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1. Principle

1. General information on the collection of personal data

Viking S.A., 21, Z.I. Haneboesch, L-4562 Differdange/Niederkorn, Luxembourg (in the following referred to as "**Viking EMEA**") attaches great importance to the protection of your personal data. This data privacy policy describes how Viking EMEA (also referred to in the following by the words "**we**", "**us**" and "**our**") uses and protects personal data collected at viking-emea.com ("**Viking EMEA website**").

Personal data are all data which refer to you personally, including for example your form of address, name, address, e-mail address, IP address, etc. We only collect and process your personal data in compliance with the provisions of the EU General Data Protection Regulation ("**GDPR**") and other provisions of European and applicable national data protection law (for example, UK GDPR).

Personal data are only collected and used on a regular basis with your consent or if the processing of such data is permitted by law. The following provisions provide information about the type, scope and purpose of the collection and processing of your personal data.

In the event that we make use of the services of commissioned service providers (third parties) for the purpose of providing specific functions for our website or of our services or if we use your data for advertising or analysis purposes, we will also inform you in detail in the following about the data processing taken. We also provide information about the stipulated criteria for and the period of storage. We also inform you about your rights with regard to each data processing activity.

The Viking EMEA website contains links to other websites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites. Please note that the third party websites might install their own cookies on your device and/or collect personal data. We have no control over this. Therefore, please make any inquiries about this directly with the providers of these linked websites.

2. Contact data

2.1. Name and address of person responsible for data processing ("**controller**")

Viking EMEA ("**controller**") is responsible for data protection within the meaning of the GDPR and under all other applicable EU data protection law. If you have any questions, suggestions or criticisms relating to data protection and our Viking EMEA website, please contact:

Viking S.A.
21, Z.I. Haneboesch
L-4562 Differdange/Niederkorn
Luxembourg
e-Mail: DataProtectionOfficer@viking-emea.com

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2.2. Name and address of the data protection officer

Any data subject (anyone affected of data processing activities) can contact our data protection officer with questions and suggestions directly at any time. Our data protection officer can be contacted as follows:

Viking S.A.

Data Protection Officer

21, Z.I. Haneboesch

L-4562 Differdange/Niederkorn

Luxembourg

e-Mail: DataProtectionOfficer@viking-emea.com

3. Notes on legitimacy and period of storage

3.1. Legitimateness of the processing of personal data

The processing of your personal data is legitimate if **you have given your consent** as stipulated in Article 6 (1) sentence 1 a) GDPR.

Under Article 6 (1) sentence 1 b) GDPR, the processing of your personal data is legitimate if such processing is necessary for the **performance of a contract** with you or your company. This also applies to all processing operations which are relevant prior to entering into a contract.

Under Article 6 (1) sentence 1 c) GDPR, the processing of your personal data is legitimate if such processing is necessary for **compliance with** one of our **legal obligations**.

Under Article 6 (1) sentence 1 d) GDPR, the processing of your personal data is legitimate if such processing is necessary in order to **protect your vital interests** or those of another natural person.

Under Article 6 (1) sentence 1 f) GDPR, the processing of your personal data is legitimate if such processing is necessary for the purposes of the **legitimate interests** pursued by our company or by a third party, except where such legitimate interests are overridden by your interests or fundamental rights and freedoms.

3.2. Period of storage and deletion of data

Any personal data which we collect, process and store will be kept by us for as long as there is a specific purpose for such storage. Your data will be deleted, or their processing restricted as soon as the specific purpose for which they were stored no longer applies.

It is possible, however, that European regulations, applicable national laws, or other rules may require us to store data which we have processed for a longer period of time. We will delete or restrict the processing of your data when these (statutory) data retention periods have expired.

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4. Your rights

For the purposes of the GDPR you are the **data subject** of any of your personal data which we process. As a data subject you have the following rights with regard to Viking EMEA:

4.1. Right of access by the data subject

You have the legal right to request information at any time about whether we are processing your personal data. If this is the case, you have the right to be informed about the extent to which your personal data is being processed (cf. Article 15 GDPR).

4.2. Right to rectification

You have the right to obtain from Viking EMEA the rectification of inaccurate personal data concerning you and/or to have incomplete personal data completed (cf. Article 16 GDPR).

