

Privacy notice on the processing of personal data

Costa Crociere S.p.A. (hereinafter also referred to as “Costa Crociere”), in its capacity as data controller, pursuant to Articles 13 and 14 of the European General Data Protection Regulation 679/2016 (hereinafter “GDPR”) and in compliance with applicable local legislation, provides the following information regarding the processing of your personal data collected by Costa Crociere and/or provided by the travel agency you contacted and/or directly communicated by you, as data subject:

1. for the booking and/or purchase of the travel package;
2. during the cruise (e.g., purchases made);
3. for browsing and/or registering on Costa Crociere’s website and/or app or for completing forms available on Costa Crociere’s website;
4. during and for the duration of your stay on board our ships.

Data controller

The data controller is Costa Crociere S.p.A., with registered office in Genoa, Piazza Piccapietra no. 48.

Data Protection Officer (DPO)

The Data Protection Officer can be contacted at: privacy@costa.it and/or at Costa Crociere S.p.A., Piazza Piccapietra 48, Genoa.

Purposes and Legal Basis of the Processing

a) Purposes related to the booking/purchase of the travel package and/or the management of your onboard experience and/or the handling of your requests. Your personal data will be processed for the purpose of fulfilling obligations arising from the contract related to the booking and/or purchase of the travel package and/or the management of your onboard experience and/or the handling of your requests, including those made via digital channels, in order to allow Costa Crociere to provide the service in an optimal manner, specifically for:

1. the conclusion, management, and execution of pre-contractual and contractual relationships between you and Costa Crociere, including during your onboard experience;
2. responding to your requests;
3. sending service notices related to the booked and/or purchased travel package (e.g., changes to contractual terms, booking information, etc.).

Additionally, among the data you may provide, there could be personal data classified as “special categories” under the GDPR (e.g., health-related data, which may be necessary to ensure services tailored to your specific needs). Such data will be processed solely for purposes related to the travel package and only with your prior consent, which constitutes the legal basis for the processing. This consent may be given by completing the specific form provided during the booking process, should you inform us of any special needs. Further information will be provided at the

time of collection of such special category data, as outlined in the “Special Needs Privacy Notice”.

b) Sending of informational and promotional communications via email related to the travel package already purchased.

The legal basis for this processing is Costa Crociere’s legitimate interest in ensuring that you receive communications regarding services and products similar to those already purchased.

You may, at any time, opt out of receiving such communications by clicking the unsubscribe link included in each communication sent by Costa Crociere.

This opt-out will not affect the sending of marketing communications described under point e) below, should you have expressly consented to them.

c) “Call Me Back” Service.

Your personal data – specifically your phone number (mandatory), and optionally your name, surname, and email – will be processed for the following purposes: i) managing the callback request received, within the time slot indicated by you, where possible; ii) performing a follow-up call in case of no response to the initial attempt. In such cases, additional attempts may be made, including outside the originally selected time slot; iii) conducting aggregated and anonymized statistical analyses regarding usage volumes, frequency, and effectiveness of the callback channel. The legal bases for this processing are Article 6(1)(b) and Article 6(1)(f) of the GDPR.

d) Sending of so-called “Cart Abandoned” emails related to services/products left in the shopping cart.

If you have not completed the purchase of the travel package and/or other services/products, your personal data will be processed to send you informational and promotional communications aimed at recovering the so-called “abandoned cart,” based on your specific request.

e) Marketing purposes of Costa Crociere and its commercial partners.

This includes promotional activities by Costa Crociere regarding its own products and/or services (so-called direct marketing), as well as third-party products from Costa’s commercial partners across various sectors (e.g., tourism activities, airlines/transport services, travel agencies, insurance, energy providers, entertainment, etc., so-called indirect marketing), carried out by Costa through both automated means (e.g., email, SMS, WhatsApp, social media ads, etc.) and non-automated means (e.g., regular mail, phone calls with an operator, etc.). Processing for marketing purposes (both direct and indirect) will only take place with your free, specific, and explicit consent, which constitutes the legal basis for such processing and may be withdrawn at any time. Therefore, the processing of your data for this purpose is entirely optional.

By consenting to receive such communications, you may be contacted through all available channels (e.g., phone and email). You may modify your contact preferences at any time by: i) accessing your personal profile (clicking “Edit Profile” and scrolling to the “Privacy” section); ii) contacting the customer service center; or iii) writing to privacy@costa.it.

f) Statistical and analytical purposes.

