Starboard Holdings Ltd., Inc. Privacy Policy

*Last Updated: [*11/04/2025*]*

1. Our Commitment to Privacy

Your privacy is important to us at Starboard Holdings Ltd. ("Company," "Starboard," "we," "us," or "our"), and we are committed to safeguarding, preserving, and respecting your privacy rights. This Privacy Policy describes how we collect, use, disclose, and secure the personal information we gather about you through our website, https://www.starboardretailgroup.com/ (the "Website") and when you interact with us as a customer or potential customer, or as an entrant in any promotional activity, including any sweepstakes we may offer from time to time (collectively, the "Services"). It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

For purposes of this Privacy Policy, personal information means data that classifies as personal information, personal data, personally identifiable information, or similar terms under applicable data privacy and security laws and regulations. It does not include data excluded or exempted from those laws and regulations, such as deidentified, anonymized, or aggregated data.

You should read this Privacy Policy carefully. If you do not agree to this Privacy Policy, you may not use the Services.

This Privacy Policy applies regardless of how the Services are accessed and will cover any technologies or devices by which the Company makes the Services available to you.

If you have any questions or concerns about our personal information policies or practices, you can contact us via the methods described in the "**How to Contact Us**" section below.

2. The Information We Collect and How

We collect information you voluntarily provide to us directly, information that we collect automatically when you interact with the Services, and information that third parties and service providers collect on our behalf in order for you to access our Services. The categories of personal information that we collect and the purposes for which we collect that information are described below.

Categories of Personal Information We Collect

The following list describes the categories of personal information we collect when you use our Services.

- *Identifiers and Personal Information.* If you use our Services, we will collect the information you voluntarily provide to us. The information may vary depending on the services you request but may include your name, phone number, email address, mailing address, cruise information (including cruise line number, cruise dates, and stateroom information), signatures, information about goods or services

you are interested in purchasing or have purchased, and the contents of any communications that you may send to us throughout our relationship.

- *Commercial Information.* Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, including, but not limited to in-person purchases aboard a cruise and participation in events, promotional activities and sweepstakes we sponsor or co-sponsor.

- *Analytics Information.* We collect certain analytics information automatically as you navigate our Services. This includes cookies, tracking pixels, tags or similar tools. For more information, please view the "**How Do We Use "Cookies" and Other Tracking Technologies?**" section below.

- *Email or Contacting Us.* If you send us an email or otherwise contact us, we will collect your email address and any information that you provide in the email.

- *Payment Information.* We may collect payment information from you, such as name, address, phone number, and debit or credit card information when you make a purchase through our Services. Please note that we may use payment service providers, to process your payments.

- *Social Media.* If you interact with our Services by sharing or posting on a social media website, we may collect information that you post. Please note that your comments will be visible to the public, so you should never share personal information that you would like to keep private.

- *Job Applications and Employment.* If you apply for a job with or are employed or contracted by us, we will collect various pieces of information about you to administer the employment relationship, provide benefits, and ensure security. Such information will vary depending on your role, but it would likely include name, social security number, educational information, and financial account information.

- *Inference.* Inferences drawn from personal information identified in this privacy policy to create a profile about you to reflect your preferences.

- *Sensitive Personal Information.* Starboard only collects sensitive personal information, as defined by applicable privacy laws, for the purposes allowed by law or with your consent. Starboard does not collect or process sensitive personal information for the purpose of inferring characteristics about you.

- *Sensory Data*. We may collect audio or electronic information.

Information We Collect as You Navigate Our Services

We automatically collect certain information as you use the Services, such as the following:

- *Usage Information.* We may collect information automatically through your use of the Website, such as which of the pages on the Website you access, the frequency of access, and how long you spend on our Website.

- *Device Information.* We may collect information about the device you are using, such as hardware model, operating system, application version number, browser, and IP addresses.

- *Mobile Device Information.* In addition to the Device Information listed above, when you access our Website via a browser on your mobile device, we may collect mobile network information, including telephone number, the unique device identifier assigned to that device, mobile carrier, operating system, and other device attributes.

- *Location Information.* We may collect information about your actual location, which may be determined from GPS and other sensors that may reveal information on or nearby devices, Wi-Fi access points, and cell towers.

Additional Sources

We may also collect your personal information from the following sources:

- *Information Provided by Others.* We may collect information about you indirectly from your friends, family, or others as they interact with our Services on your behalf, such as by booking a cruise on which you will travel.