4.3. Right to restriction of the processing

In certain circumstances you have the right to have the processing of your personal data restricted (cf. Article 18 GDPR).

4.4. Right to erasure ('right to be forgotten')

In certain circumstances you have the right to obtain from Viking EMEA the deletion of personal data concerning you without undue delay. The right to erasure does not apply if processing is necessary (cf. Article 17 GDPR).

4.5. Right to be informed

If you have asserted your right to rectification, erasure or restriction to Viking EMEA, Viking EMEA must communicate any rectification or deletion of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort (cf. Article 19 GDPR).

4.6. Right to data portability

You have the right to receive any personal data concerning you which you have provided to Viking EMEA in a structured, commonly used and machine-readable format. In certain circumstances you also have the right to transmit those data to another company without hindrance from Viking EMEA to which the personal data have been provided initially (cf. Article 20 GDPR).

4.7. Right to object

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you based on Article 6 (1) sentence 1 f) GDPR (cf. Article 21 GDPR). Viking EMEA may then no longer process the personal data relating to you unless Viking EMEA demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

If the personal data relating to you is processed for the purposes of engaging in direct advertising, you have the right to object at any time to the processing of your personal data for such advertising purposes. You can inform us of such objection by contacting us as follows:

Viking S.A.
21, Z.I. Haneboesch
L-4562 Differdange/Niederkorn
Luxembourg
e-Mail: DataProtectionOfficer@viking-emea.com

4.8. Right to withdraw the consent

You have the right to withdraw your consent at any time. The withdrawal of consent does not affect the legitimacy of processing based on consent before its withdrawal (cf. Article 7 GDPR).

4.9. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

5. Visits to our Viking EMEA website and creation of log files

Our system automatically collects data and information from your computer system every time you visit our Viking EMEA website. The following data may be then collected:

- Information about the type of browser you are using.
- Information about your operating system.
- Information about your internet service provider.
- Your IP address.
- The date and time of your visit to our website.
- Information about the website from which your system has reached our website.
- Information about the website which you access from our website.

The data which we collect on you is stored in our system's log files. As a rule, these data are not stored with other personal data. One exception to this rule is the information collected by us about your browser settings. We check your language settings in your web browser to display the Viking EMEA website in the appropriate language.

The temporary storage of data and log files is legitimate under Article 6 (1) sentence 1 f) GDPR. We have a legitimate interest in collecting and temporarily storing the data referred to as the IP address must be stored temporarily by the system in order to provide the website to your computer. Your IP address must be stored for as long as you are surfing on our website.

Data are stored in log files to ensure the functioning of the website. This information is also used to optimize our website and to warrant the security of our information technology systems. Your log files are not assessed for marketing purposes in this connection.

The data will be erased or altered in a way that prevents them being assigned to you as soon as they cease to be necessary for the purposes referred to here. Data which are stored in log files are erased after seven days.

6. Use of Viking EMEA login area

In order to use the Viking EMEA login area, you must register online.

6.1. Data required for the registration

When you register for the login area, you must enter your username, first and last name, phone and e-Mail address, and your company information such as company name, address, country as well as your position within the company.

You will also select a password during the registration process which you must keep secret and not divulge to third parties. Nor will Viking EMEA divulge your password to third parties.

The data mentioned above are needed to set up and manage a user account for you so that you can take full advantage of the Viking EMEA web services. We also need this information, and possibly other data, in order to react to requests, questions and criticism.

We also store the time of your most recent login.

During registration, you will also have the opportunity to provide other optional information, such as your preferred communication language, mobile phone etc. Please note that such information is not required for registration and that you alone decide whether to give us these data.

You are entirely free to communicate your personal data to us. If you choose not to do so, we might refuse certain services.

6.2. Data processing after registration

Designated Viking EMEA employees can access your data stored at Viking EMEA in order to, for example, provide you with information about products, services or technical training, or conduct surveys about your satisfaction.

In the context of the login area, Viking EMEA will use your data to evaluate your request and if applicable, assign the appropriate rights so you can benefit from additional information that is not available publicly.

6.3. Transmission to affiliated undertakings

In certain circumstances, data entered by you may be transmitted to affiliated undertakings of Viking EMEA if the thematic and regional content of your enquiry relates to the relevant affiliated undertakings. In this case also Viking EMEA remains your first point of contact and you are entitled to assert your rights against Viking EMEA.

