



## SANDY LANE YACHT CLUB & RESIDENCES PRIVACY NOTICE & POLICY

### 1. *Purpose and Scope of Notice*

The [www.slycr.com](http://www.slycr.com) website (the "Website") is operated by Glossy Bay Marina Limited trading as the Sandy Lane Yacht Club & Residences (the "Sandy Lane Yacht Club & Residences", "SLYCR", "our", "we" and "us"). This Compliance Notice (the "Notice") is intended to explain how your information will be handled by SLYCR and sets out the basis upon which we use, process, store or disclose any information including the personal information detailed below relating to you ("Personal Data") that we will collect from you or that you provide to us through the Website. The information provided by you will be held by us as a controller.

This Notice, together with our **Terms of Use** and our **Cookies Policy** applies to your use of the Website.

If you have any queries in relation to this Notice or our practices regarding your Personal Data, please contact our Compliance Manager at [compliance@slycr.com](mailto:compliance@slycr.com)

### 2. *Your Personal Data Collected and Obtained*

We collect and process the following Personal Data when you use the Website:

#### *Device Information*

When using the Website and availing of services through the Website, Personal Data will be collected from you through the use of cookies and by us. This includes information about:

- Your device type, operating system, browser, IP address and other information derived from cookies used on the Website. Please see our **Cookies Policy** for further information; and
- Details of your visits to the Website such as traffic data, location data and the resources, advertisements and linked websites that you access through the Website.

You can choose to provide us with the following Personal Data:

#### *Correspondence Information*

- You may choose to give us information such as your name, e-mail address, address, telephone number and other details when contacting us by submitting enquiries through various sections on the Website.

#### *Marketing Information*

- Where we send you marketing and promotional material, we will use the information that you voluntarily provide us with in order to send this to you.
- We may also process information about how you interact with the emails, letters and SMS messages you receive from us, such as whether or not you open the communication, the links you click on, whether you purchase anything or whether you opt out of the communications.



- We may receive the following Personal Data about you from third party sources from social media platforms, such as Facebook, Twitter, LinkedIn and Instagram, when you interact with us via such platforms.

3. *How & Why we process your personal data:*

The following table details the legal bases on and purposes for which we collect and process your Personal Data:

Category of Personal Data	Legal Basis	Purpose	Important Things to note
Device Information	<b>Entering into or Performance of a Contract</b> It is necessary to process your Personal Data to enter into and perform our contract with you in relation to your use of the Website as set out in the <b>Terms of Use</b>	<b>Access to the Website</b> To provide you with access to the Website and to allow you to use the Website.	If you do not wish to provide us with your Personal Data for these purposes, we will not be able to enter into or perform our contract(s) with you and you will need to leave the Website.
Device Information Correspondence Information Marketing Information Social Media Information	<b>Compliance with a Legal Obligation</b> It is necessary for us to collect and process your Personal Data in order to comply with the legal obligations imposed on us.	To ensure compliance with our obligations under consumer, tax and other applicable laws.	
Device Information Correspondence Information Marketing Information Social Media Information	<b>To Defend, Establish or be a Party to Legal Claims</b> We may process your Personal Data as necessary in order for us to establish, investigate, exercise or defend a legal claim to which you are a party	<ul style="list-style-type: none"> <li>• To file legal proceedings</li> <li>• To investigate, establish, exercise or defend a legal claim</li> <li>• To settle legal claims</li> </ul>	
Device Information Correspondence Information Marketing Information Social Media Information	<b>Legitimate Interests</b> It is in our legitimate interests to collect and process your Personal Data for the purposes of improving and monitoring website efficiency,	<b>Improving Website Functionality and Efficiency</b> <ul style="list-style-type: none"> <li>• To provide, improve, test and monitor the effectiveness of the Website;</li> <li>• To monitor metrics such as total number of visitors,</li> </ul>	



Category of Personal Data	Legal Basis	Purpose	Important Things to note
	<p>enhancing your use of the website.</p> <p>It is also necessary for the purposes of our legitimate interests to process your personal data to respond to any queries or requests submitted by you to us.</p>	<p>traffic data and demographic patterns and</p> <ul style="list-style-type: none"> <li>• To ensure the content on the website is presented in the most effective manner for you and your device.</li> </ul> <p><b>Responding to queries:</b></p> <ul style="list-style-type: none"> <li>• To process and respond to any enquiries or requests that you submit to us through the website or by emailing us on any of our channels and</li> <li>• To seek your views on the website.</li> </ul> <p><b>Promotional and Marketing Materials:</b></p> <ul style="list-style-type: none"> <li>• To send you marketing communications about us and our services and/or offers where we process your data based on our legitimate interests, we make sure to consider and balance any potential impact on you and your privacy rights. We will not process your Personal Data where our interests are overridden by the impact on your privacy rights.</li> </ul>	

4. *Disclosure of your personal data*

We may disclose some or all of the Personal Data we collect from and obtain about you to the following third parties:

