

REGNITION LIMITED

PRIVACY NOTICE

This Privacy Notice sets out how we at **Regnition Limited** use, protect and share the personal information that we collect from you when you use our website and our Services or when you interact with us or contact us in any other way.

WHO ARE WE?

Regnition Limited is the data controller responsible for your personal data (collectively referred to as “**Regnition**” “**we**”, “**us**” or “**our**” in this Privacy Notice).

Our full company details are:

Legal entity name: Regnition Limited

Company registration: Registered in England and Wales (Company number: 14920571)

Registered office: 2nd Floor College House, 17 King Edwards Road, Ruislip, HA4 7AE

Email address: info@regnition.com

You can contact us at the above address should you have any questions about this Privacy Notice, or if you would like to exercise any of your rights under Data Protection Laws, which we set out below.

WHAT TYPES OF INFORMATION DO WE COLLECT FROM YOU?

We may collect, use, store and transfer different kinds of personal information about you such as:

- **Identity, Contact and Account Information** about you including first name, last name, username or similar identifier, password and email addresses, date of birth, location, gender, profile pictures, language information, home address, telephone number.
- **Financial and Transaction Information** including your bank account and payment card details, billing address, details about payments to and from you and other details of the products and/or services you have purchased from us.
- **Technical and Usage Information** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access our website and information about how you interact with and use our website and Services.

- **Marketing and Communications Information** including your preferences in receiving marketing from us and our third parties and your communication preferences, tracking pixels to determine marketing effectiveness etc.
- **Services Information** including personal information that is required for us to provide our products and Services to you, including user content (e.g. photos, videos, other digital content), location (current, future and historic, e.g. identified via metadata in user content provided to Us or by you providing specific historical cruise location details, including via check-ins, third party ship tracking data, ship stops and ship and voyage information).

We also collect, use and share **Aggregated Information** such as statistical or demographic data for any purpose. Aggregated Information could be derived from your personal information but is not considered personal information in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Technical and Usage Information to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy notice.

HOW AND WHY DO WE USE YOUR PERSONAL INFORMATION?

How your information is collected:

- **When you interact with us:** you may share your personal information with us when you provide information using any means on our website, such as when you use our Services, create an account or update your profile, or adjust your marketing preferences, or when you engage with us, or when you correspond with us by email, post, telephone or any other means.
- **From third parties:** we may obtain your personal information from third parties such as your employer (which, when combined with other personal information we may have of yours, may also constitute personal information).
- **Automated Technologies and Cookies:** as you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. Please see our full Cookies Notice available on our website for further details.

How your information is used:

Data Protection Laws require us to have a legal basis for everything that we do with your personal information falling under one of the following categories:

- **Performance of a contract with you:** Where we need to perform a contract we are about to enter into or have entered into with you.

- **Legitimate interests:** We may use your personal information where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and/or enable us to give you the best user experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal information where it is necessary for compliance with a legal obligation that we are subject to.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal information for a specified purpose, in relation to receiving marketing emails from us.
- **Vital Interests:** We may process your personal information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

We use your personal information in a number of different ways and for different reasons – the tables below set out what we do and why:

Identity and Contact Information

What do we do?	Why do we do it?	What is the Legal Basis?
Identify you when you visit our websites or you contact us for any reason.	So we can identify you for account security, personalised services etc.	Legitimate interests: necessary for us to be able to communicate with you.
Process any payment for our products and Services and (a) Manage payments, fees and charges (b) Collect and recover money owed to us.	So we can provide you with the products and Services that you purchase.	Performance of a contract with you. Legitimate interests: necessary to ensure the financial health of our business and to manage our financial transactions efficiently.
To send you service updates, and updates to this Privacy Notice and/or our Terms.	So we can keep you informed of any changes to our, terms and data processing.	Legitimate interests: necessary for the effective provision of our products Services. Legal obligation.