Your personal data will also be processed, where possible, in anonymized form, for the preparation of aggregated statistics and analysis related to Costa Crociere’s business activities. The legal basis for this processing is the legitimate interest of the company.

g) Customer Satisfaction

At various stages (e.g., after booking and/or purchasing the travel package, during your travel experience, at the end of the cruise, or following interactions with our touchpoints), Costa Crociere may send you surveys, the completion of which is entirely voluntary, aimed at assessing customer satisfaction with our services. The analysis of the collected information will be carried out, where possible, on an anonymous basis, and such information will not be used by Costa Crociere for other purposes.

The legal basis for this processing is the legitimate interest of the Company.

You may object to receiving such surveys at any time by clicking the appropriate link included in the communication or by writing to privacy@costa.it.

h) Profiling Purposes for personalized marketing activities

Your personal data may be processed using electronic tools to analyze your travel preferences and purchasing habits of services and products, including through market research (e.g., via questionnaires).

Profiling activities are intended to enable the sending of personalized communications and/or commercial offers, and/or to develop predictive models regarding Costa Crociere’s customer types, in order to better tailor commercial initiatives to customer interests, thereby enhancing the customer experience with Costa Crociere.

Profiling activities are conducted based on one or more of the following criteria (also referred to as “profiling logic”):

- analysis of purchase experience (e.g., amounts spent, time of year of purchase, types of products purchased) from the time of cruise booking to its completion, including onboard purchases, purchased packages (e.g., beverage packages), excursions, etc.;
- analysis of customer feedback on the experience, via surveys;
- composition and age of participants in the purchased travel package (e.g., solo travel, couples, young couples, senior couples);
- booking market;

- browsing data on our websites, where specific consent to related cookies has been provided (for more information, please refer to the Cookie Policy on our website).

The consequence of such profiling activities is the receipt of personalized communications and/or commercial promotions. Processing for profiling purposes will only take place with your specific and explicit consent, which constitutes the legal basis for such processing and may be withdrawn at any time. Therefore, inclusion of your data in the profiling database is entirely optional.

By consenting, you may be contacted through all available channels. You may modify your contact preferences at any time by:

1. accessing your personal profile (clicking “Edit Profile” and scrolling to the “Privacy” section);
2. contacting the customer service center; or
3. writing to privacy@costa.it.

i) Purposes related to access to the My Costa portal and the purchase of products and services available therein

This includes access via the website and/or the mobile app called “Costa App” to the My Costa portal, allowing you to access and use the services provided therein, reserved for users with an active cruise option and/or booking (e.g., purchase of wellness packages, beverage packages, excursions, Wi-Fi packages, wellness treatments, Costa-branded photos and gifts, parties, etc.).

The legal basis for this processing is the execution of your request to access My Costa, governed by the My Costa Regulation, as well as the conclusion, management, and execution of pre-contractual and contractual relationships between you and Costa Crociere via the portal.

l) Purposes related to registration and participation in the C|Club Program (the “Program”)

By registering for the Program, members will stay updated on exclusive offers and news, including through the C|Magazine, Costa Crociere’s digital magazine featuring special content, vacation ideas, and exclusive promotions for members.

Further and more detailed information about the Program is available in the “Terms and Conditions of the C|Club Program” and in the dedicated privacy notice.

m) Video and photographic recordings during the cruise

During the cruise, photos and/or video recordings may be taken by photographers on board, who contribute to making your travel experience unforgettable.

If you prefer not to be included in such recordings/photos or if you do not wish your photos to be displayed on the Photoshop boards, you may inform the Photoshop staff, who will record your preferences accordingly.

Photos featuring you will be removed only upon your request. The legal basis for this processing is the legitimate interest of the Company.

Notwithstanding the above, you may voluntarily visit designated areas on the ship where our photographers are available to take professional photos (the legal basis for this activity is the performance of a contract pursuant to Article 6(1)(b) of the GDPR).

Additionally, through a biometric recognition system, and subject to your explicit consent, you may use a dedicated service to identify your photos taken during the cruise in digital format (further information on this processing is provided in the dedicated Privacy Notice available at the relevant touchpoints).

