

COMPREHENSIVE PRIVACY NOTICE

OTM NAVIERA, S.A. de C.V., with registered address at Av. Paseo de las Moras s/n, Fraccionamiento Náutico Turístico, Nuevo Nayarit, Bahía de Banderas, Nayarit, México, C.P. 63735, is a company dedicated to the operation and provision of maritime passenger transport services, through **VidantaWorld's ELEGANT** (hereinafter referred to as "**OTM**" or "**we**" or "**our**"). Our company is committed to protecting your privacy in accordance with the provisions of the Federal Law on the Protection of Personal Data in Possession of Private Parties ("*Ley Federal de Protección de Datos Personales en Posesión de los Particulares*"), its regulations and other legal provisions applicable in the Mexican Republic (hereinafter and collectively, the "**Legislation**"). In addition to the provisions of the Legislation, **OTM** has adopted the best international practices in the handling and administration of "**Personal Data**", so in order to clearly and specifically inform what Personal Data we collect, the means by which they are collected, as well as the treatment we give to them as "Regulated Subject", in compliance with the Legislation and our commitment to protect your privacy under the highest standards of ethics, responsibility and professionalism, we make this "**Privacy Notice**" available to you.

A. PERSONAL DATA WE COLLECT.

For the fulfillment of the legal relationship and/or the provision of services that you request from us, if you purchase tickets to travel on board the **VidantaWorld's ELEGANT** and/or are our passenger on board, we inform you that **OTM** may collect from you the following categories of Personal Data, either through printed, digital, visual, and/or through any other technology:

Identification and Contact.	Name, surname(s), age, gender, date and place of birth, nationality, address, email, immigration status corresponding to the country of embarkation and/or disembarkation, marital status.
Patrimonial.	Bank data for collection, tax for invoicing such as Federal Taxpayer Registry (RFC) or its equivalent as appropriate to your place of residence.
Biometrics.	Image data in photographs and/or videos, signature.
Family member(s) to whom to give notice in case of emergency.	Full name, relationship, telephone number and/or email.
Companions.	People registered in the cabin or suite, in which case you must ensure that you have their authorization to provide the Personal Data requested for their registration.
Health.	Allergies, diseases, illnesses, and/or any other necessary in the event of an accident, illness or request for the service of a doctor on board and/or food.

Within the categories of Property Data, Biometric Data and/or Health Data and in the case of Personal Data of minors and/or persons in a state of interdiction under their guardianship, as they are considered as Sensitive Personal Data that require special protection, **OTM** will give special treatment to them and will request their express and written consent in accordance with the provisions of the Legislation and the purposes set forth in this Privacy Notice. Therefore, the parent(s) or guardian(s) must have the legal capacity and be in full enjoyment and exercise of parental authority or guardianship to represent the minor(s) and/or person(s) in a state of interdiction in their care and grant their consent in a free, express, unequivocal and informed manner for the processing of the Personal Data of the minor(s) and/or persons in a state of interdiction, which you will voluntarily provide for registration and/or boarding.

Please be advised that if you have booked your itinerary for travel aboard **VidantaWorld's ELEGANT** through a travel agency or third-party vendor with whom **OTM** has a legal relationship, that third party will collect directly under its own privacy policies the information required to make your reservation by entering the required data into our reservation systems. Therefore, by such action said third party is considered as a Regulated Subject or Controller in accordance with the Legislation, which implies that the third party independently decides the treatment it will give to its Personal Data for its own activities, so it will be responsible for the treatment and the appropriate data protection measures, therefore, we invite you to review the privacy notice corresponding to the provider through which you requested your reservation or contact them directly.

B. THE PROCESSING OF PERSONAL DATA BY OTM HAS THE FOLLOWING PURPOSES.

To collect and invoice the services you request from us, as well as to execute reimbursement processes if applicable.	For the provision of additional services to transportation and accommodation aboard Vidanta World's ELEGANT that you request from us, such as concierge, cabin service, restaurants, spa, gym, casino, laundry and/or any other related and during your stay on board.
For the registration and management of the purchase and reservation of Itineraries.	For the fulfillment of contractual obligations regarding the transportation and accommodation services we must provide you on board.
For identification, verification, and/or contact, in any type of legal or business relationship with OTM .	For your attention in the event of security incidents and/or accidents during your stay on board in our facilities, for which we establish security and surveillance measures, including monitoring through video cameras, facial recognition, baggage inspection by x-ray system, security control, and physical and logical access surveillance.
For your care in case of health incidents.	For the fulfillment of obligations before the customs agencies (if applicable), port, and/or government authorities of each country to be visited during the corresponding Itinerary, which will allow us to embark and/or disembark from VidantaWorld's ELEGANT .

In addition, we use your Personal Data for the following "**Secondary Purposes**" that are not necessary for compliance with the legal relationship that gives rise to the processing of your Personal Data, but that allows and facilitates us to provide you with better service:

To inform you of present or future products, services, advertising, promotions, and newsletters that may be of interest to you.

To conduct satisfaction and quality surveys of our products and/or services.

For record-keeping geared towards future service delivery.

To prepare studies and programs for marketing or advertising purposes, business analysis and reports, including the enrichment of personal data, which will allow us to complement or update your information, always acting under the legal framework and with data from internal sources or, where appropriate, external but with public and legitimate access, which will be limited to adequate and accurate information for the fulfillment and/or complement of the purposes that gave rise to it to the legal relationship.

In case you do not want your Personal Data to be used for any of the Secondary Purposes, we invite you to follow the procedure established in point "**E.**" of this Privacy Notice. The refusal to use your Personal Data for these Secondary Purposes may not be a reason for us to deny you the provision of the services and/or products that you request or contract with **OTM**.

