



GRAND CIRCLE CRUISE LINE

GCCL (Cayman) Ocean Fleet Management Ltd.

Confidentiality Policy Security of customer/employee information

Grand Circle Cruise Line must protect against unauthorized disclosure of confidential information outside the Company and against the use of confidential information by Employees and former Employees. We do business with and provide services to many companies, organizations and individuals. All information relative to our business, Employees and individual guests must be treated on a confidential basis.

The following conditions shall apply to all Grand Circle fleet Employees

1. Information, whether written or otherwise, relevant to our business, Employees, and individual guests must be protected.
2. Complete security and protection of all documents and information is required at all times.
3. Written materials will not, at any time be circulated or contents disclosed to any outside source or unauthorized person. It is clearly established privacy of information of our individual passengers and the business of GCCL.
4. Discretion must be exercised in discussing individual guest information.
5. Guest information must never at any time be discussed or disclosed to any unauthorized person.
6. Employee information (i.e. address, telephone number etc.) must not be released to any unknown or unauthorized source.
7. Personal data inquiries (as salary, dates of employment, references etc) must be referred to Human Resources Department for handling.
8. This policy statement shall apply to all GCCL staff who has discontinued employment with the Company regardless of reason.
9. Breaking of Confidentiality policy is a reason for termination of contract.

Signature _____ Date _____

PRINT _____
IN CAPITAL LETTERS