

## ROYAL CARIBBEAN PRIVACY POLICY: HEALTH PROTECTION MEASURES FOR CORONA VIRUS SUPPLEMENT

### 1. Highlights

- 1.1 **Your privacy matters.** We want you to understand how We use the personal data you provide to Us. This Health Protection Measures for Coronavirus Supplement (“Health Privacy Policy”) is intended to supplement Our Privacy Policy available on our corporate website.
- 1.2 **We collect and process data about you.** We have put in place new measures to help Us to manage the current threat to health of the Corona Virus (Covid-19), enhancing Our usual business practices. Through these new measures, we will collect and process your personal data, including certain sensitive personal data relating to your health. This will help Us to ensure the health and safety of all those onboard, including you and your travelling companions, Our employees and other third parties such as service providers. Some of the measures will also enable public authorities to control the spread of the virus.
- 1.3 **No legal obligation.** We hereby inform you, and you hereby acknowledge that in some jurisdictions the collection of such personal data is mandatory for the services We provide to manage the current threat to health of the Corona Virus (Covid-19). In other jurisdictions you have no legal obligation to provide us with such personal data, however, without the provision of such personal data, you will not be able to board Our vessels and enjoy Our services.

### 2. Who is responsible for your personal data referenced in this Privacy Notice?

- 2.1 References to “We”, “Us” or “Our” in this Privacy Policy (“Policy”) mean the data controller who is responsible for the processing of personal data referenced in this Policy. The data controller can be determined as follows:
  - (a) Subject to 2.1(c) below, Royal Caribbean Cruises Ltd. of 1050 Caribbean Way, Miami, Florida 33132, USA, (“Royal”) if you are visiting Our Royal Caribbean vessels;

- (b) Subject to 2.1(c) below, Celebrity Cruises Inc. of 1050 Caribbean Way, Miami, FL 33132, USA, ("Celebrity") if you are visiting Our Celebrity vessels; or
- (c) RCL Cruises Ltd., Building 3, The Heights, Brooklands, Weybridge, Surrey KT13 ONY, UK, if your visit to the ship is organized through RCL Cruises Ltd. or any entity based in the European Economic Area (EEA) or UK.

### 3. Health checks and health measures: What personal data We collect and how We use it

3.1 ***Health Questionnaires and Health Screening.*** Before your cruise, We may collect certain information about your age, medical history (including details of vaccinations, such as documentary proof of your Covid-19 vaccine status) and current health to make sure that you are healthy enough to cruise and to try to identify symptoms of Covid-19. We collect this information from you and We rely on your honesty. Where you provide this information for or on another's behalf you represent to us that you have that person's consent to provide us the information and process it according to Our privacy policies. We reserve the right to verify that this information, including by automated means in the case of any documentary proof of vaccination status submitted by you, is accurate and up to date. We may collect information at the point of purchase of your cruise ticket, through the online check in process, and via the app which can be used if you find that you have any Covid-19 symptoms when you are onboard. We may ask you additional questions about your health at the terminal prior to embarkation, and We may also require that you undertake a medical examination and/or provide documentation about your health, all to ensure that you are healthy enough to travel. We may also repeat some or all of these screening measures at debarkation and/or embarkation in ports of call, and at the point of debarkation at the end of your cruise.

3.2 ***Temperature Checks.*** We may test your temperature before embarkation, and we may require to take your temperature once a day when you are onboard Our ships and upon entry to onboard facilities. We may also take your temperature at debarkation and/or embarkation in ports of call. This may be by asking you to walk through a temperature scanner, or a member of staff or a service provider may take your temperature personally using a thermometer. This is to try to identify symptoms of Covid-19.

- 3.3 ***Tests for Covid-19.*** You may be required to undertake a test to identify whether you have Covid-19 or whether you have already had Covid-19 and have recovered from it. We may ask you to take this test at home, at a test centre and/or We may require that you take this test at the port before embarkation. We may also require you to take such a test when onboard. Again, these tests are used to identify people who have or who have had Covid-19, to seek to prevent spread of the virus and in order to comply with applicable laws and regulatory requirements. We or relevant government authorities may require you to undertake a COVID-19 test after the sailing. We may provide the necessary medical data (including personal identifying details) to the government authorities and health care providers as required.
- 3.4 ***Photographs, videos and other records.*** We will take photographs, videos and record other information about you while you are onboard, and during embarkation and during debarkation.
- 3.5 ***Contact Tracing: Wearables.*** We may require you to participate in our contact tracing program as a part of which you may be required to wear a wearable device at all times. This device identifies the device number of any other individual with whom you are in close contact during your cruise, and approximate information about your location onboard the ship. By 'in close contact', we mean within 2 metres or six feet of another person for a period of 15 minutes or more. If someone reports Covid-19 symptoms, the information We hold would then be analyzed to help Us identify all those other individuals with whom the reporter has been in close contact onboard, including using the processes described in section 3.6 below. We are then able to invite individuals who We identify as having been in close contact with the reporter to take the appropriate next steps, which may be to monitor their own health, remain in their stateroom for a period of time, and/or come to the medical bay for an examination or test as appropriate. We would use the information We collect from the wearables only for the purposes of preventing the spread of communicable disease. We may share anonymised data collected from the wearables with authorities to allow those authorities to understand patterns of interaction in different areas on board the ship. You may be invited to choose an enhanced product to replace the wearable and which can also operate as a SeaPass card. Additional personal data is collected by this enhanced product,

and more details will be provided as and when you are invited to use it.

