You. To provide You with Our services in accordance with Our contract with You, once You have completed a booking. Verifying your identity in relation to requests you make.	Performance of a contract with You. Necessary for Our legitimate interests in identifying Our customers and in protecting Our business from security breaches, fraud, compliance and legal risks. Necessary to comply with a legal obligation.	Directly from You when you complete a booking with us. If You are using a travel agent, We will obtain this information from Your travel agent.
<u>Payment data</u> Your bank account number.	To process Your payment for Our services.	Our legitimate interest in obtaining payment before performing Our contract with You.	<u>Directly from you</u> when you complete a booking with us. Our bank or providers who process payments from You, to confirm the outcome of payment transactions.
<u>Demographic information</u> Gender, age, and zip code	For conducting research. For compiling aggregate data for	Legitimate business interest (the improvement of Our services).	<u>Directly from You</u> when you create a profile to register for a Viking account,



	internal and external business purposes.		request information from Us, visit the Website, use Our services, or provide Us with feedback.
<p><u>Marketing data</u> Your preferences regarding how We communicate with You (and what about), including whether You receive marketing communications from Us.</p>	Promote and market Viking services.	<p>Consent.</p> <p>Necessary for Our legitimate interests in developing and growing Our business.</p>	<p><u>Directly from You</u> when You create a profile to register for a Viking account, use the services, or through our email correspondence with You.</p>
<p><u>Internet Browser, Usage, and Log Data</u> When You visit Our Website and use Our services, we collect Your IP address; device, browser, and software characteristics (such as type and operating system); location; activity on the Website, including activities and content viewed, used, or accessed, the timestamp of Your visits or interactions, which links You click, which pages You view and how long You spend on those pages, , what search terms You use,</p>	<p>To check and confirm that We carry out Your instructions accurately, to enable Us to review and improve Our products, services and operations and customising or personalising the services for you.</p> <p>To help recognise You when You use other devices.</p> <p>To ensure that features and content from the Website are available for You (if You choose to use them) and are presented in the most effective</p>	<p>Legitimate business interest (administration and management of Our business, the improvement of Our services and meeting the requirements of Our existing and prospective customers).</p>	<p><u>As You interact with Our website</u>, We will automatically collect website and communication usage data about Your equipment, browsing actions and patterns. We collect this personal data through the operation of Your browser on Your device, by using cookies and other similar technologies. These technologies may be used by us directly or by third parties and service providers. Please see the section 6 USE OF TOOLS/COOKIES for</p>



<p>referral URLs, network state, device identifiers, or other unique identifiers; and identifiers associated with browser cookies. We also collect information about Your interactions with Our emails, such as whether You open a message and click any links within the message. If You use our mobile app, We collect information about where You downloaded it and how often You use the app.</p>	<p>manner for You and for Your devices.</p> <p>To keep Our Website, Our other IT systems and facilities safe and secure.</p> <p>Measure the effectiveness of Our email correspondence (including in respect of marketing) with You.</p> <p>Where relevant, or if required by the Data Protection Legislation, We will request Your consent as the basis of Our collection.</p>		<p>further details on cookies.</p>
<p><u>Location Information</u> We collect Your general location based on Your IP address</p>	<p>To ensure that We are complying with applicable laws.</p> <p>To tailor the content of Our Website for You.</p>	<p>Legitimate business interest (administration and management of Our business and the improvement of Our services).</p>	<p><u>Automatically from Your devices:</u> Like many companies, we use various technologies to automatically collect usage and interaction data when You interact with Our Websites and mobile apps or read Our emails. These tools include cookies, pixels, and SDKs. These technologies may be used by Us directly or by third parties</p>



			<p>and service providers.</p> <p>Please see the section 6 USE OF TOOLS/COOKIES for further details on cookies.</p>
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Sensitive Personal Data: Some of the above information is considered sensitive personal data under Data Protection Legislation and is subject to additional rights and protections. We only process this type of information if and to the extent permitted or required by applicable law. For example, so that We can tailor Our services to You in terms of food allergies or any medical conditions. Specifically, We collect the following sensitive personal data about You: whether You consider yourself to have a disability, medical needs and dietary needs.