In some circumstances, Viking EMEA may transfer the data to countries outside the European Economic Area. Viking EMEA's affiliated undertakings will, however, take the necessary steps to ensure that an appropriate level of data protection is maintained. If Viking EMEA sends your data to the United States, for example, additional measures are taken, such as concluding EU-compliant data transmission agreements with the data importer, if this is necessary.

By sending off the registration form you declare that you agree to transmission of the data entered in the registration form to undertakings affiliated with Viking EMEA if the thematic and regional content of your enquiry relates to the relevant affiliated undertakings. Further information about affiliated undertakings and their data privacy provisions is available here: <https://www.viking-emea.com/contact> . You are entitled to withdraw your consent by notifying Viking EMEA at any time. Withdrawal of consent does not prejudice the legitimacy of processing based on previous consent given prior to its revocation.

6.4. Legitimateness of the processing of personal data

The processing of the aforementioned data is legitimate under Article 6 (1) sentence 1 a), b) or f) GDPR. The data are erased as soon as they are no longer required for the purpose for which they have been collected and provided that they are not subject to any legal archiving obligations.

You can withdraw your consent to Viking EMEA for the processing or any other use of your personal data at any time. In this case, you can no longer use the Login-area. All personal data are then erased if they are not required to be retained by law and if no other legal grounds for processing the data exist.

7. Use of the training registration form

If you would like to participate in our trainings, you can register via our training registration form.

7.1. Data required for the registration

When you register for a training, you must enter your title, first and last name, and e-Mail address, company information as well as your position within the company. Furthermore, we need the participant data and

payment details. All requested participant data are mandatory. All other mandatory details are identified with an asterisk (*).

During registration, you will also have the opportunity to provide other optional information, such as your preferred communication language, mobile phone etc. Please note that such information is not required for registration and that you alone decide whether to give us these data.

The data mentioned above are needed that you can take full advantage of the Viking EMEA services as to the trainings. We also need this information, and possibly other data, in order to react to requests, questions and criticism. You are entirely free to communicate the personal data to us. If you choose not to do so, we might refuse certain services.

The following data are also stored at the time you send your request:

- Your IP address.
- The date and time at which you have made contact.

These additional personal data processed during the transmission operation are used to prevent the registration form from being misused and to ensure the security of our information technology systems. Those data will be erased after a period of seven days at the latest.

7.2. Transmission to affiliated undertakings

In certain circumstances, data entered by you may be transmitted to affiliated undertakings of Viking EMEA if the requested training relates to the relevant affiliated undertakings. In this case also Viking EMEA remains your first point of contact and you are entitled to assert your rights against Viking EMEA.

In some circumstances, Viking EMEA may transfer the data to countries outside the European Economic Area. Viking EMEA's affiliated undertakings will, however, take the necessary steps to ensure that an appropriate level of data protection is maintained. If Viking EMEA sends your data to the United States, for example, additional measures are taken, such as concluding EU-compliant data transmission agreements with the data importer, if this is necessary.

By sending off the registration form you declare that you agree to transmission of the data entered in the registration form to undertakings affiliated with Viking EMEA if the thematic and regional content of your enquiry relates to the relevant affiliated undertakings. Further information about affiliated undertakings and their data privacy provisions is available here: <https://www.viking-emea.com/contact>. You are entitled to withdraw your consent by notifying Viking EMEA at any time. Withdrawal of consent does not prejudice the legitimacy of processing based on previous consent given prior to its revocation.

7.3. Legitimateness of the processing of personal data

The processing of the aforementioned data is legitimate under Article 6 (1) sentence 1 a), b) or f) GDPR. The data are erased as soon as they are no longer required for your registration and the requested training and provided that they are not subject to any legal archiving obligations.

You can withdraw your consent to Viking EMEA for the processing or any other use of your personal data at any time. All personal data are then erased if they are not required to be retained by law and if no other legal grounds for processing the data exist.

8. Use of cookies and comparable technologies (collectively “cookies”)

8.1. General information

Whenever you use our Viking EMEA website different types of cookies are used and stored on your computer in addition to the data referred to above. Cookies are small text files which are stored on your computer or mobile device whenever you visit our Viking EMEA website. These cookies send us various types of information.

We are using cookies to make your browsing experience better, and to enable you to make the best possible use of our website.