To send you information about our business.	So we can let you know about new products and services that we offer that you might be interested in.	Consent. Legitimate interests: necessary to promote our business.
To send you surveys and to ask and respond to feedback and correspondence or otherwise correspond with us.	To offer you the opportunity to let us know how we are doing, to let us know your views on another subject, for us to leverage your feedback to further develop and tailor our business and to improve your experience.	Legitimate interests: necessary to ensure we are providing the best service and to identify any areas of potential improvement.
Create and manage user accounts.	To authenticate and manage user accounts.	Performance of a contract. Legitimate interests: necessary for the provision of products and Services.
Allow users to edit personal information, access and edit medical records, view invoices, add emergency contacts, adjust settings, and delete their account.	To manage user accounts and provide related services.	Performance of a contract. Legitimate interests: necessary for account management.
Provide customer support and respond to enquiries.	To resolve issues and assist with your requests.	Legitimate interests: to maintain customer satisfaction.

Financial and Transaction Information

What do we do?	Why do we do it?	What is the Legal Basis?
Take payments from you	To facilitate payment for the products and Services you purchase from us and to issue any refunds where necessary.	Performance of a contract with you. Legitimate interests: necessary to ensure that the company is compensated for our products and Services.

To keep a record of our transactions with you.	For accounting purposes.	Legal obligation.
To analyse and improve our products and Services.	To analyse transaction patterns.	Legitimate interests: necessary to improve our products and Services and business and develop new features.

Technical and Usage Information

What do we do?	Why do we do it?	What is the Legal Basis?
Identify you when you visit our website.	To provide you with the best possible user experience.	Legitimate interests: necessary to provide the best user experience.
Monitor visitors to our website and analyse their use of the website, and perform tests on our IT systems.	To protect our websites, and our IT systems from fraud or cyberattacks and to improve our website, Services and our IT security.	Legitimate interests: necessary to ensure our systems are secure and to protect against IT security incidents. Legal obligation.
Administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	For running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise.	Legitimate interests: necessary to run our business and to provide effective and secure administration and IT services, network security and to prevent fraud. Necessary to comply with a legal obligation.
Deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	To study how customers use our Services, to develop them, to grow our business and to inform our marketing strategy.	Legitimate interests: necessary to optimise our marketing efforts and deliver targeted advertisements.
Use data analytics to improve our website, Services, marketing, customer relationships and experiences.	To define types of customers for our products and Services, to keep our website updated and relevant, to develop our	Legitimate interests: necessary to enhance our business strategies and improve customer satisfaction.

	business and to inform our marketing strategy.	
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Marketing and Communications Information

What do we do?	Why do we do it?	What is the Legal Basis?
We keep a record of your communication preferences (your “opt ins” and “opt outs”).	So we can make sure that you only receive the communications from us that you would like to receive and so we can update our records if you change your mind.	Consent. Legitimate interests: necessary to promote our business. Legal obligation.

Services Information

What do we do?	Why do we do it?	What is the Legal Basis?
We use your data to provide the products and Services and to continually improve and develop the products and Services.	So we can make sure our products and Services continue to be fit for purpose and to develop the commercial offering of the products and Services.	Performance of a contract with you. Legitimate interests: necessary to improve our products and Services.
Enable customer support and user messaging.	To assist with queries and ensure product and Services quality.	Legitimate interests: to maintain operational efficiency.
Generate and manage order confirmations, invoices, and cancellations.	To manage transactions and provide order documentation.	Performance of a contract Legitimate interests: to ensure smooth operations.

All Personal Information

What do we do?	Why do we do it?	What is the Legal Basis?
We may transfer your personal information in part or whole in connection with	So we can ensure the continued service and function and to ensure we	Legitimate interests to ensure we can protect and grow our business.

any merger, sale, transfer of our assets, investment, acquisition, bankruptcy, or similar event or corporate transaction.	can protect and grow our business.	
Comply with legal and regulatory obligations.	So we can meet our legal responsibilities.	Legal obligation.
Retain your personal information to establish, exercise, or defend legal claims.	So we can protect our interests.	Legitimate interests: to seek legal advice, protect ourselves, our users or others in legal proceedings.

In limited circumstances we may process any of the personal information we hold to the extent necessary to defend, establish and exercise legal claims or to comply with legal or regulatory obligations.