From marketing sources

We love to receive new customers as a result of recommendations from Our existing customers, and We also actively seek new customers via marketing. We obtain personal data about prospective new customers from:

- You being on third party marketing lists, which We obtain via Webalytix Ltd, and which provides Us with contact details for You and an indication of why You may be interested in Our products or services;
- Your responses to Our online marketing or direct marketing to You, whether You respond by email, online chat, telephone, post, social media or other means;
- Your interactions with our online advertising (which is optimized to present our adverts to internet users who interact with Us via the internet) and advertisements placed by Our online advertising service providers. See the section 6 USE OF TOOLS/COOKIES for information about Our service providers.

We also use the same sources to learn more about Our existing customers, their preferences and interests, using information about where they visit on the internet.

4. MARKETING

In addition, we use all of the personal data listed at Section 3 above to create profiles about You and Your preferences, relevant to Your interest in the cruises, for direct marketing purposes and to send You direct marketing (unless You ask Us to stop), consisting of relevant information about future cruises and similar services that We



provide, such as offers of goods and services, brochures, new products, forthcoming events, loyalty programmes, clubs or competitions from Us or Our group companies. You have the right to stop these communications at any time by contacting uk-marketing@viking.com or data.protection@viking.com for individuals in the UK and EU or privacy.request@viking.com for all other regions.

If You are a resident in a territory mentioned in the Annex of this Privacy Notice, We will only carry out this marketing activity on the basis of Your consent. Where applicable to You, this will be stated in the additional jurisdiction-specific terms specific set out in the Annex.

5. CHILDREN

We do not provide products or services for purchase by children. If You are under 18 (or a lower age depending on the data protection legislation as specified in the jurisdiction-specific terms in Annex), Your parents or guardians are responsible for providing Your personal data to Us, and consenting to the use of Your personal data by Us on Your behalf.

If You are a resident in a territory mentioned in the Annex of this Privacy Notice, please refer to the jurisdiction-specific terms set out in the Annex.

6. USE OF TOOLS/COOKIES

If Our contact and dealing with You is via the Website(s), or on third party online services where Our advertising is displayed, cookies may be used. Generally, Our cookies do not obtain or use personal data. However, if You permit cookies, We may process the following items of Your personal data using cookies:

- application cookies may assign a unique ID to Our Website registered users, and may record their approximate location;
- behavioural cookies may use Your historical transaction data;
- analytics cookies may assign a unique ID to Our Website visitors;
- marketing cookies will assign a unique ID to internet users.

To find out more about what types of cookies We use, how We use cookies, how to disable them or to change Your cookie preferences, please refer to Our [**Cookies Notice \(UK\)**](#) or for other regions [**Cookie Notice**](#)



7. HOW LONG WE RETAIN YOUR PERSONAL DATA

We will hold Your personal data (including Your sensitive personal data) for as long as necessary to fulfil the purposes described in this Privacy Policy, and for 6 years thereafter for purposes of backup, archiving, fraud prevention, audits, or as required by applicable law.

Specifically, We will retain and process Your personal data for as long as You continue to use or express an interest in Our services or log into Our Website.

We will only keep Your personal data for a longer period where necessary in order to comply with Our legal obligations.

Please note that We may anonymize your personal data or use it for statistical purposes. We keep anonymized and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to any individual.

If You are a resident in a territory as mentioned in the Annex of this Privacy Notice, please refer to the jurisdiction-specific terms set out in the Annex.

8. DISCLOSURE OF YOUR PERSONAL DATA

We may share Your personal data with third parties in the circumstances and for the reasons described below.

(1) With Our corporate affiliates: We share all the personal data listed at the s 3 **INFORMATION WE COLLECT ABOUT YOU, HOW WE USE IT AND WHERE WE GET IT FROM** above with other companies in Our group. When We store and use Your personal data in electronic format, We use IT systems that are operated by Viking Cruise International Ltd located in Bermuda. We share this personal data on the basis of Our legitimate interests (administration and management of Our business).

(2) With Our service providers: We share all the personal data listed at Section 3 above with selected vendors and service providers who help Us to perform Our contract with You. This includes third parties who help Us directly (such as airlines and service providers on the ship, which operate globally including in Your intended cruise destination(s)), and third parties who help Us indirectly (such as our IT service providers, marketing mailing houses, providers of search engines, analytics services and behavioral marketing services). We do not share Your personal data with third parties for their own marketing purposes but We may authorise vendors to collect information on Our behalf, including as necessary to operate features of Our Websites. Sharing this personal data assists Us in the improvement and optimisation of Our Website, and to support and maintain Our IT infrastructure, and the overall provision of Our services. We share this personal data on the basis of Our legitimate interests (administration and management of Our business).