When you visit our website, we ask for your consent to permit us to set cookies. We use the data collected by cookies for as long as required for the purpose for which they have been collected.

8.1.1. Necessary cookies

Some cookies are technically necessary to make the basic functions of the website available to you, and, therefore, they cannot be deactivated.

You will find a list of the cookies we actually use here:

Cookie	Function	Period of cookie storage
cookieconsent	Stores the setting for whether the user has agreed to the use of cookies or not.	1 year
region_code	Stores the region and language selected by the user	1 month
sessionID	A sessionID is a unique number that a website’s server assigns a specific user for the duration of that user’s visit (session). Remembers that a user is logged in and keeps a user logged in for a defined period of time.	6 days

You are in control of your data

Cookies necessary for operating the website are set. For all others, you decide for yourself which cookies you want to allow by making choices via the cookie preferences (Consent Management Platform).

8.1.2. Functional cookies

We occasionally offer services from other companies (third parties), such as YouTube or Flow player for the display of videos. If these cookies are disabled, this content cannot be displayed.

You do not have to choose those cookies. However, note that if you disable cookies and similar technologies entirely, the website may not function properly and/or the website will be less convenient to use.

8.1.3. Statistics

Statistic cookies help us to understand how you as a website visitor interact with the website, by collecting and reporting information anonymously.

These cookies may track things such as how long you spend on a site, which pages you visit or which documents you click or download, so we can continue to produce engaging content for you.

You do not have to choose those cookies.

8.2. Objection / withdrawal of consent

Cookies will be stored on your computer. You can decide whether you want to erase the cookies from your computer at any time. You can change the settings in your browser to determine yourself whether the transmission of cookies from your computer to us should be disabled, restricted or whether the cookies should be completely erased. If you disable all the cookies from our website, you may no longer be able to use all the website functions in full.

The following list provides further information about disabling cookies or managing your cookie settings in the browser which you are using:

- Safari: <http://help.apple.com/safari/mac/8.0/#/sfri11471>
- iPhone, iPad or iPod: <https://support.apple.com/en-gb/HT201265>
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Internet Explorer / Edge: <http://windows.microsoft.com/en-GB/windows-vista/Block-or-allow-cookies>
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Firefox Android: <https://support.mozilla.org/en-US/kb/block-cookies-firefox-focus-android>

You can also change your cookie settings directly on our website. If you have given consent to cookies and similar technologies, you can withdraw it at any time on our Consent Management Platform (CMP). The CMP is available in the footer of the Viking EMEA website: select "Cookie preferences", then remove the checkmark in question and click the button "Confirm selection" in order to change your settings.

8.3. Statistics | Matomo Analytics Cloud ("Matomo")

As mentioned above, statistic cookies help us to understand how you as a website visitor interact with the website, by collecting and reporting information anonymously.

These cookies may track things such as how long you spend on a site, which pages you visit or which documents you click or download, so we can continue to produce engaging content for you.

Our Viking EMEA website uses Matomo Analytics Cloud ("Matomo"), a web analytics service of Innocraft Ltd. Innocraft is based in 7 Waterloo Quay PO625, 6140 Wellington, New Zealand. Matomo makes use of cookies and finger printing technologies. Matomo data is hosted in Germany, i.e. the information about the way you use our website created by the cookie is sent to and stored on a Matomo server in Germany, but data is owned and processed by Viking.

The Viking EMEA website uses IP address anonymization. As such, your IP address is an anonymous and truncated code for us. We have no technical means of identifying you as a registered user.

The legal basis for data processing is your explicit consent according to Article 6 (1) sentence 1 a) GDPR. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website.

8.4. Functional | Google reCAPTCHA

Viking EMEA uses the reCAPTCHA service of Google Inc. ("Google") to protect the enquiry data you enter in the registration form. Google can be reached at Google Dublin, Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland. The purpose of the test is to predict whether data are being entered by a human or abusively by a processing robot. The test includes sending to Google the IP address and any other data required by Google for the reCAPTCHA service. The data you enter are therefore sent to Google which may then make further use of them. However, the IP anonymization activated by Viking EMEA on this website means that Google will first truncate your IP address in Member States of the European Union or in other state parties to the Agreement on the European Economic Area. Standard contractual clauses (SCCs) in accordance with Article 46 GDPR have been concluded as appropriate safeguards. More information regarding SCCs can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_en.

