



COVID-19 PRIVACY NOTICE

VIKING RIVER CRUISES, INC., AND VIKING RIVER CRUISES UK LIMITED

WHAT IS THE PURPOSE & SCOPE OF THIS DOCUMENT?

This COVID-19 Privacy Notice ("**Notice**") describes how Viking River Cruises UK, Ltd. ("**Viking UK**") and Viking River Cruises, Inc. ("**Viking US**") use personal information in the context of our response to the COVID-19 pandemic and the administration of our COVID-19 Health and Safety Program/Programme and our COVID-19 Policies and Procedures (collectively, the "**Program**" or the "**Programme**"). You can learn more about the Program/Programme by visiting www.vikingcruises.com/oceans/my-trip/health-and-safety/health-and-safety-program.html, and our COVID-19 Policies and Procedures by visiting www.viking.com/healthandsafetyprogram for US and Canadian guests or www.vikingcruises.co.uk/healthandsafetyprogramme for UK guests. When we refer to "**using**" or "**processing**" your personal information we mean any use, from creating, recording or collecting it from someone else, through to its destruction, and all uses in between.

If you are a US resident and you booked with Viking US for travel outside the UK or EEA, Viking US is responsible for your personal information and its use for the Program/Programme under US law. If you booked with Viking UK, or your cruise includes UK or EEA locations, Viking UK will be a controller under UK law in relation to your personal information for the purposes of the Program/Programme, even if you are a US resident. Each of Viking UK and Viking US is separately and independently responsible for its data collection and handling practices, as described in this Notice. References to "we," "us," and "our" should be interpreted to refer to the applicable Viking entity. This Notice only applies to our relationship with you in the context of the Program/Programme. Our other privacy policies and notices that have been provided to you separately, including our Privacy Policy (www.vikingcruises.com/privacy-policy/index.html), will apply to other aspects of our relationship. We may update this Notice from time to time.

SOURCES FROM WHICH WE OBTAIN INFORMATION ABOUT YOU FOR THE PROGRAM/PROGRAMME

As part of our ongoing efforts to maintain the health and safety of our guests and crew, we use various types of personal information about you. We obtain this information:

- Directly from you (e.g., through a health screening questionnaire).
- In connection with screening procedures (e.g., results of temperature checks and Polymerase Chain Reaction (PCR) tests).
- From another person or entity (e.g., if you authorize/authorise a medical provider to share information with us).
- Through the use of technology (e.g., wearable devices that you may be required to wear throughout the cruise, mobile phone apps where you consent to the app sharing information with us, and thermal imaging systems in use on the ship). *See important additional information about this, below.*

Temperatures will be measured continuously on board through a system of cameras equipped with infrared thermal sensors. These thermal cameras have face recognition capabilities and will measure the temperature of any individual approaching the reception desk. Additionally, each guest will be assigned a small device at embarkation that must be worn throughout the cruise. This device will facilitate contact tracing for all guests on and off the ship. Data will be stored by guest ID number and will only be accessed if there is a suspected or confirmed COVID case.

THE KIND OF INFORMATION WE OBTAIN ABOUT YOU UNDER THIS NOTICE

In an effort to provide a safe and healthy environment on our ships and as part of our booking terms, we use various categories of information from and about you so that we may administer the Program/Programme and contact you for related purposes. The kinds of information we obtain about you may include, where applicable:

- Demographic information such as name, phone number, address and gender;
- Information regarding potential exposure to COVID-19;
- Information about potential symptoms;
- Information about pre-existing conditions or heightened health risk factors;
- Information about a diagnosis of COVID-19 or your vaccination status (*see important information about vaccination requirements, below*), where you have disclosed this to us, or where we have obtained it based on your separate authorization; and
- Information about compliance or failure to comply with COVID-19 safety guidelines.

INFORMATION OBTAINED ABOUT COVID-19 VACCINATION STATUS

As part of the Program/Programme, you are required to provide proof that you have received a COVID-19 vaccine approved for administration in your country of residence at least two weeks prior to embarkation (for two-dose vaccines, you must provide proof that you have received both doses). You may be given the option to upload proof of vaccination status via the www.MyVikingJourney.com website.

You may also be able to provide proof of vaccination status via a third-party mobile application. Generally, such applications allow you to access your health record, including your vaccination status, and to consent to sharing information about your vaccination status with third parties like Viking.

If you use such an application, note that for purposes of data protection laws, the application provider is the controller of information used by the application. Before using any such third-party application, you should familiarize/familiarise yourself with its privacy policy.

OUR PURPOSE FOR USING YOUR PERSONAL INFORMATION OBTAINED UNDER THIS NOTICE

We will use the above information to help protect the health and safety of our guests and crew (for example, by restricting potentially infectious, non-compliant or uninfected individuals) from accessing common areas on board the ship or participating in shore excursions or providing notice of potential health or safety issues identified through contact tracing); to conduct operational activities (e.g., to organize/organise COVID-19 testing and monitor testing progress and capacity, or to conduct risk or trend analysis); to comply with (our legal obligations; to exercise or defend legal claims; and (if applicable, and necessary) to seek to protect you in life-or-death situations.

Our legal bases for using your personal information are the legitimate interests of Viking and its group companies in conducting the Program/Programme to help safeguard the health and safety of our guest and crew, and in performing or enforcing contracts that Viking or its group companies are party to; compliance with our legal obligations, which include health and safety obligations; and, in life-and-death situations, your vital interests.