(3) With Your travel agent: We share Your Identifiers, contact information and details regarding your booking with Your travel agent if You have made a booking with Us through a travel agent. We do this to keep them (and You) informed of the details of Your booking and any changes to it. We share this personal data on the basis of Our legitimate interests (administration and management of Our business).]

(5) With Our banks and other payment processing service providers: We share Your payment data with Our banks and other payment processors to allow them to process Your payments to Us. We share this personal data on the basis of Our legitimate interest in obtaining payment before performing Our contract with You.

(6) For legal compliance: We may share any of the personal data listed at Section 3 above with Our professional advisors (including our accountants, auditors, legal advisers, insurers and insurance brokers), public authorities, regulators or government bodies for legal compliance and law enforcement purposes such as: in response to court orders or other legal processes, to establish or exercise Our legal rights; to defend against legal claims; or as otherwise required by applicable law; to enforce any agreement We or another party may have with You; and/or when We believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities. We share this personal information in order to comply with Our legal obligations and also on the basis of Our legitimate interests in ensuring that Our business is well advised about compliance issues.

(7) Mergers or corporate reorganisation: If another entity acquires Viking or all or substantially all of Our assets, Your information may be disclosed to such entity as part of the due diligence process and may be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganisation proceeding is brought by or against Us, all such information may be considered an asset of Ours and as such may be sold or transferred to third parties. We share this information on the basis of Our legitimate interests in administering Our business.

9. YOUR RIGHTS UNDER THE DATA PROTECTION LEGISLATION:

You are entitled to exercise some or all the rights described below with respect to Your personal data. To exercise Your rights, please email us at data.protection@viking.com for individuals in the UK and EU or privacy.request@viking.com for all other regions.

(1) **Right of access and data portability**: You have the right to access personal data that We hold about You and/or have it transferred to another data controller in some circumstances.

(2) **Right of rectification and erasure**: If You become aware of any inaccuracies in Your personal data which We process on Your behalf, You have a right to ask Us to rectify the



inaccuracies. You also have a right to ask us to erase personal data about You where You can demonstrate that the data we hold is no longer needed by Us, if You withdraw the consent upon which Our processing is based, or if You feel that we are unlawfully processing Your data. Your right of rectification and erasure extends to anyone we have disclosed Your personal data to and We will take all reasonable steps to inform those with whom We have shared Your data about Your request for erasure.

(3) **Right to object:** You have the right to object to Our processing of Your personal data. This includes the right to object to the use of Your personal data for direct marketing purposes and profiling purposes. Where we send marketing communications to You via email, You can also opt out of receiving any further marketing communications by clicking the 'unsubscribe' or 'opt-out' option in that email.

(4) **Right to restriction of processing:** You have the right to ask Us to restrict Our processing of your personal data to the extent that (a) You have questioned the accuracy of the personal data and We are still checking its accuracy, (b) it is established that We did not have the lawful right to process the personal data, (c) We no longer need to use Your personal data for the purposes We collected or used it for but You need it to be preserved for the purposes of legal claims, or (d) You have exercised Your right to object to Our use of your personal data and no exception applies to permit Us to keep using it.

(5) **Right to opt-out of automated decision making:** You have the right not to be subject to automated processing which significantly affects You, unless We need to carry out the automated decision-making to enter into or perform Our contract with You, or We are authorised by law to use the personal data for automated decision-making, or We have Your explicit consent.

(6) **Right to withdraw consent:** You have the right to withdraw Your consent for the processing of Your personal data where the processing is based on consent.

If You are a resident in a territory as mentioned in the Annex of this Privacy Notice, please refer to the jurisdiction-specific terms set out in the Annex.

10. OUR PROTECTION OF YOUR PERSONAL INFORMATION

We have taken reasonable steps to put in place appropriate security measures to protect Your personal data when it is processed by Us or on Our behalf from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction. We take reasonable measures as appropriate in the circumstances to protect Your personal data and We have policies that are designed to prevent misuse of Your personal data by Our staff.

We do not accept any responsibility for the policies of third-party Data Controllers, such as providers of search engines and social media services. Your use of such third parties,



their websites and services is at Your own risk. Please check the third parties' privacy notices before You submit any personal data to them.

11. IMPACT OF WITHHOLDING PERSONAL DATA

You can always choose what personal data You wish to provide Us with. However, if You choose not to provide certain details, some of Your experiences may be impacted. For example, We require Your contact information and identifiers in order to make a booking for You.

