

MSC World America Contest Privacy Policy

PURPOSE OF PROCESSING

All personal information collected in relation to user participation in the MSC World America Contest (the "Contest") which is promoted on the official social media accounts of MSC Cruises SA (Instagram: @msccruisesofficial, Facebook: MSC.Cruises.International) including for the purpose of their registration to the Contest through the dedicated web page: <https://info.msccruises.com/MSC-World-America-contest.html> are processed by MSC Cruises SA in compliance with the applicable requirements of the General Data Protection Regulation Reg. (EU) 2016/679 ("GDPR").

This Privacy Policy enables you to understand how your personal data will be processed for the purposes of the participation to the Contest.

In general, any information or personal data that you provide to MSC Cruises SA will be processed in accordance with the internationally recognized principles of lawfulness, fairness, transparency, purpose limitation and retention, data minimization, accuracy, integrity and confidentiality.

The Terms & Conditions of the Contest are always available at this link: www.promoteterms.com/msc-cruises-world-america-competition-2025. All capitalized terms used in this Privacy Policy have the meanings ascribed to them in such Terms & Conditions, unless otherwise indicated.

DATA CONTROLLER

The data controller is MSC Cruises S.A. ("Controller" or "MSC Cruises"), acting through its *pro tempore* legal representative, having its registered office in Avenue Eugène Pittard 16, 1206 Geneva (Switzerland).

MSC Cruises has designated a Data Protection Officer (DPO) to deal with matters related to privacy; our DPO can be contacted at dpo@msccruises.com.

Furthermore, MSC Cruises has appointed MSC Procurement & Logistics SPA (Via Balleydier 7N 16149, Genova, Italy) as representative in the European Union.

WHAT CATEGORIES OF PERSONAL DATA DO WE COLLECT

MSC Cruises will process information about you, which may consist - should you decide to take part to the Contest - of an identifier such as your social media profile, your first name, last name and e-mail address and other information likely to make you identified or identifiable (hereinafter only "Personal Data").

More specifically MSC Cruises will be processing the following categories of Personal Data:

a. Data for Contest registration and access to the services.

When registering for the Contest, you will be required to provide certain Personal Data, such as your personal and contact information, which may include: your first name, last name, e-mail address, social media account details, phone number. Required fields are only those marked with an asterisk (*). We inform you that your personal data may be collected because you voluntarily provide it to us (e.g., when you sign up for the Contest).

b. Additional Personal Data voluntarily provided by the user

Since in the Contest registration form there are some free text fields that you can fill in, it may happen that you may provide MSC Cruises with some information, which may contain Personal Data. MSC Cruises asks you to not use these free text fields to communicate (voluntarily or involuntarily) special categories of Personal Data, i.e., data that could reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data intended to uniquely identify a natural person, data relating to a person's health or sex life or sexual orientation. MSC Cruises encourages you not to send such Personal Data unless strictly necessary. Indeed, such special categories of Personal Data may be processed only with your explicit consent and in compliance with the *pro tempore* regulations in force.

c. Third parties Personal Data

In any event, should you provide or otherwise process personal data of third parties when registering to the Contest, you warrant as of now - assuming all related liability - that this particular instance of processing is based on the consent of such third parties concerned or on another appropriate legal basis that justifies the processing of such information.

If, as part of your registration for the Contest, you communicate to MSC Cruises Personal Data referable to a minor, you guarantee as of now - assuming all related responsibility - that this particular hypothesis of processing is based on the consent of the exercising parental authority and/or the legal representative of the minor subject.

d. Browsing data

The computer systems and software procedures used to operate this web page acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified interested parties, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the computers used by users who connect to the web page, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. These data are used for the sole purpose of obtaining statistical information on the use of the web page and to check its correct functioning, to identify anomalies and/or abuses. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the Site or third parties.

e. Cookies

Please be advised that MSC SA will not serve any cookies for the purposes of the Contest. However, if you would like to know more about MSC's use of cookies, please see the Privacy Policy on MSC SA's website under section no. 7 at the following link: <https://www.msccruises.com/int/privacy>.

PROCESSING PURPOSES

MSC Cruises will be processing your Personal Data collected due to your request for participation to the Contest for the purposes indicated below:

- a. to enable you to participate in the Contest, manage the activities related to the Contest and provide any other services you request ("**Contest Management**");
- b. to fulfil legal obligations that require MSC Cruises to collect and/or further process certain types of Personal Data ("**Compliance**");
- c. to protect the rights, property or safety of MSC Cruises, our business partners, employees or customers, for example, in the context of judicial proceedings, internal investigations and investigations by competent authorities, as well as to prevent or detect any abuse that may relate to the participation in the Contest or any fraudulent activity ("**Abuse/Fraud**");
- d. to send you marketing communications, promotions and advertisements, including market research and surveys, by email, SMS, by telephone, by banner, by instant messaging, by an operator, by paper mail, and through MSC Cruises' official social media channels, regarding MSC Cruises' and third parties' products and services ("**Marketing**").

LEGAL BASIS

The legal basis used by MSC Cruises to process your Personal Data, according to the purposes stated in section above, are as follows:

- a. **Contest Management:** processing for this purpose is necessary to enable you to participate in the Contest and for the management of all activities related to the Contest in accordance with Article 6(1) letter b) of the GDPR. The provision of your Personal Data to MSC Cruises for this purpose is not mandatory, but otherwise it will not be possible for you to take part to the Contest.