- *Using Cookies and Other Tracking Technologies.* When you visit our Website, use our Services, open or click on emails we send you, or interact with our marketing materials and/or advertisements, we or third parties we work with automatically collect certain information using online tracking technologies such as pixels, web beacons, software developer kits, third-party libraries, and cookies. For more information, please see "3.How Do We Use "Cookies" and Other Tracking Technologies?" section below.

3. How Do We Use "Cookies" and Other Tracking Technologies?

We may send one or more Cookies to your computer or other device. We may also use other similar technologies such as tracking pixels, tags, or similar tools when you visit our Services.

Cookies are small files created by websites, including our Services, that reside on your computer's hard drive and that store information about your use of a particular website. When you access our Services, we use Cookies and other tracking technologies to:

- Estimate our audience size and usage patterns;

- Store information about your preferences, allowing us to customize our Services according to your individual needs;
- Contact you to provide you with information or services that you request from us;
- Advertise new content, events, and services that relate to your interests;
- Provide you with more personalized content that is most relevant to your interest areas; and
- Recognize when you return to our Services.

You can manage your Cookies preference as described in the **"Managing Your Cookies**" section below.

What Types of Cookies Do We Use and Why?

The following chart lists the different types of cookies that we and our service providers use on the Services. Because the specific cookies we use may vary over time, as well as differ by the specific page you are browsing, the below chart is illustrative only.

Types of Cookies	**Purpose**	**Who Serves (for example)**
Essential	These Cookies are required for the operation of the Services and enable you to move around the Services and use its features. Disabling these Cookies can negatively impact the performance of Services.	• Google
Analytics, Performance, and Research	These Cookies, beacons, and pixels allow us to analyze activities on the Services. They can be used to improve the functioning of the Services. For example, these Cookies recognize and count the number of visitors and see how they move around the Services. Analytics Cookies also help us measure the performance of our advertising campaigns to help us improve them and to optimize the content on the Services for those who engage with our advertising.	• Google

We do not use any cookies, pixels, or other tracking that discloses to any third party information that identifies a person as having viewed specific video materials. We also have enabled restricted data processing for Google Tag on our website.

Please note that if you interact with our Services through a third party application, the third party may use different or additional cookies than those used by Starboard. We recommend that you

carefully review the privacy disclosures provided by any third parties whose applications you may use to interact with our services.

How Long Do Cookies Stay on My Device?

Some Cookies operate from the time you visit the Services until the end of that particular browsing session. These Cookies, which are called "Session Cookies," expire and are automatically deleted when you close your Internet browser.

Some Cookies will stay on your device between browsing sessions and will not expire or automatically delete when you close your Internet browser. These Cookies are called "Persistent Cookies" and the length of time they will remain on your device will vary from Cookie to Cookie. Persistent Cookies are used for a number of purposes, such as storing your preferences so that they are available for your next visit and to keep a more accurate account of how often you visit the Services, how your use of the Services may change over time, and the effectiveness of advertising efforts.

Managing Your Cookies

It may be possible to block Cookies by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including Essential Cookies), you may not be able to access all or parts of the Services.

You can find out more about Cookies and how to manage them by visiting www.AboutCookies.org.

Does the Site Respond to "Do Not Track" Signals?

At this time, our Website does not respond differently based on a user's Do Not Track signal.

4. How We Use Personal Information

We use personal information we collect about you or that you provide to us in the following ways:

- To present our Services and their contents in a suitable and effective manner for you and your device;
- To contact you to provide you with information or services that you request from us;
- To advertise services or campaigns that we think may be of interest to you;
- To provide customer support, troubleshoot issues, manage accounts, and respond to requests, questions, or comments;
- To respond to your requests for Services, such as fulling request for an order for purchase;

- To comply with our legal obligations and enforce our rights arising from any contracts;
- To notify you about any additions, upgrades, or changes in our services;
- To send you information relating to other programs, services, products, promotions, and events that we believe may be of interest to you;
- To further business operations and protections of business interests and security;
- To personalize your experience on our Website or mobile apps; and
- To respond to employment related requests and communications.