12. CHANGES TO PRIVACY NOTICE

We reserve the right to make changes to this Privacy Notice from time to time. When We do so, we will take reasonable steps to notify You of any substantive updates to it.

Where relevant, or if required by the Data Protection Legislation, We will request Your consent to such changes.

13. YOUR COMMENTS AND QUESTIONS

If You have any questions or comments regarding the Privacy Notice, You can send Us an email at privacy.request@viking.com.

Last updated: July 2024



Annex: Jurisdiction-specific terms

1. Taiwan and Hong Kong

This Part of this Annex will apply if You are resident in Taiwan or Hong Kong. Unless specifically provided in this Part, the terms of the Privacy Notice remains applicable to You.

SPECIAL CATEGORY DATA WE COLLECT ABOUT YOU

Sensitive personal information refers to personal information that once leaked or illegally used, may easily lead to the infringement of the personal dignity of a natural person or may endanger their personal safety or property, including information such as biometrics, religious belief, specific identity, medical health status, financial accounts, and locational information, as well as the personal information of a minor under the age of 14.

In the limited circumstances where We process sensitive personal information, We do so only where there is a specific purpose and where it is necessary. We will only process sensitive personal information where:

- We have obtained an individual's separate consent (to the extent the processing relies on consent or as otherwise required by law); and
- We have notified the individuals concerned of the necessity of processing their sensitive personal information and the impact it has on their rights and interests, except where such notification is not required.

We will seek to protect the sensitive personal information rigorously using the security measures required by the applicable law and, hence, Your sensitive personal information should not be processed in a way that will result in negative implications to Your personal rights, e.g., harm to Your reputation, physical or mental health, personal or property security.

CHILDREN

We do not knowingly collect or solicit any information from anyone under the age of 14 or knowingly allow such persons to register on any Our services platform. In the event that We learn that We have collected personal information from a child under age 14 without appropriate permission from their parent/legal guardian, We will delete that information as quickly as possible.

If You are a minor under the age of 14, in the event that personal information is collected with the consent of Your parent/legal guardian, We will only use such information where it is permitted under laws and regulations and where the parent/legal guardian has given the express consent.



If You believe that We might have any information from a child under 14, or have concerns about personal information of a minor in Your custody, please contact us as provided in this Privacy Policy.

OUR USE OF YOUR PERSONAL DATA

We only process personal information in accordance with applicable laws, and only if:

- We have obtained Your consent;
- It is necessary for the conclusion or performance of a contract to which the You are a party;
- It is necessary for the performance of statutory duties or statutory obligations;
- It is necessary for coping with public health emergencies or for the protection of the life, health, and property safety of a natural person;
- The personal information processing is for the purpose of news reporting and supervision by public opinions for the public interest, and the processing is within a reasonable scope;
- The personal information is disclosed by You or other legally disclosed personal information is processed within a reasonable scope; or
- It is in accordance with other circumstances provided by laws and administrative regulations.

To the extent that “legitimate interests” which We rely on as indicated in the Privacy Notice is not a recognised legal basis under the Data Protection Legislation, We will seek Your consent or other applicable legal bases as described above to process Your personal information. In particular, We rely on Your consent for the processing of Your personal data for conducting marketing activities.

OUR TRANSFER OF YOUR PERSONAL DATA ABROAD

We will store Your personal information and keep such information strictly confidential in accordance with the Data Protection Legislation, and keep such information strictly confidential in accordance with the Data Protection Legislation.

As a global organization, where cross-border business is involved in some of Our products or services, We need to transfer personal information We will only do so in accordance with the Data Protection Legislation, including, where applicable, to inform You of the name and contact information of each overseas recipient, the purpose and means of processing by them, the type of personal information and the method and procedure for you to exercise the rights stipulated against them, and obtain Your consent where required.

If you would like to know more about our data transfer practices, please contact us using the details set out in the section 13 entitled “YOUR COMMENTS AND QUESTIONS” below.

YOUR RIGHTS UNDER THE DATA PROTECTION LEGISLATION



Subject to certain conditions and exceptions, You have certain rights regarding Your personal information as described below:

Access: You may have the right to request access to Your personal information that is being processed by Us.

Rectification: You may have the right to rectify incorrect or incomplete personal information or supplement relevant information.

Deletion: You may have the right to request that We delete certain personal information We have collected from You.