Only in exceptional cases is the full IP address sent to and truncated on a Google server in the USA. Google will only use such information on behalf of Viking EMEA to evaluate your use of this service. The IP address sent by your browser by reCAPTCHA is not combined with other data held by Google.

The use of reCAPTCHA is legitimate under Article 6 (1) sentence 1 a) GDPR provided you have given us your prior consent. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website. We use reCAPTCHA to prevent our website being misused. We will only process your data for as long as is necessary to fulfil the purpose for which they have been collected (in this case preventing misuse of our website).

More information about Google's privacy policy is available at: <https://policies.google.com/privacy?hl=en>.

8.5. Functional | OpenStreetMaps

This website uses OpenStreetMaps, a map service from OpenStreetMap Foundation ("OSMF"). OSMF can be reached at OpenStreetMap Foundation ("OSMF"), St. John's Innovation Centre, Cowley Road, Cambridge, CB4 0WS, United Kingdom (openstreetmap.org/about). This service enables us to display a map directly on our website and makes it easy for you to identify the Viking EMEA locations on a map.

When you visit a page on the Viking EMEA website on which the map service is offered, OSMF may collect information about your browser or application and your interaction with the OSMF website, including:

- (a) IP address,
- (b) browser and device type,
- (c) operating system,
- (d) referring web page,
- (e) the date and time of page visits, and
- (f) the pages accessed on their websites.

The map data is available under the Open Database License. More info: www.openstreetmap.org/copyright

The use of OpenStreetMap is legitimate under Article 6 (1) sentence 1 a) GDPR provided you have given us your prior consent. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website. If you do so, you will no longer be able to see the map.

8.6. Functional | YouTube

We use integrated contents (videos) on our website provided by www.youtube.com ("YouTube"), which is operated by Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland ("Google").

We use YouTube videos in privacy-enhanced mode. YouTube describes how it works as follows: "Privacy Enhanced Mode allows you to embed YouTube videos without using cookies that track viewing behavior. This means no activity is collected to personalize the viewing experience. Instead, video recommendations are contextual and related to the current video. Videos playing in Privacy Enhanced Mode won't influence the viewer's browsing experience on YouTube." Cookies are there-fore placed by YouTube only if you actively enable playing of an embedded video. You can find more information on the subject at: <https://support.google.com/youtube/answer/171780?hl=en#zippy=%2Cturn-on-privacy-enhanced-mode>

This means that YouTube will not store any information about the user on the website until he or she views the YouTube video. When you watch such video, a connection is made to YouTube's web servers. In this way information about which of our web pages you have visited is passed on to the YouTube server. If you are logged in as a YouTube member, YouTube will associate this information with your personal YouTube account. You can prevent this association being made by logging out of your YouTube account before visiting our website.

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Google also processes your personal data in the USA and bases that on the standard contractual clauses of the European Commission; you can find more information on this subject at: <https://policies.google.com/privacy/frameworks?hl=en>

The use of YouTube is legitimate under Article 6 (1) sentence 1 a) GDPR provided you have given us your prior consent. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website. If you do so, you will no longer be able to see video contents provided by YouTube on the Viking EMEA website.

YouTube's data privacy policy is available at <https://policies.google.com/privacy?hl=en>.

8.7. Functional | FlowPlayer

We use an embedded video player called "Flow Player" to show you video contents on our Viking EMEA website. Flow Player is a service provided by Flow player AB, Regeringsgatan 29, 5th Floor, 111 53 Stockholm, Sweden.

Flow player collects your IP address for geoblock validation and determination of country of origin as well as DOS and abuse protection.

The use of Flow Player is legitimate under Article 6 (1) sentence 1 a) GDPR provided you have given us your prior consent. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website. If you do so, you will no longer be able to see video contents on the Viking EMEA website.

8.8. Functional | HubSpot

Viking EMEA's website uses HubSpot, a marketing automation and customer relationship management platform provided by HubSpot, Inc., 25 First Street, 2nd Floor, Cambridge, MA 02141, United States ("HubSpot"). HubSpot uses cookies and similar tracking technologies to collect information about how visitors interact with our Viking EMEA website, including page views, website navigation patterns, form submissions, IP address, browser information, device type, referral sources, and interaction with website elements. When you submit a form on our website, HubSpot associates the information you provide (such as name, email address, company information) with your browsing behavior. HubSpot processes this data both within the European Economic Area and in the United States. Standard contractual clauses (SCCs) in accordance with Article 46 GDPR have been concluded as appropriate safeguards for data transfers outside the EEA.

