

PRIVACY POLICY

Sterling International Group Pte Ltd and its subsidiaries (“Sterling Group”)

Sterling Group respects your rights to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

1. Introduction

Sterling Group is a specialist broker in yacht personalized chartering. We provide our clients with bespoke solutions for yacht and superyacht chartering. Our office is located in the United Kingdom.

For more information about Sterling Group, please check our [Website](#).

2. Personal data that we collect

Sterling Group collects data to operate effectively and provide you with the best experience from our services.

Some of this data would have been provided directly by you, such as when you register for e-mail newsletters, submit an enquiry relating to yacht for charter, register for an event, or contact us for support.

You have choices about the data we collect. When you are asked to provide personal data, you may decline, but if you choose not to provide data that is necessary for Sterling Group to provide our service or a product or feature, you may not be able to use that service or product or feature.

The data we collect at Sterling Group depends on the context of your interactions with us, the choices you make, and the products and features you use. The data we collect can include the following:

Full name

Contact details

Personal preferences

Family information

The data we collect can include all personal preferences that are required and provided as part of the preparations of yacht charter. This information is handled with the utmost confidentiality and includes but is not limited to: nutritional information, flight and alternative travel preferences, personal expenses, religious faith and sensitive medical information.

3. When do we collect your data?

- When you enter into a contract with us
- When you register for our newsletters and/or updates
- When you attend industry events
- When you enter into correspondence with us by e-mail, phone, or post

4. How we use your personal data?

- The information we collect is used to help us identify bespoke yachting vacation options for each client. We use information such as email addresses and phone numbers to communicate with our clients regarding specific requests, updated news, or information about our company and yachting in general.
- We do not require users of our web site to register in order to access our online database or website. However, during the online inquiry process, a client must enter contact information and certain details about his or her needs. This is gathered to provide personal service to our clients.
- In the process of serving our clients we often receive additional types of sensitive information such as financial, family-related, or health information. We maintain the confidentiality of this personal information and do not share it with any third parties except as specified by the client in order to customize their vacation experience. An example of such would be to forward provisioning preferences to a yacht crew.
- We publish an electronic newsletter periodically, which utilizes our list of email addresses, but we have never shared or sold all or any part of said list. Furthermore, we allow users to unsubscribe to the list in every email.

5. Legal basis for processing personal information

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only (i) where we need the personal information to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

6. Who we share personal data with.

We may disclose your personal information to the following categories of recipients:

- The owner and management companies of the yachts to company any transaction or provide any service, product, or information you have requested or authorized.
- When you provide payment data to check or trace payment related matter or to receive a refund, we may share such data with banks or other entities that process the payment transactions or provide other financial services, and for fraud prevention and credit risk reduction.
- We may share data with vendors or agents working on our behalf for purposes described in this statement. For example, companies we have hired to assist in protecting and securing our systems and services may need access to personal data to provide these functions. In

such cases, these companies must abide by our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose.

- We may also disclose personal data to companies we have hired to assist in fulfilling a function or purchase that you have requested.

7. How we protect your personal data.

We understand how important data security matters to all our clients. With this in mind, we use appropriate measures to provide a level of security against the risk of processing your personal information.

8. What are your rights over your personal data?

You have the following data protection rights:

- The correction of your personal data when incorrect, out of date or incomplete;
- Stopping using your personal data for direct marketing (either through specific channels, or all channels);
- Stopping any consent-based processing of your personal data after you withdraw that consent;
- Request a copy of the personal data that we hold;
- Object to our processing of your data where that processing is based upon legitimate interest and there are no compelling grounds for the continued processing of that data;
- Request that we restrict processing of your data in certain circumstances;
- Request that data is erased where the continued use of that data cannot be justified;
- Withdraw your consent to our processing of your personal data for a particular purpose at any stage. However, please note that we may continue to retain, or otherwise use your personal information thereafter where we have a legitimate interest or a legal or contractual obligation to do so. Our processing in that respect will be limited to what is necessary in furtherance of those interests or obligations;
- Contact the regulator for any complaint with regard to data protection. For more information, please contact your local data protection authority.

9. Updates to this Privacy Policy

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

10. Contact Us

If you have any questions or concerns about our use of your personal information, please contact us using the following details:

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Faber House
Singapore 238854

Email: info@sterlinggroupcom.sg