Opt-Out of Marketing: You may have the right to opt-out of receiving marketing communications from Us.

Object: You may have the right to object to, and the right to request that We restrict, Our processing of Your personal information in certain circumstances (including the right to request not to be subject to a decision based solely on automated processing).

Data Portability: In some circumstances where applicable, You may have the right to ask for the personal information You have made available to Us to be transferred to a designated personal information processor.

Withdraw Consent: You may have the right to withdraw any consent You have previously given Us to handle Your personal information. If You withdraw Your consent, this will not affect the lawfulness of Our use of Your personal information prior to the withdrawal of Your consent.

Explanation: You may have the right to request for explanation of Our rules for processing Your personal information.



2. Indonesia

This Part of this Annex will apply if You are an Indonesian national and/or are resident in Indonesia. Unless specifically provided in this Part, the terms of the Privacy Notice remain applicable to You.

For the purpose of this Part of this Annex, the Definition of “Data Protection Legislation” shall include the Law No. 27 of 2022 on Personal Data Protection, and its implementing regulations.

SPECIAL CATEGORY DATA WE COLLECT ABOUT YOU

Under the Data Protection Legislation, the following categories of personal data, which We may collect from You, have special status (the “special category data”): data concerning health, biometric data that uniquely identifies a living person, genetic data, data relating to actual or alleged crimes, personal finance data, and other categories of data that may be categorized as “specific personal data” under the applicable laws and regulations in Indonesia.

HOW LONG WE RETAIN YOUR PERSONAL DATA

We will hold Your personal data for as long as required under the applicable laws and regulations, or until You exercise Your rights to request for erasure or destruction of Your personal data.

Other than due to Your request to for erasure or destruction of Your personal data, We will erase Your personal data to the extent that: (a) We no longer need to use Your personal data; (b) the retention period of the personal data has expired; or (c) We rely on Your consent and You have withdrawn it; or (d) it is established that We did not have the lawful right to process Your personal data, or (e) Your personal data is not required for any legal proceedings, or (f) the law requires Us to erase Your personal data.

YOUR RIGHTS UNDER THE DATA PROTECTION LEGISLATION:

(1) You have the right to access personal data that We hold about You. Your right of access can be exercised in accordance with the Data Protection Legislation. You can submit a data access request at any time. In order to do this, please contact Us at privacy.request@viking.com

(2) If You become aware of any inaccuracies in Your personal data which We process on Your behalf, You have a right to ask Us to rectify the inaccuracies. On receiving Your request, We will either fulfil it or explain why We are unable to rectify the inaccuracies.



(3) You have the right to request us to erase Your personal data. If We erase Your personal data, Your ability to use Our services will be affected, as described above.

(4) You have the right withdraw Your consent for Us to process Your personal data for marketing purposes, and the right to object to any automatic profiling. You may exercise these rights at any time by emailing Us directly at privacy.request@viking.com.

(5) You have the right to object to Our processing of Your personal data to the extent that (a) We use the personal data on grounds of Our legitimate interests and no exception applies to permit Us to keep using it, or (b) We use it for direct marketing purposes, or (c) We use it for scientific or historical research purposes or statistical purposes and no exception applies to permit Us to keep using it.

(6) You have the right to ask Us to restrict Our processing of Your personal data to the extent that (a) You have questioned the accuracy of the personal data and We are still checking its accuracy, (b) it is established that We did not have the lawful right to process the personal data, (c) We no longer need to use Your personal data for the purposes We collected or used it for but You need it to be preserved for the purposes of legal claims, or (d) You have exercised Your right to object to Our use of Your personal data and no exception applies to permit Us to keep using it.

(7) You have the right to request that We provide to You, or to another data controller on Your behalf, a copy of any of Your personal data which We process using automated means based on Your consent, so that You may reuse such personal data for Your own purposes on alternative services.

(8) You have the right not to be subject to automated processing which significantly affects You, unless We need to carry out the automated decision-making to enter into or perform Our contract with You, or We are authorised by law to use the personal data for automated decision-making, or We have Your explicit consent.

(9) You have the right to complain to the competent personal data protection institution of Indonesia if You have any concerns in respect of the handling of Your personal data by the Company.

(10) You have the right to request us to (permanently) destroy Your personal data. [If We destroy Your personal data, You will no longer have access to Our services.]

If You would like to exercise any of the above rights, including to withdraw Your consent (where Our processing of Your personal information relies on Your consent), please contact Us at privacy.request@viking.com.