The legal basis for using HubSpot is your explicit consent according to Article 6 (1) sentence 1 a) GDPR. You can withdraw your consent at any time with effect for the future via the "Cookie preferences" available in the footer of the Viking EMEA website. We use the data collected by HubSpot for as long as necessary to achieve our marketing and analytics purposes, typically for a period of up to 13 months for cookie data, unless you withdraw your consent earlier or we are required to retain the data longer to comply with legal obligations. More information about HubSpot's privacy practices is available at: <https://legal.hubspot.com/privacy-policy>

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9. Presence on third-party platforms

Viking EMEA runs presences on third-party platforms whose operators process and store data of their users. Viking EMEA does not have any influence on their data privacy regulations and settings. We explicitly point out that the third-party platforms also use cookies with which they can track usage behavior on other websites and apps of the group and on specific websites and in specific apps that integrate the technologies of the third-party platform in question. Information on the data collected and how they are used, the purposes for which they are stored, and how to request erasure of or information on them can be found in the privacy policy of the respective platform.

LinkedIn:

<https://privacy.linkedin.com/>

YouTube:

<https://policies.google.com/privacy?hl=en>

10. Disclosure of data to third parties

10.1. Basic principles

As a rule, we will only pass on your personal data in compliance with the applicable data protection laws to service providers, business partners, affiliated undertakings and other third parties.

We may disclose personal data to service providers working on our behalf and require them to perform services in our name (data processing agreement). These service providers may be affiliated undertakings of Viking EMEA or external service providers. In this context we comply with stringent national and European data protection regulations. These service providers are bound by our instructions and are subject to stringent contractual limitations on the processing of personal data. Accordingly, data may only be processed if this is necessary for the performance of services in our name or in order to comply with legal requirements. We stipulate precisely and in advance the rights and obligations of our service providers in relation to personal data.

We may disclose personal data to a third party if we are required to do so by law or in legal proceedings or in order to supply and manage our products and services. We may also be required to provide information to law enforcement agencies or other public authorities. We are also authorized to release data if the disclosure of information is necessary for the purposes of collaboration and thus of providing Viking EMEA services to you or if you declare your consent to such disclosure. Disclosure can also rarely be avoided in the course of tax audits.

10.2. Disclosure of your data to affiliated undertakings of Viking EMEA

Your data may also be disclosed to Viking EMEA affiliated undertakings for the purpose of processing the contact you have had with the company. A list of relevant Viking EMEA affiliated undertakings can be found here: <https://www.viking-emea.com/contact>.

All Viking EMEA affiliated undertakings are required by Viking EMEA to comply with GDPR data protection provisions and other European data protection standards (order processing).

GDPR DP0003	GDPR Process Data Privacy Policy of Viking EMEA	
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Your data are only disclosed if you have given your consent. The use of data is legitimate under Article 6 (1) sentence 1 a) GDPR provided that you have given your consent.

You may withdraw your consent from Viking EMEA at any time. Withdrawal of your consent only has effect for the future.

Your data are erased if they are no longer required to achieve the specific purpose.

10.3. Webhosting

Our website and thus your data are hosted by Kinsta Inc., 8605 Santa Monica Blvd #92581, West Hollywood, CA 90069, United States (in the following referred to as "Kinsta"). Kinsta may only use the data in accordance with our instructions (data processing agreement). Kinsta also adopts stringent technical measures to protect your personal data. Kinsta does not pass on your personal data to third parties unless this is necessary in order to perform the agreed services or if Kinsta is required to do so by law or to comply with a valid and mandatory instruction issued by a government or regulatory authority. The data provided for this purpose is kept to a minimum.

In some circumstances, Kinsta may also store the information in countries outside the European Economic Area. Kinsta will, however, take the necessary steps to ensure that an appropriate level of data protection is maintained. If Kinsta sends your data to the United States, for example, additional measures are taken, such as concluding EU-compliant data transmission agreements with the data importer if this is necessary.