- b. **Compliance:** processing for this purpose is necessary for MSC Cruises to fulfil any legal obligations under Article 6(1)(c) of the GDPR. When you provide Personal Data to MSC Cruises, it will be processed in accordance with applicable law, which may involve its storage and disclosure to the authorities for accounting, tax or other obligations
- c. **Abuse/Fraud:** the information collected for this purpose will be used solely for the purpose of preventing and/or detecting any fraudulent activity or abuse that may be related to your participation in the Contest (having criminal relevance) pursuant to Article 6(1)(f) of the GDPR.
- e. **Marketing:** the processing for this purpose is based on your consent in accordance with Article 6(1)(a) of the GDPR. You are not required to give your consent to MSC Cruises for this purpose and you are free to revoke it at any time without any consequences (other than that you will no longer receive marketing communications from MSC Cruises). You can revoke your previously given consent writing an e-mail at dpo@msccruises.com.

PROCESSING METHODS & RETENTION

The processing of your Personal Data involves their respective collection, recording, retention, modification, communication and/or deletion activities. This will be carried out either using print media, or by electronic and telematics means, in such a way as to guarantee the data's integrity and confidentiality, in accordance with the requirements set out in the GDPR.

Personal data processed for the purpose of **Contest Management** will be retained by MSC Cruises for as long as is strictly necessary to fulfil the aforementioned purpose. However, MSC Cruises may retain it for a longer period, particularly as may be necessary to protect its own interests from possible liability relating to the Contest.

Personal Data processed for the purpose of **Compliance** will be retained by MSC Cruises for the period required by specific legal obligations or applicable legislation.

Personal Data processed for the purpose of preventing **Abuse/Fraud** will be retained by MSC Cruises for the time strictly necessary for the aforementioned purpose and thus until such time as MSC Cruises is required to retain it to protect itself in court to communicate said data to the competent Authorities.

Personal Data processed for **Marketing** purposes will be retained by MSC Cruises for 24 months or until you revoke your consent if previously; you will still be asked to renew your consent periodically. Once you withdraw your consent, MSC Cruises will no longer use your Personal Data for such purposes, but may still retain it, particularly as may be necessary to protect MSC Cruises' interests from possible claims based on such processing.

Your Personal Data will not be disseminated, except for purposes directly related to the promotion of the competition, as described in the Terms & Conditions outlined above.

RECIPIENTS OF PERSONAL DATA

Your Personal Data may be shared with the entities listed below (the "Recipients"):

- Subjects who typically act as data processors such as persons, companies or professional firms that provide assistance and advice to MSC Cruises in accounting, administrative, legal, tax, financial and debt collection matters in relation to the provision of the Services, as well as those delegated to carry out certain activities related to the Contest;
- Subjects with whom it is necessary to interact for the provision of the Services (e.g. hosting providers, etc.);
- Subjects delegated to perform technical maintenance activities (including maintenance of network equipment and electronic communication networks);
- Subjects authorized by MSC Cruises to process Personal Data necessary to carry out activities closely related to the provision of the services in connection with the Contest, who have committed to confidentiality or have an appropriate legal obligation of confidentiality (e.g. MSC Cruises' employees);
- MSC Group's companies;

- Individuals, entities or authorities to whom it is mandatory to disclose your Personal Data for purposes of Compliance, Abuse or Fraud, or by order of the authorities.

TRANSFER OF PERSONAL DATA

Some of your Personal Data is shared with Recipients who may be located outside the European Economic Area. MSC Cruises ensures that the processing of your Personal Data by these Recipients is done in accordance with applicable law in compliance with Articles 44-49 GDPR. In particular, we base our data transfers on an adequacy decision, where such adequacy decision is available for the country that we are transferring data to, or otherwise on the basis of adequate safeguards, such as the Standard Contractual Clauses issued by the European Commission

More information is available from MSC Cruises by writing to the following e-mail address: dpo@msccruises.com.

RIGHTS TO ACCESS PERSONAL DATA AND OTHER RIGHTS

The GDPR provides for enhanced rights and MSC Cruises is committed to giving you the appropriate control of your own Personal Data.

In particular, you have the following rights in connection to your Personal Data:

- a) The right to access your Personal Data and obtain specific information about how we process it, in accordance with Article 15 GDPR;
- b) The right to rectify your Personal Data, in accordance with Article 16 GDPR, including by means of providing a supplementary statement;
- c) The right to obtain the erasure of Personal Data concerning you, in accordance with Article 17 GDPR;
- d) The right to obtain the restriction of the processing of your Personal Data, in accordance with Article 18 GDPR;
- e) The right to data portability, in accordance with Article 20 GDPR, where the processing is based on your consent or on your contractual relationship with MSC Cruises or one of the companies of our group, and the processing is carried out by automated means;
- f) The right to object, at any time, to the processing of the personal data concerning you, in accordance with Article 21 GDPR;
- g) The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or which similarly significantly affects you, in accordance with Article 22 GDPR;
- h) 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 him or her infringes the Regulation, in accordance with Article 77 GDPR.

Please find the list of all European Data Protection Supervisory Authorities at the following link: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

To exercise your data subject rights, please contact the Data Protection Officer at dpo@msccruises.com. Requests may also be sent in writing to MSC Cruises S.A., Avenue Eugène-Pittard 16, Geneva, Switzerland; in that case, please specify "For the Attention of the Data Protection Officer" on the envelope or please write an e-mail to: dpo@msccruises.com.