3. Japan

This Part of this Annex will apply if You are a resident in Japan. Unless specifically provided in this Part, the remaining terms of the Privacy Policy remains applicable to You.

OUR TRANSFER OF YOUR PERSONAL DATA ABROAD

We will transfer Your personal data to a location that is outside Japan, under the following circumstances:

- (1) when We have Your consent;
- (2) when the third party is located in a member state of the European Economic Area or in the UK; or
- (3) when the third party has established a system necessary to continuously implement measures comparable to the measures that a personal information handling business operator in Japan should take.

In the case of (1), the third parties to which We transfer Your personal data may include authorities, regulators or local tour vendors. However, the third parties will vary depending on Your travel plans and may not be confirmed until Your travel plans are finalized. For information on data protection regulations in major countries, please refer [here](#).



4. Malaysia

This Part of this Annex will apply if You are a Malaysian national and/or are resident in Malaysia. Unless specifically provided in this Part, the terms of the Privacy Notice remain applicable to You.

For the purpose of this Part, the Data Protection Legislation includes the Personal Data Protection Act 2010 of Malaysia (the “Malaysian Law”). The terms “personal data” and “Data Processor” each have a special meaning as set out in the Malaysian Law. The term “Data Controller” should refer to “Data User” in the Malaysian Law.

SENSITIVE PERSONAL DATA WE COLLECT ABOUT YOU

Under the Malaysian Law, the following categories of personal data which We may collect from You, have special status (the “sensitive personal data”): personal data consisting of information as to Your physical or mental health or condition, Your political opinions, Your religious beliefs or other beliefs of a similar nature, the commission or alleged commission by You of any offence or any other personal data as the Minister charged with the responsibility for the protection of personal data in Malaysia may determine by order published in the Gazette in Malaysia. We may obtain sensitive personal data when We collect it directly from You, or from Your travel agent. We do not obtain sensitive personal data from other third parties.

CHILDREN

We do not provide products or services for purchase by children. If You are under 18, Your parents are responsible for providing Your personal data, and the consent to process Your personal data, to Us.

HOW LONG WE RETAIN YOUR PERSONAL DATA

We will not retain Your personal data for any period of time longer than is necessary to serve the purposes set out in this Privacy Notice and any valid business or legal purposes. After this period of time, We will destroy or anonymise any documents containing Your personal data in a safe and secure manner.

OUR TRANSFER OF YOUR PERSONAL DATA ABROAD

As stated above, in some cases We will transfer Your personal data to a location that is outside of Malaysia. The transfer of Your personal data outside of Malaysia is lawful if:

- We have Your explicit consent to the transfer and processing of Your personal data to, and at, locations outside of Malaysia. By signifying Your consent to this Privacy Notice, You hereby consent to Us transferring and processing Your personal data to, and at, locations



outside of Malaysia which may include but are not limited to Japan, China, Europe, Bermuda and/or the United States;

- The transfer is necessary for the performance of a contract entered between Us and You;
- The transfer is necessary for the conclusion or performance of a contract entered between Us and a third party which –
 - (a) is entered into at Your request; or
 - (b) is in Your interest;
- The transfer is for the purpose of any legal proceedings or for the purpose of obtaining legal advice or for establishing, exercising or defending legal rights;
- We have reasonable grounds for believing that in all circumstances of the case:
 - (a) the transfer is for the avoidance or mitigation of any action against You;
 - (b) it is not practicable to obtain Your consent in writing to that transfer; and
 - (c) if it was practicable to obtain such consent, You would have given Your consent;
- We have taken all reasonable precautions and exercised all due diligence to ensure that Your personal data will not in that place be processed in any manner which, if that place is Malaysia, would be a contravention of the Malaysian Law;
- The transfer is necessary in order to protect Your vital interests; or
- The transfer is necessary as being in the public interest in circumstances as determined by the Minister charged with the responsibility for the protection of personal data in Malaysia.

YOUR RIGHTS UNDER THE DATA PROTECTION LEGISLATION:

Right of rectification and erasure: If You become aware of any inaccuracies, incomplete or outdated information in connection with Your personal data which We process on Your behalf, You have a right to ask Us to make corrections and/or updates to Your personal data. You also have a right to ask us to erase personal data about You where You can demonstrate that the data we hold is no longer needed by Us, if You withdraw the consent upon which Our processing is based, or if You feel that we are unlawfully processing Your data. Your right of rectification and erasure extends to anyone we have disclosed Your personal data to and We will take all reasonable steps to inform those with whom We have shared Your data about Your request for erasure.