The personal information that we use will include information about your health. Law in the UK, the EU, and other jurisdictions permits us to use the information for reasons of public interest in the area of public health in order to protect against serious cross-border threats to health, or (where applicable) to exercise or defend legal claims or to protect the vital interests of any individual in a life-or-death situation.

WHO YOUR PERSONAL INFORMATION WILL BE DISCLOSED TO UNDER THIS NOTICE

We will disclose your personal information to the following types of entities (where applicable):

- We share your personal information with other companies in the Viking group of companies.
- We share your personal information with people within Viking and the companies within the Viking group of companies who have a “need to know” that information to carry out the purposes described in this Notice. This includes, as applicable, relevant personnel within Viking (such as COVID-19 compliance personnel).
- We share personal information with government health agencies or other entities as required by law or regulation, or if compelled to do so by judicial or administrative process. For example, we will share personal information as required by local law or regulation with authorities at each port of call where passengers may disembark.
- **If you test positive for COVID-19**, we may conduct **contact tracing** to identify and warn individuals with whom you have had contact while infectious. With your separate consent, unless otherwise required by applicable law, we may disclose your name and COVID-19 positive status to those individuals, in order to alert them of the need to take steps to protect themselves and others.
- Where appropriate, we share certain personal information with authorized/authorised third-party **service providers**, such as website hosting providers, PCR test administrators, healthcare providers, lodging providers (e.g., hotels), security providers, and insurers.
- We may disclose your personal information to a **provider of healthcare** to facilitate the ordering and administration of COVID-19 tests or test results, or to aid any treatment or diagnosis of you where you are unable to authorize/authorise the disclosure.
- **We may disclose personal information to vendors that administer COVID-19 PCR tests on our behalf.** The types of personal data processed by such vendors may include pseudonymised bar codes associated with COVID-19 testing samples, sex, birth date, COVID-19 test results, and other data required in order for testing laboratories to fulfill their obligations to report to national authorities.
- We may share your information with lawyers, other professional or medical advisers, mediators, arbitrators, courts, regulators, and other relevant parties if relevant in a **lawsuit, arbitration, grievance, or other claim or challenge** to which you and Viking are parties and where your physical health may be at issue.

MEASURES WE TAKE TO PROTECT YOUR PERSONAL INFORMATION

We maintain organizational/organisational, technical, and physical safeguards to help protect the information we use. These safeguards vary depending upon a variety of factors including the sensitivity of the information. Despite all reasonable practices, no security method is infallible.

WE MAY TRANSFER YOUR PERSONAL INFORMATION TO OTHER COUNTRIES

In some cases, we will transfer your personal information to an overseas location for the purposes of the Program. If you are an EEA or UK citizen, Viking UK can transfer your personal information to countries that have “adequate” safeguards for personal information, as determined by the European Commission or the UK’s Information Commissioner, as applicable.

If your intended cruise destination(s) is/are outside the European Economic Area, the relevant state(s) may not provide adequate safeguards. Viking UK can lawfully make transfers of your personal information to countries that have not been classified as having adequate safeguards if appropriate contractual measures are in place between Viking UK and the recipient or if we have your explicit consent to the transfer. Viking UK has contractual measures in place between it and Viking group companies in the US which safeguard the transfer of your personal information, from the UK to the US. You can contact data.protection@vikingcruises.com if you would like a copy of the safeguards.

If we ask you for your explicit consent to a transfer, we may be unable to make the necessary transfer (s) of your personal information unless we receive your consent. This may impact on our ability to progress the booking for you or your guests, and it may result in you being denied entry to your intended cruise destination(s),

EXERCISING DATA RIGHTS

Under certain circumstances, in certain jurisdictions you may have the legal right to:

- Request **access** to your personal information. This would enable you, among other rights, to receive a copy of the personal information that we hold about you;
- Request **correction** of the personal information that we hold about you. This would, among other rights, enable you to have any incomplete or inaccurate information we hold about you corrected;
- Request **erasure** of your personal information. This would enable you, among other rights, to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You may also have the right to ask us to delete or remove your personal information where you have exercised your right to object (see below or in limited other circumstances);
- **Object** to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to our use of your personal information on this ground;
- Request the **restriction** of processing of your personal information. This would enable you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing;
- Request the **transfer** of certain personal information to another party; and
- **Withhold or withdraw** your consent for the processing of your personal information, if we rely on consent as our legal basis for using your personal information;
- Complain to your local regulator of data protection. In the UK it is the Information Commissioner. Each member state of the EU and the EEA has its own regulator. We hope that you will contact us first to give us a chance to resolve your concerns.

If you would like to exercise any of your data rights, or if you have any questions or concerns about how we have used your personal information, please contact the applicable controller using the information provided below.

RETAINING YOUR PERSONAL INFORMATION

We will keep your personal information for as long as is necessary to administer the Program/Programme and in accordance with legal standards applicable to the information. We aim to delete information of guests who do not receive a positive test result or experience COVID-19 symptoms during the voyage within a reasonable time following the applicable COVID-19 incubation period. We may retain information of other guests for longer periods as necessary to fulfill the purposes described in this Notice.

Viking River Cruises, Inc. Contact Details

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Viking River Cruises UK, Ltd. Contact Details

- data.protection@vikingcruises.com
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