

# Privacy Policy

# Gotlandsbolaget

Version 1.0

Updated October 10 2024

# 1. Introduction

Gotlandsbolaget gives high priority to confidentiality and data security. This privacy policy applies to our processing of your personal data and establishes guidelines for the way Gotlandsbolaget processes your personal data.

This privacy policy provides you with the information that you are entitled to receive under applicable data protection laws.

You should read the privacy policy before you hand over your personal data to Gotlandsbolaget.

# 2. Data controllers and contact information

Gotlandsbolaget is made up by different companies.

The following legal entity will be data controller regarding all processing activities related to [www.gotlandsbolaget.dk](http://www.gotlandsbolaget.dk), [www.gotlandsbolaget.no](http://www.gotlandsbolaget.no) and for bookings made through DFDS concerning the Oslo-Frederikshavn-Copenhagen route (“OFC”):

**Alvina Shipping A/S**

Dampfærgevej 30  
2100 København  
Denmark

E-mail: [privacy@dfds.com](mailto:privacy@dfds.com)

The following legal entity will be data controller regarding all processing activities related to [www.gotlandsbolaget.se](http://www.gotlandsbolaget.se) and [www.gotlandsbolaget.com](http://www.gotlandsbolaget.com):

**Rederi AB Gotland**

Company-no.: 556000-8020  
Hamngatan 1, Box 1104  
621 23 Visby  
Sweden

E-mail: [rabg@gotlandsbolaget.se](mailto:rabg@gotlandsbolaget.se)

The following legal entity will be data controller regarding all processing activities related to [www.destinationgotland.se](http://www.destinationgotland.se):

**Destination Gotland AB**

Company-no.: 556038-2342  
Korsgatan2, Box 1234  
621 23 Visby  
Sweden

E-mail: [info@destinationgotland.se](mailto:info@destinationgotland.se)

Hereafter each data controller will be individually referred to as “**Gotlandsbolaget**” “**we**”, “**us**” or “**our**” in this privacy policy.

## 3. Use of your personal data

### 3.1 Cookies, pixels and social media tools

#### Types of personal data

Gotlandsbolaget uses cookies, pixels and social media tools on our websites and in this connection processes your personal data. Gotlandsbolaget may collect the following personal data about you when you visit our websites:

- IP address
- MAC address
- Session duration
- Conversion tracking
- Browsing history
- Information about your use of our websites, including click-behaviour
- Timestamp
- Button click data
- Pixel ID when Meta, LinkedIn and Google pixels are accepted

#### Purposes

Your personal data may be processed for the following purposes:

- For the websites to work
- Marketing in general, including personalization and targeted advertising
- Product and service development
- Statistics and analysis

#### Legal basis for processing

- Contractual obligations: The processing of personal data in relation to necessary cookies is based on an agreement between you and Gotlandsbolaget to be able to use the functions of the websites (Article 6(1)(b) of the GDPR).
- Legitimate interest: The processing of personal data in relation to statistical and preference cookies is based on our legitimate interest in offering you the best possible websites, products and services (Article 6(1)(f) of the GDPR).
- Consent: The processing of personal data in relation to marketing and sociale media cookies is based on your prior consent (Article 6(1)(a) of the GDPR).

**Retention period**

Data obtained through cookies are deleted in accordance with our cookie retention periods shown in the cookie popup windows.

However, the information may be stored for a longer period in anonymised form.

**Joint controllership**

When you accept social media tools (pixels) for marketing through the cookie popup window, Gotlandsbolaget may transfer information about your web browser, page location, IP address, pixel ID/cookie ID, pages visited, interests, and interaction with ads to our social media partners.

The purposes of Gotlandsbolaget's processing and transfer are to:

- Measure the effectiveness of our ads
- See if the ads are relevant to the target audience
- Deliver targeted content
- Building customer groups for marketing
- Target people with ads who have visited the website
- Target people who look like current customer

The purpose of the social media's processing of your personal data is to improve and streamline the social media's advertising platform.

For the following social media, Gotlandsbolaget, together with the social media providers, are joint data controllers for the processing of personal data collected for the purposes mentioned:

- Facebook (Meta Platforms Ireland Ltd.)
  - Facebook's privacy policy is available [here](#)
- Google Ads (Google Ireland Ltd.)
  - Google's privacy policy is available [here](#)
- LinkedIn (LinkedIn Ireland Unlimited Company)
  - LinkedIn's private policy is available [here](#)

The legal basis for Gotlandsbolaget's transfer of your personal data for these purposes is your prior consent, cf. Article 6(1)(a) of the GDPR.

## 3.2 Communication with you

**Types of personal data**

When using the contact form or the chat feature on the websites, contact customer service or otherwise communicate with us, Gotlandsbolaget processes the following categories of personal data:

- Name
- A-mail address
- Phone number
- What your inquiry is about
- Country
- Date of your inquiry
- Other information you provide in connection with your inquiry
- Recordings of pphone conversations

We encourage you not to provide sensitive personal data to us unless it is strictly necessary for the processing of your inquiry or booking.