Finally, as better described in the section “Ensuring Safety Onboard and During the Cruise,” a photo will be taken of you at embarkation for security reasons and to allow identification during the cruise. Only with your explicit consent may this photo also be used for the aforementioned biometric recognition system (further information on this processing is provided in the dedicated privacy notice available at the relevant touchpoints).

n) Ensuring Safety Onboard and During the Cruise

We have implemented a system that allows us to monitor passenger presence for safety purposes onboard and throughout the cruise, and to ensure, if necessary, more effective management of potential search and rescue operations and the safeguarding of passengers’ vital interests, in compliance with Directive 98/41/EC (as amended by Directive (EU) 2109/2017) and Legislative Decree No. 38 of 11 May 2020. In this context, please note that a photo will be taken of you at the time of embarkation to enable identification during your stay onboard. The legal bases for this processing are Article 6(1)(c) and Article 6(1)(d) of the GDPR.

For the protection of individuals, property, and infrastructure, a video surveillance system is also installed onboard our ships. This processing is based on Costa Crociere’s legitimate interest (Article 6(1)(f) of the GDPR). Video-monitored areas are clearly marked with appropriate signage.

Additionally, security personnel may be equipped with individual video surveillance devices (bodycams) that allow for the recording of images and sounds. These devices are normally inactive and are activated only in specific situations that require it, such as potentially dangerous behavior by guests, operational issues, or incidents that may compromise the safety of individuals or property.

Recordings are made exclusively to protect the safety of individuals, the security of environments, and the protection of property. The legal basis for this processing is Costa Crociere’s legitimate interest under Article 6(1)(f) of the GDPR.

o) Legal Obligations, Protection of Costa Crociere or Third Parties, Health and Safety

Your personal data, including health-related data where necessary, may also be processed for the following purposes:

1. to comply with legal obligations, regulations, national and EU legislation, and provisions issued by authorities legally empowered to do so;

2. to establish, exercise, and/or defend legal claims of Costa Crociere or third parties;
3. to provide necessary medical assistance and/or ensure safety during the cruise;
4. to provide necessary assistance in emergencies or situations requiring special support.

Nature of Data Provision and Consequences of Refusal

Providing personal data requested during the purchase of the travel package is necessary. Any refusal to provide such data, in whole or in part, may prevent Costa Crociere from completing your purchase.

Providing personal data for access to the My Costa portal is also necessary. Refusal to provide such data, in whole or in part, may prevent Costa Crociere from delivering the requested services, including the ability to book online or complete purchases via the portal.

You are free to give your specific and revocable consent at any time for the additional marketing and profiling purposes mentioned above. Failure to provide or subsequent withdrawal of consent will not affect the pursuit of the other purposes described herein.

Categories of Data Recipients

Your data will not be disclosed, except where required by law or expressly authorized by you.

Your data may be shared, exclusively for the purposes outlined above, with the following categories of recipients:

- Costa Crociere's internal staff expressly authorized to process personal data;
- Companies within the Costa Crociere corporate group, including those located abroad (Carnival Group companies include: Carnival Corporation (CCL), Carnival PLC (P&O, Cunard, Princess Asia), Costa Crociere S.p.A. (AIDA and Costa), Holland America Line N.V., general partner of Cruiseport Curacao C.V. (Holland America Line and Seabourn), Princess Cruise Lines, Ltd (Princess, Alaska, P&O Australia and Cunard), SeaVacations Limited (CCL business in UK));
- Costa Crociere's suppliers and/or contractors providing onboard and onshore services during the cruise (e.g., Port Agents, entertainment providers);
- Individuals, companies, associations, or professional firms providing assistance and consultancy services to Costa Crociere (e.g., accountants, doctors, lawyers, tax consultants, auditors, consultants for auditing or due diligence operations);
- Individuals, companies, or agencies providing marketing and analytics services or consultancy to Costa Crociere, including social media platforms (e.g., Facebook);
- Entities or companies providing support and/or services to Costa Crociere (e.g., IT services) and/or Costa Crociere's commercial partners (e.g., travel

agencies, airlines, bus companies, flight booking platform operators, as, by way of example and not limitation, Amadeus IT Group in accordance with its GDS Privacy Notice ([GDS Privacy Statement | Amadeus](#)), rail companies, service providers, payment service providers);

- Entities legally entitled to access your data under laws, regulations, or provisions issued by authorized authorities, including port authorities at disembarkation locations.