Right to restriction of processing: Subject to any applicable legal restrictions and/or contractual conditions, You have the right to ask Us to restrict or limit Our processing of Your personal data



If You have any concerns in respect of the handling of Your personal data by the Group, You have the right to:

- (a) make queries or complaints to Us relating to Your personal data by contacting Us at privacy.request@viking.com; and/or
- (b) complain to the Personal Data Protection Commission of Malaysia.

If You would like to exercise any of the above rights, including to withdraw, restrict or limit Your consent (where Our processing of Your personal data relies on Your consent), please contact Us at:

Person in charge : Vanessa Dehrmann
Designation : VP, Compliance
Contact number : +1 818 227 1234
E-mail address : privacy.request@viking.com

The other rights described in the Privacy Notice will continue to apply to You.

CONFLICT

If there is any conflict between the Bahasa Malaysia and English versions of this Privacy Notice, the English version shall prevail.



5. Philippines

This Part of this Annex will apply if You are a Philippine national and/or an individual resident in the Philippines. Unless specifically provided in this Schedule, the remaining terms of the Privacy Policy remains applicable to You.

By visiting Our Website or otherwise providing us Your personal data through any of the processing circumstances enumerated in this Privacy Notice, You expressly authorize and consent to Our processing of Your Personal Data for the Purposes, and in the manner described in this Privacy Notice.

You will be asked to consent to Our processing the terms of Our Privacy Notice at various points of interaction with us, such as when booking or making a reservation, completing Passenger Information Form when online check-in, registering for events or promotions or otherwise corresponding with us or otherwise where required under applicable law.

For the purpose of this Schedule, the Data Protection Legislation includes the Republic Act No. 10173 or the Data Privacy Act of 2012 (“Philippines Law”). The terms “personal data processing” and “Sensitive Personal Information” each have a special meaning that is set by the Philippines Law. The term “Data Controller” should refer to “Personal Information Controller”, and the term “Data Processor” should refer to “Personal Information Processor” in the Philippines Law.

HOW LONG WE RETAIN YOUR PERSONAL DATA

We will retain Your Personal Data for as long as necessary to fulfill the Purposes, for legitimate business reasons including to satisfy legal, regulatory, compliance or contractual obligations; to establish, exercise, or defend legal claims; or to comply with Our data retention policies as may be permissible by law.

OUR TRANSFER OF YOUR PERSONAL DATA ABROAD

As stated above, Your personal data may be transferred to, and processed in, countries other than the country in which You live – such as but not limited to, the United States, the People’s Republic of China, various countries in Europe and Asia where We have affiliates, agents, and cooperation partners who need the data to fulfill their roles for the Purposes above.

We ensure that Your personal data are protected using reasonable and appropriate organizational, physical and technical security measures, including having appropriate data transfer agreements with recipients of Your personal data, unless the transfer is based on other legal grounds.

YOUR RIGHTS UNDER THE DATA PROTECTION LEGISLATION:



(1) You have the right to reasonable access to, upon demand, personal data that We hold about You. Your right of access can be exercised in accordance with the Data Protection Legislation. You can submit a data access request at any time. In order to do this, please contact Us at data.protection@viking.com.

(2) If You become aware of any inaccuracies in Your personal data which We process on Your behalf, You have a right to ask Us to rectify the inaccuracies. On receiving Your request We will either fulfil it or explain why We have decided not to.

(3) You have the right to suspend, withdraw or order the blocking, removal or destruction of Your Personal Data from Our filing system upon discovery and substantial proof of any of the following:

- Your personal data is incomplete, outdated, false or unlawfully obtained;
- Your personal data is being used for a purpose You have not authorized;
- Your personal data is no longer necessary for the purposes for which they Were collected;
- You have withdrawn consent or objected the processing and there is no other legal ground or overriding legitimate interest for the processing;
- Your personal data concerns private information prejudicial to You, unless justified by freedom of speech, of expression or of the press or otherwise authorized;
- The processing is unlawful;
- We or Our personal information processors violated Your data subject rights.

If We erase Your personal data, Your ability to use Our services will be affected, as described in this Privacy Notice.

(4) You have the right to ask Us not to process Your personal data for marketing purposes (including profiling). You may unsubscribe at any time by emailing Us directly at data.protection@viking.com.