5. How We Disclose the Personal Information We Collect

We have disclosed the following personal information about consumers for business purposes:

- We disclose identifiers, personal information, commercial information, analytics information, email information, payment information, social media, geolocation, sensory information to service providers, who are essential to our provision of Services.
- We disclose content posted on our social media platforms (e.g., if a consumer comments" on a story) with other consumers. Such posts may include personal information categorized as identifiers and personal, but the content depends on the individual post.
- We disclose your personal information categorized as identifiers, to verify customer data, such as mailing addresses.
- We shall disclose your personal information in all categories as part of a corporate business transactions, such as a merger, acquisition, joint venture, or financing or sale of company assets, and information is transferred to a third party as one of the business assets in such a transaction.
- We disclose personal information to vendors and business partners so that they can provide services to you or market products, information, campaigns, or services to you.
- We disclose personal information to our affiliated and related companies to manage customer and prospect relationships and for other business and commercial purposes consistent with how we use personal information as described above in this Privacy Policy.
- We disclose personal information if we believe that doing so is necessary or appropriate to (1) comply with law, regulations, legal process or governmental

request, (2) enforce any agreement relating to the Website or our Services, including potential violations, (3) detect, prevent or otherwise address fraud, security or technical issues, or (4) otherwise protect the rights, property or personal safety of Starboard, our employees, our customers, Website users, or others.

We do not sell or share (as defined in applicable privacy laws) your personal information.

We do not have actual knowledge that we sell or share the personal information of consumers under 16 years of age.

6. Advertising and Marketing Choice

If you do not want to receive marketing communications or would like to understand more about other unsubscribe options, please contact us as set out in the "**How to Contact Us**" section below.

For marketing email communications, you can opt-out and/or manage your preferences by clicking on the unsubscribe link provided at the bottom of any email you receive from us. If we call you with information that you do not want to receive, you can advise us of this during the telephone call.

7. United States Privacy Rights

Depending on your state of residence, you may have certain rights with respect to the collection, use, transfer, and processing of your Personal Information. We reserve the right to limit these rights wherever permitted under applicable law, including where your identity cannot be reasonably verified or to the extent your rights adversely affect the rights and freedoms of others.

To exercise any of the rights below, please contact us via the contact information below.

Retention of Your Personal Information

We retain your personal information for the duration of your relationship with us and for as long as it is required to satisfy the purpose of collection. We may also retain your Personal Information for a limited duration thereafter to satisfy legal and recordkeeping requirements.

Individual Rights

Right to Know About Personal Information Collected, Disclosed, or Sold (if Applicable)

You have the right to request that Starboard disclose the Personal Information it collects, uses, and discloses about you to third parties. There are two types of Rights to Know requests that you can make:

1. Right to Know (Abbreviated Request): If you make a Right to Know (Abbreviated Request), you will receive the following information about you:

a. Categories of Personal Information collected, sold, or shared;
b. Categories of sources from which Personal Information is collected;
c. Categories of third parties to whom sold, shared, or disclosed;
d. Business or commercial purpose for collecting, sharing, or selling Personal Information; and
e. Categories of Personal Information disclosed for a business purpose and categories of persons to whom it was disclosed for a business purpose.

2. Right to Know (Specific Pieces of Information Request): If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:

    a. Specific pieces of Personal Information collected about you.

This information will be provided to you free of charge, unless Starboard determines that your request is manifestly unfounded or excessive. Depending on your state of residence, you may request for a copy of the information up to twice per year per customer.

There are certain exceptions to a consumer's Right to Know. Starboard will state in its response if an exception applies.

Right of Deletion

You have the right to request that Starboard and our service providers delete any Personal Information about yourself that Starboard has collected from you upon receipt of a verifiable request. This right is subject to certain exceptions. Starboard will state in its response if an exception applies.

Right of Correction

If we maintain inaccurate Personal Information about you, then you have the right to request that we correct the inaccurate Personal Information upon receipt of a verifiable request. The right of correction is subject to certain exceptions. Starboard will state in its response if an exception applies.

Right to Opt-Out of the Sale of Personal Information (if Applicable)

You have the right to opt-out of the sale of your Personal Information by a business subject to certain laws and regulations. As stated above, Starboard does not sell or share your personal information as these terms are defined under California law.

Right to Non-Discrimination

You have the right not to receive discriminatory treatment for exercising the privacy rights. Starboard will not discriminate against you because you exercised any of your privacy rights, including, but not limited to, by: denying goods or services to you; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting that

you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Right to Limit Use and Disclosure of Sensitive Personal Information

Starboard only collects Sensitive Personal Information, as defined by applicable privacy laws, for the purposes allowed by law or with your consent. Starboard does not collect or process sensitive personal information for the purpose of inferring characteristics about you. Should this change, Starboard shall provide you with notice and a means for opting out of such uses.

Submitting Requests

You can submit your request by contacting us at datareguests@starboardcruise.com.