These recipients will process the data either as independent data controllers or as data processors, depending on the circumstances.

The list of recipients to whom data is disclosed may be requested from the Company or the Data Protection Officer at: privacy@costa.it or Costa Crociere S.p.A., Piazza Piccapietra, no. 48, 16121 Genoa.

Transfer of Personal Data Outside the European Union

Your personal data may be transferred abroad to third parties, whether within or outside the European Union, always for the purposes described above.

In the event of data transfer to countries outside the EU, such countries will ensure, pursuant to Articles 45 et seq. of the GDPR, an adequate level of protection based on a specific decision by the European Commission, or alternatively, the recipient will be contractually bound to protect the data at a level comparable to that provided by the GDPR.

Specifically, your data may be transferred, for example, to companies within the Costa Crociere group located in non-EU countries (e.g., the United States), to countries that are cruise destinations, to respective port authorities, or to other authorities where data disclosure is required by law or international maritime conventions.

The list of recipients to whom data is disclosed may be requested from the Company or the Data Protection Officer at: privacy@costa.it or Costa Crociere S.p.A., Piazza Piccapietra, no. 48, 16121 Genoa.

Retention of Personal Data

Personal data will be retained for no longer than is necessary to achieve the purposes for which it was collected and subsequently processed. Data will be retained for the entire duration of the contract entered into by you and for an additional period:

1. within the time limits established by applicable legislation;
2. within the time limits set by secondary regulations requiring data retention (e.g., tax declarations);
3. for the period necessary to protect the Data Controller's rights in the event of disputes related to the provision of services.

Photos/images and audio/video recordings taken during onboard events or in designated areas will be retained for 90 days after the end of the cruise and, unless you subscribe to specific services, will be deleted thereafter.

Biometric data collected for the use of the aforementioned photo identification service (to locate your cruise photos in digital format) will be retained only for the time necessary to identify the photos and will then be deleted. Further details are provided in the dedicated privacy notice available at the relevant touchpoints.

The photo taken at embarkation for security and identification purposes during your stay onboard will be deleted the day after disembarkation.

Images recorded by the video surveillance system are retained for 14 days from the time of recording, or for the period required by applicable law. After this period, unless retention is necessary for the establishment, exercise, or defense of legal claims or upon request by a competent authority, the recordings will be deleted. The same retention period applies to images and audio recordings made by bodycams used by security personnel.

Personal data processed for marketing purposes, based on your specific and explicit consent, will be retained for five (5) years if you do not complete the purchase of a Costa cruise within that time frame, or for ten (10) years if you purchase one or more cruises.

Personal data collected and processed for profiling purposes will be retained for a maximum of ten (10) years, after which it will be automatically deleted or permanently anonymized.

Data Subject Rights

At any time, pursuant to Articles 15 to 22 of the GDPR, you have the right, including in relation to profiling activities, to:

1. access your personal data;
2. request the correction of your personal data;
3. withdraw your consent to the use and disclosure of your personal data at any time;
4. request the deletion of your personal data;
5. receive your personal data in a structured, commonly used, and machine-readable format, and transmit it to another data controller;
6. object to the processing of your personal data, including for marketing or profiling purposes;
7. obtain restriction of the processing of your personal data;
8. lodge a complaint with a supervisory authority;
9. receive notification in the event of a personal data breach;
10. request information regarding:
 - the purposes of the processing;
 - the categories of personal data;
 - the recipients or categories of recipients to whom personal data has been or will be disclosed, particularly if transferred to third countries or international organizations, and the existence of appropriate safeguards;
 - the retention period of personal data;
 - if data is not collected directly from the data subject, all available information about its origin.

You may object at any time to receiving communications related to marketing and profiling activities by clicking “unsubscribe” at the bottom of the email received, by submitting a request to the contact details provided below, or by accessing your personal area on the website costacrociere.it, if you are a Costa Club member. You may exercise these rights and/or obtain further information about the processing of your personal data by sending a communication:

- via email to: privacy@costa.it
- via regular mail to: Costa Crociere S.p.A., Piazza Piccapietra 48, 16121 Genoa, addressed to the Data Protection Officer.

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