(5) You have the right to object to the processing of Your personal data including processing for direct marketing, automated processing, or profiling. You may also withhold consent to processing in case of changes or any amendment to the information supplied to You. When You notify us that You are withholding consent, We shall no longer process Your Personal Data unless:

- The Processing is required pursuant to a subpoena, lawful order, or as required by law;
- There are other lawful bases or criteria under the the Data Protection Legislation for the collection and processing of the personal data.

(6) You have the right to ask Us to restrict Our processing of Your personal data to the extent that (a) You have questioned the accuracy of the personal data and We are still checking its accuracy, (b) it is established that We did not have the lawful right to process the personal data, (c) We no longer need to use Your personal data for the purposes We



collected or used it for but You need it to be preserved for the purposes of legal claims, or
(d) You have exercised Your right to object to Our use of Your personal data and no exception applies to permit Us to keep using it.

(7) You are entitled to receive a copy of Personal Data that You may have provided, in such electronic or structured format for further use, subject to the guidelines of the National Privacy Commission with regard to the exercise of such right. You have the right to request that We provide to You, or to another Personal Information Controller on Your behalf, a copy of any of Your personal data which We process using automated means based on Your consent, so that You may reuse such personal data for Your own purposes on alternative services.

(8) You have the right not to be subject to automated processing which significantly affects You, unless We need to carry out the automated decision-making to enter into or perform Our contract with You, or We are authorised by law to use the personal data for automated decision- making, or We have Your explicit consent.

(9) You have the right to lodge a complaint with the National Privacy Commission in case Your rights as a data subject have been violated.

If You would like to exercise any of the above rights, including to withdraw Your consent (where Our processing of Your personal information relies on Your consent), please contact Us at data.protection@viking.com.



6. Singapore

This Part of this Annex will apply if You are a resident in Singapore. Unless specifically provided in this Part, the remaining terms of the Privacy Notice remain applicable to You.

For the purposes of this Part:

- the definition of “Data Protection Legislation” shall include the Personal Data Protection Act 2012 of Singapore (“**PDPA**”), and subsidiary legislation issued under the PDPA.
- the terms “personal data”, “Data Controller”, “Data Processor” adopted in the Privacy Notice shall have the meaning given to the terms “personal data”, “organisation” and “data intermediary”, respectively, in the PDPA.

DATA PROTECTION OFFICER

Our Data Protection Officer can be contacted at privacy.request@viking.com].

INFORMATION WE COLLECT ABOUT YOU, HOW WE USE IT AND WHERE WE GET IT FROM

Where we obtain and process different categories of personal data about You, we will do so either with Your express consent or where Your consent is deemed to be given in accordance with the PDPA (for example, where we collect personal data about You from third parties to whom You have provided Your consent to disclose that personal data to us), or where we otherwise rely on an exception to processing personal data without consent as set out in the PDPA (including for our legitimate interests).

MARKETING

We will only carry out direct marketing activities on the basis of Your express consent.

CHILDREN

If You are [under 13, Your parents or guardians are responsible for providing Your personal data to Us, and consenting to the use of Your personal data by Us on Your behalf.



DISCLOSURE OF YOUR PERSONAL DATA

To the extent we disclose Your personal data to Our corporate affiliates or to third parties, we will do so either with Your express consent or where Your consent is deemed to be given in accordance with the PDPA (for example, where we collect personal data about You from third parties to whom You have provided Your consent to disclose that personal data to us), or where we otherwise rely on an exception to processing personal data without consent as set out in the PDPA (including for our legitimate interests).

YOUR RIGHTS UNDER THE DATA PROTECTION LEGISLATION

You are entitled to exercise the rights described below. To exercise Your rights, please email us at privacy.request.com

(1) **Right of access:** You have the right to access personal data that We hold about You in accordance with the PDPA.

(2) **Right of correction:** If You become aware of any error or omission in Your personal data which We process on Your behalf, You have a right to ask Us to correct such errors or omissions in accordance with the PDPA.

(3) **Right to withdraw consent:** You have the right to withdraw Your consent for the processing of Your personal data where the processing is based on consent including where Your consent is deemed to have been given in accordance with the PDPA.

OUR TRANSFER OF YOUR PERSONAL DATA ABROAD

To the extent that we transfer Your personal data to a location that is outside Singapore, we will do so in accordance with the requirements of the PDPA.