*Third Party Service Providers*

- To send you communications via third party communications or delivery services providers
- Tour operators and travel service providers



#### *Other Recipients*

- Prospective buyers of business assets (to facilitate the acquisition of SLYCR or a substantial portion of its assets by a third party)
- Where we are under a duty to disclose or share your Personal Data in order to comply with any legal or regulatory obligation or request

#### *5. Transfers of your personal data*

The Personal Data that we collect from you may be transferred to, and stored at, a destination outside of St Vincent & the Grenadines and may be transferred outside the European Economic Area ("EEA"). Where such transfers occur, it is our policy that data transfers do not occur without our prior written authority; and b) that an appropriate transfer agreement is put in place to protect your Personal Data. If you would like to find out more about any such transfers, please contact our Compliance Manager whose details are set out in Section 8 of this notice.

#### *6. Retention of your personal data*

In general, we expect to keep your Personal Data for as long as is reasonably necessary for the purposes for which it was obtained. Once we have determined that we no longer need to hold your Personal Data, we will delete it from our systems. Please note that in certain circumstances, we may hold your data for a longer period, for example, if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data.

#### *7. How we store and safe guard your personal data*

We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorized access to, and misuse of, your Personal Data. These include measures to deal with a suspected data breach. We are committed to taking reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorized access. We do this by having in place a range of appropriate technical and organizational measures.

#### *8. Changes to this notice and questions*

We may amend this notice on occasion, in whole or part, at our sole discretion. Any changes will be effective immediately upon communicating the revised notice to you. If at any time we decide to use your Personal Data in a manner significantly different from that stated in this notice, or otherwise disclosed to you at the time it was collected, we will notify you by the contact details you provide us with, and you will have a choice as to whether or not we use your Personal Data in the new manner.

If you have any questions, comments or concerns about the way your Personal Data are being used or processed by the Company, please submit your question, comment or concern in writing to request to our Compliance Manager in writing to [compliance@slycr.com](mailto:compliance@slycr.com).



9. *EU Guests- Your rights*

For our guests from the European Union, the following section sets out the rights applicable under the General Data Protection Regulation.

The table below sets out the rights which you have to address any concerns or queries with us about our processing of your Personal Data:

<b>Right</b>	<b>Further Information</b>
<b>Right of Access</b>	You have the right to request a copy of the Personal Data held by us about you. We will only charge you for making such an access request where we feel your request is unjustified or excessive.
<b>Right to Rectification</b>	You have the right to request that we amend any inaccurate Personal Data that we have about you.
<b>Right to Erasure</b>	<p>You have the right to ask us to erase your Personal Data where:</p> <ul style="list-style-type: none"> <li>• Your Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by us;</li> <li>• You withdraw your consent and no other legal ground permits us to process your Personal Data</li> <li>• You object to the processing and there are no overriding legitimate grounds for the processing;</li> <li>• Your Personal Data have been unlawfully processed; or</li> <li>• Your Personal Data must be erased in order to comply with a legal obligation.</li> </ul> <p>We may not be able to comply with a request where we require your Personal Data for compliance with a legal obligation or in connection with legal proceedings or for exercising the right of freedom of expression and information.</p>
<b>Right to Restriction of Processing</b>	<p>You have the right to ask us to restrict processing your Personal Data in the following situations:</p> <ul style="list-style-type: none"> <li>• where you contest the accuracy of your Personal Data;</li> <li>• where the processing is unlawful and you do not want us to delete your Personal Data;</li> <li>• where we no longer need your Personal Data for the purposes of processing but you require the data in relation to a legal claim; or</li> <li>• where you have objected to our processing of your Personal Data pending the verification of whether or not our legitimate business interests override your interests, rights and freedoms or in connection with legal proceedings.</li> </ul> <p>When you exercise this right we may only store your Personal Data. We may not further process the data unless you consent or the processing is necessary in relation to a legal claim or to protect the rights of another person or legal person or for reasons of important public interest. We will inform you before the processing restriction is lifted.</p>



<b>Right</b>	<b>Further Information</b>
<b>Right to Data Portability</b>	<p>You may request us to provide you with your Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible.</p> <p>This right only arises where:</p> <ul style="list-style-type: none"><li>• we process your Personal Data on your consent or where it is necessary to perform our contract with you; and</li><li>• The processing is carried out by automated means.</li></ul>
<b>Right to Object</b>	<p>You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.</p> <p>You have a right to object at any time to the processing of your Personal Data for direct marketing purposes.</p>

You can exercise any of these rights by submitting a request to our Compliance Manager in writing to [compliance@slycr.com](mailto:compliance@slycr.com)

We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay and at the latest within one month of receiving your request. We may extend this up to 2 months if necessary however we will inform you if this arises. Please note that we may ask you to verify your identity when you seek to exercise any of your privacy rights.

You also have the right to lodge a complaint with your privacy or data protection supervisory authority in the European Union.