Verifying Requests

Starboard provides consumers with an email address datarequests@starboardcruise.com to submit requests. To fulfill requests, Starboard must verify the identity of the person submitting the request. To do so, we may request up to three pieces of personal information about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury from the consumer whose personal information is the subject of the request.

Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in your request to verify your identity and will delete any information you provide after processing the request. Starboard reserves the right to take additional steps as necessary to verify the identity of consumers where we have reason to believe a request is fraudulent.

Authorized Agents

Depending on your state of residence, you may designate an Authorized Agent to submit a request on your behalf to access or delete your Personal Information. If you choose to use an Authorized Agent, Starboard requires that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with Starboard. Failure to do so may result in Starboard denying your request. We may deny a request from an Authorized Agent that does not submit proof that they have been authorized by you to act on your behalf.

Appealing Requests

Depending on your state of residence in the U.S., you may be able to appeal our decision to your request regarding your personal information. To do so, please contact us in any of the ways listed

in the " How to Contact Us " section. We respond to all appeal requests as soon as we reasonably can, and no later than legally required.

Contact for More Information

If you have any questions or concerns regarding your consumer Privacy Rights under this Privacy Policy, you may contact us by email at datarequests@starboardcruise.com, or in accordance with the "**How to Contact Us**" section, below.

8. Notice to European Residents

Lawful Bases for Processing

If you are located in the European Union ("EU"), a European Economic Area member state ("EEA"), the United Kingdom ("UK"), or Switzerland, we process your personal information on one or more of the following legal bases, as permitted under applicable privacy laws: (i) where you have provided your consent which can be withdrawn at any time; (ii) where the processing is necessary for the performance of a contract with you, or to take steps at your request before entering into a contract; (iii) where we are required to comply with a legal obligation; or (iv) where the processing is necessary for our legitimate interests (or those of a third party), provided that such interests are not overridden by your interests or fundamental rights and freedoms.

Your Rights

In certain circumstances you have rights under applicable privacy laws in relation to your personal information that we hold about you - specifically:

- *Request access to your personal information*. You may have the right to request access to any personal information we hold about you as well as related information.
- *Request correction of your personal information*. You may have the right to obtain the rectification of any inaccurate personal information we hold about you.
- *Request erasure of your personal information*. You may have the right to request that personal information held about you be deleted.
- *Request restriction of processing your personal information*. You may have the right to prevent or restrict processing of your personal information.
- *Request transfer of your personal information*. You may have the right to request transfer of your personal information directly to a third party where this is technically feasible.

If you believe that we have not fulfilled our obligations under applicable privacy laws, we encourage you to contact us in the first instance so that we can work to resolve your concerns.

However, you also have the right to lodge a complaint with your local data protection authority, such as the UK Information Commissioner's Office (ICO).

You can exercise any of these rights by contacting us using the details under "How to Contacting Us" below.

9. Links to other Websites

The Website may contain links to other websites. When the company provides links, it does so only as a convenience and does not endorse any products or services and is not responsible for any content of any third-party website or any links contained within. It is important to note that this Privacy Policy only applies to this Website and the Services described herein We are not responsible and assume no responsibility for any personal information collected, stored, or used by any third party as a result of you visiting other website. We also advise that you read the privacy notice of any third-party websites you choose to visit carefully.

10. How Long Is Your Personal Information Kept

The Company retains your personal information to the extent it is necessary for the purpose for which it was collected. The Company will delete your personal information when it is no longer necessary for the purpose for which it was collected, or upon your request, subject to exceptions as discussed in this Privacy Policy or under applicable law, contract, or regulation.

11. Our Commitment to Data Security

The security of your personal information is important to us. We take various reasonable organizational and technical measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction. If required by law to do so, we will notify you and/or the relevant supervisory authority in the event of a data breach.

However, we cannot and do not guarantee complete security, as it does not exist on the Internet.

12. Our Commitment To Children's Privacy

Protecting the privacy of the very young is especially important. Although parents may enter information about their children, this Website is not intended for children under 16 years of age, and we do not knowingly collect personal information from children under 16. In the event that we learn that we have collected personal information from a child under age 16 without verification or parental consent, we will immediately delete that information. If you believe that we might have any information from or about a child under 16, please contact us using the information provided in the "**How to Contact Us**" section below.

13. How to Contact Us

Should you have other questions or concerns about these privacy policies, please feel free to contact us at customerprivacy@starboardcruise.com

14. Changes to This Privacy Policy

This Privacy Policy may change from time to time. We will post any changes to the Privacy Policy on this page.

To submit request that your user data be deleted, please contact customerprivacy@starboardcruise.com.