C. PERIOD OF STORAGE OF YOUR PERSONAL DATA.

OTM will keep your Personal Data for the duration of the legal relationship with you, or in accordance with the terms established in the applicable legal provisions, or until you request its cancellation, in which case, if the fulfillment of the purposes for which they were collected was fulfilled, the blocking period established by the Legislation will take place until the action(s) that gave rise to their treatment prescribes.

D. MEANS TO LIMIT THE USE OR DISCLOSURE OF PERSONAL DATA.

If you wish to express your refusal to the use or disclosure of Personal Data, you may request to be included in our "**Exclusion List**". To request inclusion in our Exclusion List, you must follow the process set forth in section "**E.**" of this Privacy Notice.

E. EXERCISE OF RIGHTS OF: (i) ACCESS, RECTIFICATION, CANCELLATION, OPPOSITION ("ARCO Rights"); (ii) REQUEST FOR REVOCATION OF CONSENT TO THE PROCESSING OF PERSONAL DATA; (iii) DATA PORTABILITY; AND (iv) RIGHT TO BE FORGOTTEN.

In accordance with the Legislation, you may exercise your right of access to know the Personal Data we have about you in our records, as well as to know why we use them and the treatment we give to them, you may rectify or request their correction in case they are inaccurate; you may request its cancellation, as well as express your opposition to the use and processing; request the right of portability; or revoke consent for its processing, as well as request the right to be forgotten.

In order to exercise any of the rights mentioned above, please download the form available at the following link <https://elegant.vidantaworld.com/docs/formato-arco-elegant-eng.pdf>. The request must be sent by email to datospersonales@grupovidanta.com and must be accompanied by the documentation indicated in the form. Our "**Personal Data Office**" will notify you of the decision within a maximum of 20 (twenty) business days from the date on which the request to exercise ARCO Rights was received. If your request is granted, it will take effect within 15 (fifteen) days of the date on which we notify you of the corresponding response.

When **OTM** deems it appropriate, it may agree with the Owner of the Personal Data, the alternative means for registration on our Exclusion List, always acting in accordance with the Legislation, so that our Personal Data Office can authenticate your identity and be able to respond to your request.

It is important to mention that not in all cases we will be able to satisfy your request for ARCO Rights, revocation of consent, portability or right to be forgotten, since it is possible that due to some legal obligation we may require to continue keeping and/or processing your Personal Data in accordance with this Privacy Notice. If this is the case, we will inform you of the corresponding obligations and we will proceed, where appropriate, to block the corresponding Personal Data, until the legal action(s) that gave rise to its processing prescribes.

In case of doubts or if you wish to obtain more information regarding the procedure for the exercise of ARCO Rights, please direct your request to the Personal Data Office through the email: datospersonales@grupovidanta.com.

F. DATA TRANSFER.

OTM may transfer your Personal Data with affiliated companies and/or subsidiaries, as well as to national or international third parties with whom it has a legal relationship, in order to comply with the services, you request from us. In all cases, the processing will be carried out in accordance with the provisions of this Privacy Notice and in accordance with the following:

RECIPIENT OF PERSONAL DATA	PURPOSE
Medical service on board and/or on land.	For medical treatment if required and/or the management of health services.
Specialized third parties.	Provision of tourist services such as shore excursions.
	Provision of services and fulfilment of contractual obligations.
Port Agencies and/or Government Authorities.	Sending promotions and advertising related to the services operated by OTM .
Banking institutions.	Processing of documents with maritime, (manifest), immigration, tax and/or any other authorities and in relation to embarkation and/or disembarkation.
	Payment and/or refund processing if applicable.

G. ELECTRONIC MEDIA, COOKIES OR WEB BEACONS.

We inform you that on our website we use analytical cookies that allow us to monitor your browsing behavior on our website, which in turn serves as support for advertising segmentation and marketing, to offer you better experience. We also inform you that we may use other technologies through which we may collect Personal Data, always in accordance with the purposes described in this Privacy Notice.

You will be able to disable all cookies, prevent accepting new cookies, have your browser notify you when you receive a new cookie through the "help" button found in the toolbar of your browser.

H. MEANS OF COMMUNICATION FOR CHANGES AND/OR MODIFICATIONS TO THE PRIVACY NOTICE.

OTM reserves the right to update, change, or modify this Privacy Notice at any time. In the event of any changes, **OTM** will communicate them through our website: <https://vidantaworld.com/es>. We therefore suggest that you check our site frequently to stay informed of any modifications to this document.

I. JURISDICTION.

This Privacy Notice is governed by Mexican law; any dispute will be resolved before the competent Mexican authorities. By accepting this Privacy Notice, you waive any other jurisdiction and legislation that may correspond to you by reason of your domicile.

J. AUTHORITY.

If you believe that your right to personal data protection has been violated by any conduct or omission on the part of **OTM**, or if you suspect any violation of the provisions set forth in the legislation and other applicable regulations, you may file a complaint with the Personal Data Protection Unit of the General Directorate of Personal Data in the Private Sector of the Undersecretary of Good Governance (*Unidad de Protección de Datos Personales de la Dirección General de Datos Personales en el Sector Privado de la Susecretaria de Buen Gobierno*).

K. VALIDITY.

This is the most recent version of our Privacy Notice, which came into effect as of February 9, 2026.

OTM's Privacy Notice was originally written in Spanish and has been translated into English by OTM in good faith. However, it is understood and agreed that, in case of doubt or dispute regarding its interpretation, the Spanish version shall prevail in all cases.