### **Purposes**

Your personal data will be processed for the following purposes:

- Handling of your inquiry
- General communication
- Statistics and analysis
- Enter into an agreement with you
- Record phone conversations for training purposes

### **Legal basis for processing**

- Legitimate interests: We may process your personal data based on our legitimate interests in handling your inquiry, communicating with you, and developing our products and services (Article 6(1)(f) of the GDPR).
- Contractual obligations: To enter into an agreement (Article 6(1)(b) of the GDPR).
- Consent: We may obtain your consent to record phone conversations for training purposes (Article 6(1)(a) of the GDPR).

### **Retention period**

Generally, we will store your personal data for 5 years after your last contact.

Recording of phone calls will be stored for 30 days. Logs of calls are stored in 1 year.

## **3.3 Bookings**

### **Types of personal data**

Gotlandsbolaget processes personal data about you when you make a booking and purchase tickets, whether it is on the website, in the app, in telephone booking, through DFDS for the OFC route or physically in one of our terminals. Gotlandsbolaget may process the following types of your personal data:

- Name
- E-mail
- Birthdate
- Sex
- Nationality
- Address
- Identification information
- Phone number and email
- Payment details
- Information about your trip, including your tickets
- Number plate (if you book a trip with a vehicle)
- Information about whether you need special assistance when receiving our services
- Descriptions of reckless behaviour on board if you endanger the safety of other guests and/or personnel
- If you are under 16 years old and travel alone, we may obtain information regarding parent or legal guardian

We may receive your data from your travel agent and other companies involved in facilitating your trip for these parties handling your reservations and bookings and arranging your trips and purchases. For example, when you book a journey through a travel agent or an online platform, we receive your identifying data, contact details, and booking details from those third parties.

### **Purposes**

Your personal data will be processed for the following purposes:

- Fulfil our obligations to you as a customer, such as completing bookings, purchasing, invoicing and providing support
- Enable general customer service, such as answering questions and correcting incorrect information
- Statistics and analysis
- Sending service messages
- Sending satisfaction or market surveys
- Comply with applicable legislation, such as accounting laws, and shipping regulations
- To comply with internal guidelines, including exclude guests from future trips in case of reckless behaviour

### **Legal basis for processing**

- Contractual obligations: We process your personal data to enter or fulfil the agreement, handle complaints, and returns (Article 6(1)(b) of the GDPR).
- Legitimate interests: We process your personal data based on our legitimate interest in being able to improve our services, to ensure safety, comply with internal guidelines, to send traffic information and important messages (Article 6(1)(f) of the GDPR).

- Legal obligation: We may process your personal data to comply legal obligation if you have a disability or for bookkeeping purposes (Article 6(1)(c) of the GDPR).

### **Retention period**

Generally, we will store your personal data for 5 years after your last purchase or contact.

Information relating to accounting material is kept for 5 years.

Contact details of banned guests will be stored for the duration of the banned period in question.

However, we can process your personal data for a longer period in anonymised form.

## **3.4 Account holders**

### **Types of personal data**

Gotlandsbolaget processes the following categories of personal data about you when you create and use an account:

- Name
- Birthdate
- Sex
- Nationality
- Possible disability
- Address
- Phone number and email
- Payment details
- Account information

### **Purposes**

Your personal data will be processed for the following purposes:

- Administer the account ownership
- Give you the opportunity to use the benefits of the Account Holding, such as the ability to save fellow travellers, and pre-filled information
- Enable service communication with you as an Account Holder by post, email, telephone or SMS.

### **Legal basis for processing**

- Contractual obligations: We process your personal data to enter into or fulfil the agreement regarding your account (Article 6(1)(b) of the GDPR).

- Legitimate interests: We process your personal data based on our legitimate interest in being able to improve our services and the account (Article 6(1)(f) of the GDPR).

**Retention period**

If your account is inactive in 3 years.

## 3.5 Members of “my destination”

**Types of personal data**

Gotlandsbolaget processes the following categories of personal data about you when you are a member of “my destination”.

- Name
- Birthdate
- Sex
- Nationality
- Address
- Phone number and email
- IP address and information about your use of websites
- Information about which of our services or offers you have been interested in, how you interact with our newsletters

**Purposes**

Your personal data will be processed for the following purposes:

- Provide special offers
- Enable communication with you by post, email, telephone or SMS
- Enable personalized offers (profiling), marketing and event invitations via phone, mail, email and SMS/MMS

**Legal basis for processing**

- Consent: The processing of personal data in relation to “my destination” may be based on your prior consent (e.g., when forwarding direct marketing) (Article 6(1)(a) of the GDPR).
- Legitimate interest: The processing of your personal data may be based on our legitimate interest in being able to market our products and services (Article 6(1)(f) of the GDPR).

**Retention period**

As long as you are a member and a short period following termination of membership.