The EU Standard Contractual Clauses will apply to customer data that is transferred outside the EEA, either directly or via onward transfer, to any country not recognized by the European Commission as providing an adequate level of protection for personal data (as described in the GDPR).

The processing of your data is legitimate under Article 6 (1) sentence 1 f) GDPR. The purpose of processing data is that Kinsta enables us to use Kinsta servers. We only store the data for as long as is necessary to achieve this purpose.

More information from Kinsta about data protection is available at: <https://trust.kinsta.com/>.

You can also monitor compliance with the highest security standards (including GDPR) live at the Kinsta Trust Center: <https://trust.kinsta.com/>

10.4. Technical support and implementation of the website

Technical support and website implementation are provided in cooperation with the external partner Osom Studio sp. z o.o. ("Osom Studio"). Osom Studio is based at Wólczajska 143, 90-525 Łódź, Poland. Osom Studio may only use the data in accordance with our instructions (data processing agreement). In this context, we comply with stringent national and European data protection regulations. Osom Studio is bound by our instructions and is subject to stringent contractual limitations on the processing of personal data. Accordingly, data may only be processed if this is necessary for the performance of services in our name or in order to comply with legal requirements. We stipulate precisely and in advance the rights and obligations of Osom Studio in relation to personal data. Osom Studio also adopts stringent technical measures to protect your personal data. Osom Studio does not pass on your personal data to third parties unless this is necessary in order to perform the agreed services or if Osom Studio is required to do so by law or to comply with a valid and mandatory instruction issued by a government or regulatory authority. The data provided for this purpose is kept to a minimum.

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The processing of your data is legitimate under Article 6 (1) sentence 1 f) GDPR. The purpose of data processing is that Osom Studio will have the opportunity to implement and maintain our website on an ongoing basis. We store your data for as long as is necessary to achieve this purpose.

More data protection information is available from our partner at: www.osomstudio.com

11. Security standards

Viking EMEA has implemented appropriate physical, technical and administrative security standards to protect personal data against loss, misuse, modification or destruction. Our service providers and associated undertakings are contractually committed to safeguarding the confidentiality of personal data. They are also prohibited from using data for purposes not approved by us.

12. General provisions

12.1. Adaptations

If this policy would be amended, the amended version will be made available on our website and will be applicable from your first visit following this modification. The continued use of our website following the posting of changes to this Privacy Policy will be deemed as an acceptance of these changes.

12.2. Applicable law

This policy shall be governed interpreted and executed in accordance with Luxembourgish law, to the extent permitted by law.

12.3. Agreement

By using this website, you accept all its provisions and you agree that we collect and process your personal data in accordance with this policy.

We may update this Data Privacy Policy from time to time. We therefore recommend that you regularly read this Data Privacy Policy to ensure that you are familiar with our data protection practice.

We confirm that we fully comply with the Group's policies "Minimax-Viking group", and you may review the relevant documents via the attached link (https://minimax-viking.com/de/legal_rechtliches.html)

13. IA Act (Regulation (EU) 2024/1689) / IA Using.

13.1. Use of Artificial Intelligence Tools

As part of our business, sales, marketing, and customer service activities, we may use artificial intelligence (AI) functionalities integrated into our business applications and digital platforms. In compliance with the Policies **MXVK 0009 and MXVK 0010 / MXVK 0012**

In this context, certain personal data contained within our customer relationship management (CRM / HubSpot) systems, such as business contact details, customer communications, support requests, and information relating to interactions with our services, may be analysed or processed using AI-powered features for the following purposes:

- supporting customer relationship management activities;
- improving the quality, efficiency, and responsiveness of our services;
- generating summaries, recommendations, or suggested actions;
- assisting our employees in sales, administrative, and customer support activities.

These processing activities are carried out in accordance with applicable data protection laws and only for the purposes described in this Privacy Notice. Where AI functionalities are used, appropriate technical and organizational measures are implemented to protect personal data. Any outputs generated by AI tools are subject to human review where appropriate, and AI systems are not used to make decisions producing legal or similarly significant effects on individuals without the safeguards required by applicable law.

Data subjects (e.g. customers, employees) must be informed in accordance with Articles 13 and 14 of the EU's General Protection Regulation (GDPR) when AI systems process their data.

In compliance with the AI Act (Regulation (EU) 2024/1689).