Where we need to collect personal information due to a legal or regulatory obligation, or for performance of a contract, and you do not provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our Services). We will notify you of this at the time.

HOW CAN YOU MANAGE YOUR MARKETING PREFERENCES?

As an individual subscriber (i.e. acting in your individual capacity) when you fill in an online form on our website, you will be asked to indicate your preferences for receiving direct marketing communications from us. This will be via the ticking of a box which will be clearly marked as confirming your consent or relying on the soft opt-in where the relevant conditions are met.

You can also contact us at info@regniton.com

We will always get your express consent before we share your personal information with any third party for their own direct marketing purposes.

Please note that if you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes, for example, updates to our Terms, checking that your contact details are correct etc.

WHAT ABOUT COOKIES?

For more information about the cookies we use and how to change your cookie preferences, please see our Cookies Notice on our website.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We may share your personal information with third parties who provide services to us, for example, our IT, communications, CRM, email and marketing automation and hosting

providers. We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

The categories of data recipients we may disclose your personal information to are as follows:

Service Providers and Processors. We engage third party service providers, from time to time, including:

- IT & website hosting, CRM, fulfilment, communications and analytics service providers;
- Professional advisors such as tax or legal advisors (for example, as necessary for the establishment, exercise or defence of legal claims or to protect the rights or safety of the website or us;
- Consultants, insurance companies/claim managers and accountants; and
- Agents, suppliers or sub-contractors and other associated organisations where they are engaged by us to help deliver a service or product that we have instructed them on.

Relevant Parties as part of the provision of the product and/or Services: We disclose personal information as part of the fulfilment of our Services.

Third parties in case of a legal requirement. We also disclose your personal information if disclosure is required by law or in the context of an investigation, regulatory requirement, judicial proceeding, court order or legal process (including to law enforcement or competent authorities like the police/tax authorities, such as HMRC in the UK).

Third parties in case of a corporate transaction. In addition, information about our customers and users, including personal information, may be disclosed as part of any merger, sale, transfer of our assets, investment, acquisition, bankruptcy, or similar event, including while engaging with our actual or potential investors.

We may provide anonymous information to analytics and search engine providers to help us improve and optimise our services. We will only share this information in a form that does not directly identify you.

WHAT HAPPENS IF WE SHARE YOUR INFORMATION WITH ORGANISATIONS OUTSIDE OF THE UK?

Whenever we transfer your personal information out of the UK or the EEA to service providers or any other third party, we ensure a similar degree of protection is afforded to it by ensuring that the necessary safeguards are in place, for example:

- We will only transfer your personal information to countries that have been deemed by regulators in the UK or the EU to provide an adequate level of protection for personal information; or
- We may use specific standard contractual terms approved for use in the UK and EU which give the transferred personal information the same protection as it has in the UK and EU.

For more information about these safeguards, please contact us at info@regognition.com

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We are committed to protecting individuals' personal information. We put in place appropriate technical and organisational measures to help protect the security of your personal information. However, be aware that no system is ever completely secure.

We have put various safeguards in place to guard against unauthorised access and unnecessary retention of personal information in our systems. These include pseudonymisation, encryption, access, and retention policies.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. For further information about specific retention periods, please contact us at info@regognition.com

WHAT ARE YOUR RIGHTS IN RELATION TO THE PERSONAL INFORMATION WE HOLD?

You have a number of rights under data protection laws in relation to your personal information.

You have the right to:

- Request **access** to your personal information (commonly known as a "subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request **correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request **erasure** of your personal information in certain circumstances. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object** to processing of your personal information where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to **object** any time to the processing of your personal information for **direct marketing** purposes.
- Request the **transfer** of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Request **restriction** of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us at info@regognition.com

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

CONTACT US IF YOU HAVE A QUESTION OR A COMPLAINT

You have the right to make a complaint at any time to the relevant data protection regulator. In the UK this is the Information Commissioner's Office (ICO) (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach any regulator, so in the first instance please contact us at info@regnition.com

UPDATES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time and we keep it under regular review. This version was last updated on 30 July 2025.

THIRD-PARTY LINKS

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.