

Compass Card Privacy Policy

Compass Card is operated by JLS Yachts LLC ("JLS", "we", "our", or "us").

JLS Yachts LLC recognises that many Compass Card members work within the superyacht industry, where confidentiality, discretion, and data security are of paramount importance. We are committed to protecting personal information and maintaining the trust of yacht crew, management companies, family offices, owners' representatives, corporate partners, and all Compass Card members.

This Privacy Policy explains how we collect, use, store, protect, and disclose information when you use the Compass Card mobile application, website, and related services.

By registering for or using Compass Card, you agree to the practices described in this Privacy Policy.

1. Information We Collect

To provide Compass Card membership services, we may collect the following information.

Mandatory Registration Information

The following information may be required to create and maintain a Compass Card account:

- Full Name
- Email Address
- Mobile Number
- Nationality
- Vessel Name
- Position Onboard (Captain, Chief Engineer, Engineer, Officer, Stewardess, Deckhand, Chef, etc.)
- Employer, Yacht Management Company, or Operating Company
- Password and Account Credentials

Optional Information

Users may choose to provide:

- Profile Photograph
- Secondary Contact Information
- Preferred Locations or Regions
- Communication Preferences
- Interests and Service Preferences

Automatically Collected Information

When using the Compass Card application, we may automatically collect:

- Device Type
- Operating System Version
- Application Version
- IP Address
- Login Activity
- Browser Information (where applicable)
- Diagnostic and Performance Data
- Security Logs
- Usage Analytics

2. Location Data

Compass Card may use location services to improve the member experience.

Location information may be used to:

- Display nearby participating partners and offers
- Improve search and recommendation functionality
- Verify offer redemption locations where applicable
- Support future location-based member services

Location data will only be collected:

- With the user's permission
- While the application is active, unless otherwise disclosed
- For legitimate business and operational purposes

Users may disable location permissions through their device settings. Certain location-based features may become unavailable if location services are disabled.

Compass Card does not continuously track member movements.

3. Redemption and Usage Data

To administer member benefits and partner programmes, Compass Card may record information relating to offer usage and redemption activities.

This may include:

- Date and Time of Redemption
- Offer Redeemed
- Participating Partner Business
- Member Account Identification
- Redemption Status
- Device Information
- Approximate Location (where applicable)
- Transaction or Verification References

This information helps:

- Prevent fraud and misuse
- Validate partner reimbursements
- Measure programme performance
- Improve member services
- Generate anonymised reporting and analytics

4. Communications and Marketing

JLS may communicate with members through:

- Email
- Push Notifications
- SMS Messages
- WhatsApp Communications
- In-App Notifications

Communications may include:

Service Communications (Mandatory)

These communications are necessary for operation of the service and cannot be opted out of while maintaining an active account.

Examples include:

- Account Verification
- Password Resets
- Security Notifications
- Membership Status Updates
- Important Operational Announcements
- Changes to Terms or Privacy Policies

Marketing Communications (Optional)

Subject to applicable laws and user preferences, we may send:

- Newsletters
- Promotional Offers
- Partner Promotions
- Event Invitations
- Industry Updates
- Training Opportunities
- New Feature Announcements

Users may unsubscribe from marketing communications at any time.

5. Information Shared with Partners

JLS Yachts LLC follows a principle of data minimisation.

We do not sell, rent, trade, or commercially distribute member information.

When members redeem offers or access partner services, only the minimum information necessary may be shared.

Depending on the service, this may include:

- Membership Verification Status
- Member Name
- Membership Number or Account Reference
- Redemption Confirmation
- Offer Eligibility Status

Compass Card does not routinely share:

- Mobile Numbers
- Email Addresses
- Vessel Employment History
- Management Company Details
- User Activity History
- Full Account Profiles

unless required by law, explicitly authorised by the member, or necessary to fulfil a requested service.

6. Data Storage and Hosting

Compass Card data may be hosted using reputable cloud infrastructure providers, including:

(This is subject for changes once confirmed by the app developers)

- Google Cloud Platform
- Other enterprise-grade hosting providers

Data may be processed and stored in multiple jurisdictions depending on operational and technical requirements.

Where information is transferred internationally, JLS will take reasonable measures to ensure appropriate safeguards are in place to protect personal information.

7. Confidentiality Commitment

JLS Yachts LLC understands that confidentiality is a core expectation within the superyacht industry.

Accordingly:

- Member information will be treated as confidential.
- Vessel affiliations and employment details will not be publicly disclosed.
- Redemption history will not be shared publicly.
- User activity information will only be accessible to authorised personnel with a legitimate business need.
- Information will only be used for purposes outlined in this Privacy Policy.
- Personal data will never be sold to third parties.
- Access to member information is restricted and monitored.

We are committed to handling member information with the same level of professionalism and discretion expected throughout the superyacht sector.

8. Data Retention

We retain personal information only for as long as necessary to fulfil legitimate business, operational, legal, or regulatory requirements.

Typical retention periods include:

Active Accounts

Information retained while membership remains active.

Inactive Accounts

Accounts inactive for an extended period may be archived or deleted after twelve (12) months.

Redemption Records

Redemption and transaction history may be retained for reporting, auditing, fraud prevention, and partner programme administration.

Account Deletion Requests

Where legally permitted, personal information will generally be deleted or anonymised within thirty (30) days of an approved deletion request.

Certain records may be retained longer where required by law, regulatory obligations, dispute resolution, or fraud prevention requirements.

9. Security Controls

JLS implements reasonable technical and organisational security measures designed to protect personal information.

Security measures may include:

- Encrypted Data Transmission (SSL/TLS)
- Secure Password Hashing and Storage
- Multi-Factor Authentication for Administrators
- Role-Based Access Controls
- Audit Logging and Monitoring
- Regular Security Reviews
- System Backups and Disaster Recovery Procedures
- Access Restrictions for Authorised Personnel Only

While no system can guarantee absolute security, JLS continuously seeks to maintain industry-appropriate safeguards.

10. Future Features and Services

Compass Card may introduce additional features in the future, including:

- Digital Membership Cards
- Loyalty and Rewards Programmes
- Event Registration and Ticketing
- Emergency Notifications
- Industry News and Updates
- Job Opportunities
- Partner Booking Systems
- Crew Networking Features
- Additional Member Benefits and Services

Where future features require the collection or processing of additional personal information, this Privacy Policy will be updated accordingly.

11. User Rights

Subject to applicable laws, users may request to:

- Access their personal information
- Correct inaccurate information
- Update profile information
- Restrict certain processing activities
- Request deletion of personal information
- Withdraw consent where applicable

Requests may be submitted using our contact details.

12. Updates to this Privacy Policy

JLS Yachts LLC may update this Privacy Policy from time to time to reflect changes in services, legal requirements, security practices, or operational needs.

Updated versions will be made available through the Compass Card application and related platforms.

Continued use of Compass Card following publication of updates constitutes acceptance of the revised Privacy Policy.

13. Contact Information

For questions regarding this Privacy Policy, confidentiality practices, or data protection matters, please contact:

JLS Yachts LLC
Email: web@jlsyachts.com

JLS Yachts LLC remains committed to protecting member privacy, maintaining confidentiality, and applying professional standards of data stewardship throughout the Compass Card programme.