## 3.6 Marketing

### Types of personal data

Gotlandsbolaget processes the following categories of personal data for marketing purposes when you sign up for newsletter(s):

- E-mail
- Phone number
- Name
- Browsing behaviour (provided we have received prior consent from you, it includes your browser and device information, IP address, pages visited, clicks, and product interactions)
- History of purchases and frequency of travel (price, location, and number of products)
- History of your communication

### Purposes

Your personal data may be processed for the following purposes:

- Marketing and tailored marketing
- Analysis and statistics
- Optimizing products and services

### Legal basis for processing

- Consent: Gotlandsbolaget will only use your personal data for direct marketing, including for sending out newsletters, if you have provided a prior consent to this (Article 6(1)(a) of the GDPR).
- Legitimate interests: The processing of your personal data will, in connection with analysis and statistics as well as tailoring the newsletters, be based on our legitimate interests in being able to improve, develop our service and market our products and services (Article 6(1)(f) of the GDPR).

### Retention period

Your personal data will be stored as long as your consent to receive newsletters is active.

You can always withdraw your consent by clicking on the unsubscribe link at the bottom of each e-mail.

In addition, the information can be stored for a longer period in anonymised form.

## 3.7 Competitions

### Types of personal data

Gotlandsbolaget processes the following types of personal data if you participate in competitions:

- Name
- E-mail
- Phone number
- If you win a competition, we may also collect your address

### **Purposes**

Your personal data may be processed for the following purposes:

- Register your participation
- Draw a winner
- Forward a prize

### **Legal basis for processing**

- Legitimate interests: The legal basis for the processing of your personal data is our legitimate interest in being able to complete the competition (Article 6(1)(f) of the GDPR).

### **Retention period**

3 years after the end of the competition.

## 4 Disclosure and transfer of personal data

To achieve the above purposes, we may give third parties access to your personal data, which, based on a contractual relationship with Gotlandsbolaget, provides relevant services. This could be:

- IT suppliers
- Customer service suppliers
- Payment providers
- Providers of information dissemination
- Providers of marketing
- Booking platform providers
- Providers of statistical and analytical tools in connection with conducting surveys

Such suppliers will only process personal data in accordance with our instructions subject to data processing agreements.

In certain circumstances and under applicable law cf. Article 6(1)(c) of the GDPR or to pursue our legitimate interest in establishing or defending legal claims cf. Article 6 (1)(f) of the GDPR, it may be necessary to transfer your personal data to separate data controllers e.g. the police, lawyers, accountants, courts, other public authorities, potential buyers and other companies within the Gotlandsbolaget group. Gotlandsbolaget may also share your personal data with social media and platforms. Gotlandsbolaget and social media providers may periodically act as joint data controllers for the purpose of marketing on said media as stated above.

If your personal data are transferred to data processors or data controllers established in countries outside the EU/EEA that do not have an adequate level of protection, such a transfer will only take place once a transfer basis is secured. In addition, the transfer will be based on the EU Commission's standard contractual clauses or EU/US Privacy Framework when recipients in the USA are certified. If you have any questions about the basis for transfers to countries outside the EU/EEA, please contact us.

## 5 Your rights

You may contact Gotlandsbolaget to exercise any of the rights you are granted under applicable data protection laws, including:

### **a) Right to access and rectification**

You have the right to request copies of your personal data or ask us to rectify information you think is inaccurate. There are some exceptions, which means you may not always receive all the information we process, but generally, you can always contact us and ask for your information.

### **b) Right to deletion**

You have the right to request that we delete of your personal information in certain circumstances.

### **c) Right to restriction of processing**

You have the right to ask us to restrict the processing of your information.

### **d) Right to data portability**

You may have the right to receive your personal information in a structured, commonly used, and machine-readable format (data portability).

### **e) Right to object**

You have the right to object to the processing of your personal data. This means that you may ask us to no longer process your personal data, however, the right only applies if the "legitimate interests" ground (including profiling) constitutes the legal basis for said processing. You may object to direct marketing at any time and at no

cost to you if your personal data is processed for this purpose, which includes profiling to the extent that it is related to direct marketing. If you exercise this right, we will no longer process your personal data for such purposes.

#### **f) Withdrawal of consent**

You may withdraw your consent at any time by following the specific instructions concerning the processing for which you provided your consent. For example, you can withdraw consent by clicking the unsubscribe link in the e-mail, adjusting your communication preferences in your account (if available), or changing your smartphone settings (for mobile push notifications and location data). You may also contact Gotlandsbolaget directly to withdraw your consent.

#### **Denial or restriction of rights**

There may be conditions or limitations on these rights. It is therefore not certain you have a certain right in a specific case, as it depends on the circumstances of the processing activity. You are, however, always welcome to contact us.

## 6 Questions and complaints

If you have any questions or concerns with how we process personal data, we ask you to please let us know so that we can investigate the matter. You also have the right to file a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or to the:

- Swedish Data Protection Authority (“Integritetsskyddsmyndigheten”, “IMY”). Phone: 08-657 61 00, [imy@imy.se](mailto:imy@imy.se)

or

- Danish Data Protection Agency (“Datatilsynet”), Phone 00 45 33 19 32 00, [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk).

## 7 Changes of the privacy policy

We will continuously update this privacy policy to ensure that we provide you with as accurate information as possible, and to ensure that we comply with applicable legislation. This means that we will continuously update and change this privacy policy.

In case of significant changes, we will notify you via email if we are in possession of your e-mail. The date for the latest updates and changes will always be stated at the top of the privacy policy.