- 3.6 ***Contact Tracing: Identification and Mitigation Information.*** We may also use personal data within Our system to identify those individuals who have been in close contact when we suspect that an individual may have Covid-19. As above, by 'in close contact', we mean within 2 metres or six feet of another person for a period of 15 minutes or more. This system uses information about where you have been onboard and when. We capture this information in our onboard systems, when for example, you scan your SeaPass card to purchase a drink at a café, for example, when you visit the Guest Relations desk, and when you dine in a particular restaurant. If someone reports Covid-19 symptoms, the information We hold would then be analyzed to help Us identify all those other individuals with whom they have been in close contact onboard. We are then able to invite individuals who We identify as having been in close contact with that individual to take the appropriate next steps, which may be to monitor their own health, remain in their stateroom for a period of time, and/or come to the medical bay for an examination or test as appropriate.

***CCTV Surveillance.*** We use CCTV onboard our ships for safety and security purposes such as to find missing persons, and we may now also use CCTV for contact tracing purposes. We also use enhanced software to analyse the CCTV footage using facial recognition and tools to identify characteristics such as the colour of a person's clothing. We also use information from these systems to understand guests' flows of movement around the ship, which areas on the ship are busiest (where, for example, it might become more difficult for guests to maintain a social distance) and areas where people regularly remove their masks. This allows us to ensure that our healthy sailing measures are well-informed and up to date.

#### **4. Legal basis for the processing of your personal data**

- 4.1 We collect personal data from individuals based in different territories around the world and as a result, different privacy laws apply to the personal data. We rely on different legal bases to process your personal data in accordance with applicable laws.
- 4.2 It is a condition of your cruise with Us that you acknowledge that before, during and after your cruise with Us, your personal

data will be processed as described in this privacy policy. You are deemed to have given your consent to this processing of your personal data to the extent possible under applicable data protection laws.

- 4.3 For the purposes of European and British data protection laws and regulations, We process your personal data as described in this privacy policy (i) because it is in Our legitimate interests to do so, (ii) because it is necessary for reasons of public interest in the areas of public health, including protecting against serious cross-border threats to health and ensuring high standards of quality and safety of health care, and (iii) because it is necessary for the purposes of carrying out Our obligations and exercising Our specific rights as the data controller in the field of employment law, since We are required by law to provide a safe environment in which all onboard Our ships, guests and crew, can interact without risk to their health. These three legal bases apply to each of the protocols described in section 3 of this policy.

## 5. Who we share your personal data with

- 5.1 We may share your personal data with third parties in your country of origin and in the countries of your travel destinations, as required. Those third parties include:
- (a) public authorities including in particular port authorities;
  - (b) health authorities; and
  - (c) health care providers.

Please note that the information we share with these third parties may include information collected through our health checks, including testing results. Certain third parties, particularly health authorities, may contact you in relation to that information.

- 5.2 In order to facilitate the cruise, We may also share your personal data with other companies within the Royal Caribbean Group and with Our business partners and third party service providers who assist Us in the provision and administration of the processes described in this policy and/or require such data for the services they provide for or on our behalf, including port agents, tour operators, document verification providers, and testing service providers who may support us onboard and/or at ports from time to time

## **6. How long do We retain the personal data?**

6.1 We will usually retain the specific personal data regarding Covid-19 for the shortest period possible unless we are obligated under applicable law in certain countries to retain such information for a longer term or if events related to Covid-19 have occurred during the cruise which necessitate keeping the data longer.

## **7. Your Rights**

7.1 Please note that you have various rights in relation to the personal data we hold about you, including the right to opt out of receiving direct marketing communications, the right to access or review the personal data we hold, the right to have it updated or corrected, and to have it deleted, subject to certain limitations and controls.

## **8. Transfer of your Data**

8.1 We may host, store, process, maintain or transfer personal data to various sites worldwide outside your jurisdiction (including through cloud based service providers) where the privacy laws may not be as protective as those in your jurisdiction. By booking a cruise, you hereby provide your consent to the use and/or processing and/or hosting, storage and/or transfer of your personal data to countries outside your jurisdiction. Please note that much of the personal data we collect is processed in the United States. Where specific laws or regulations relating to data transfer apply to the transfer of data, we seek to ensure that the personal data is protected and transferred in a manner consistent with legal requirements.

## **9. Further information**

9.1 If you have questions regarding the use of personal data referenced in this Privacy Notice, you may contact Our data protection officer at [privacy@rccl.com](mailto:privacy@rccl.com).

**For further information regarding the use of personal data, please see Our Privacy Policy available on Our corporate website and can be found here <https://www.royalcaribbean.com/resources/privacy-policy>**