

## **Privacy Policy**

Protecting your private information is our priority. This Statement of Privacy applies to Habacoa, Porto Habacoa Marina, (together the Project) and its developer, Habacoa Holdings, Ltd. (“Habacoa”) and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to Habacoa include. [www.habacoa.com](http://www.habacoa.com), [www.portohabacoa.com](http://www.portohabacoa.com) and the Project. Habacoa’s website, [www.habacoa.com](http://www.habacoa.com), and [www.portohabacoa.com](http://www.portohabacoa.com) (the Site) is an Informational site. By using the Site, you consent to the data practices described in this statement.

### **Collection of your Personal Information**

In order to better provide you with the products and services offered, Habacoa may collect personally identifiable information, such as your:

- First and Last Name
- Mailing Address
- E-mail Address
- Phone Number
- Name of the yacht
- Other

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to use certain products or services. These may include: (a) registering for an account; (b) signing up for special offers; (c) sending us an email message. To wit, we will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. We also may gather additional personal or non-personal information in the future.

### **Use of your Personal Information**

Habacoa collects and uses your personal information to operate and deliver the product and/or services you have requested.

Habacoa may also use your personally identifiable information to inform you of other products or services available from Habacoa and its affiliates.

### **Sharing Information with Third Parties**

Habacoa does not sell, rent or lease its customer lists to third parties.

Habacoa may share data only with trusted partners and only in order to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to Habacoa, and they are required to maintain the confidentiality of your information.

Habacoa may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or

comply with legal process served on Habacoa or the Site; (b) protect and defend the rights or property of Habacoa; and/or (c) act under exigent circumstances to protect the personal safety of users of Habacoa, or the public.

### **Automatically Collected Information**

Information about your computer hardware and software may be automatically collected by Habacoa. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Habacoa website.

### **Right to Deletion**

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not be able to comply with requests to delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- exercise rights provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

### **Children Under Thirteen**

Habacoa does not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this website.

### **E-mail Communications**

From time to time, Habacoa may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. In order to improve our Services, we may receive a notification when you open an email from Habacoa or click on a link therein.

If you would like to stop receiving marketing or promotional communications via email from Habacoa, you may opt out of such communications by Emailing "unsubscribe" subject line to [management@habacoa.com](mailto:management@habacoa.com).

### **Changes to this Statement**

Habacoa reserves the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our website, and/or by updating any privacy information. Your continued use of the website and/or Services available after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.

### **Contact Information**

Habacoa welcomes your questions or comments regarding this Statement of Privacy. If you believe that Habacoa has not adhered to this Statement, please contact Habacoa at:

Habacoa Holdings, Ltd  
c/o MP Law Chambers  
100 Mt. Royal Ave.  
Nassau, Bahamas

Email

[management@habacoa.com](mailto:management@habacoa.com)

Address:

Effective as of October 4, 2023