

PRIVACY POLICY

This website is operated by Formidion Aviation Holdings Limited and its subsidiaries (collectively “**Formidion Aviation**”). This privacy policy explains the personal information we collect about you when you use this website (www.formidion.aero) and how we use that information.

This website contains links to websites operated by companies outside the Formidion Aviation. This privacy policy applies only to this website, so if you follow a link to any of these websites please make sure you read their privacy policies.

If you have any questions about this privacy policy or about any information we hold about you, please address them to: Formidion Aviation Holdings Limited, Level 2, 92 / 93 Saint Stephen’s Green, Dublin 2, DO2 W863, Republic of Ireland, +353 1 428 3314
email: DataOfficer@Formidion.aero

Information we collect

We collect the following information about you when you use this website:

- Information that you voluntarily choose to provide by completing forms on this website. This includes your name, e-mail address and phone number so that we can respond to your questions and comments. You may choose to provide additional information as well.

Website usage data

When you visit the website, we may automatically (i.e. not by registration) collect and store the following information about you:

- Details of your visits to this website, including details of the web pages and other resources you access, type of Internet browser and operating system used, domain name of the website from which you came, number of visits, average time spent on the site, pages viewed.
- Through your use of telecommunications services to access our website, your communications data (e.g. Internet protocol address) or utilization data (e.g. information on the beginning, end and extent of each access, and information on the telecommunications services you accessed) are technically generated and could conceivably relate to personal data.

No attempt is made to identify individual users or to associate the technical details listed above with any individual.

Cookies

Like many companies, we may use browser cookies on this website. Browser cookies are bits of text that are placed on the hard drive of your computer when you visit certain websites. We use browser cookies to tell us, for example, whether you have visited us before or if you are a new visitor and to help us identify site features in which you may have the greatest interest. If you do not wish to receive cookies, please configure your Internet browser to erase all cookies from your computer’s hard drive, block all cookies or to receive a warning before a

cookie is stored. Remember though that, without browser cookies, you may not be able to take full advantage of all our website features.

How we use information we collect

We use information we collect about you in the following ways:

- To respond to your questions and comments, in which case the legal bases for our processing may be any or all of the following, depending on the relevant circumstances in each case:
 - your consent;
 - that it is necessary for our performance of our contract with you, which is governed by the terms of use of our website, or to take steps prior to entering into a contract with you;
 - our legitimate interests in performing our business in a responsible and commercially prudent manner and pursuing our corporate and social responsibility objectives; or
 - in certain circumstances, that it is necessary for compliance with applicable legal obligations.
- To customise the way information on this website is presented to you, in which case the legal bases for our processing may be any or all of the following, depending on the relevant circumstances in each case:
 - that it is necessary for our performance of our contract with you, which is governed by the terms of use of our website;
 - our legitimate interests, or those of our third-party service providers, which can be listed as follows:
 - conducting business in a responsible and commercially prudent manner,
 - maintaining the security of IT systems and preventing their misuse; or
 - pursuing our corporate and social responsibility objectives; or
 - in certain circumstances, that it is necessary for compliance with applicable legal obligations.
- To monitor the attractiveness of our website and improve its performance or content, in which case the legal basis for our processing is:
 - our legitimate interests, or those of our third-party service providers, which can be listed as follows:
 - conducting business in a responsible and commercially prudent manner,
 - maintaining the security of IT systems and preventing their misuse; and
 - pursuing our corporate and social responsibility objectives.
 - To enforce our website terms of use, including investigation of potential violations of those terms of use, in which case the legal basis for our processing may be any or all of the following, depending on the relevant circumstances in each case:
 - that it is necessary for our performance of our contract with you, which is governed by the terms of use of our website;
 - it is necessary for compliance with legal obligations; or
 - our legitimate interests in conducting our business in a responsible and commercially prudent manner, and preventing, investigating or detecting theft, fraud or other criminal activity.

We do not sell or otherwise market your personal data to third parties.

Legitimate interests

Where we have listed our legitimate interests as the legal basis for our processing above, please note that we will not process your personal data for these purposes if our or the third party's legitimate interests should be overridden by your own interests, rights and freedoms.

Information that we share

We may disclose your personal data to other organisations in connection with the above purposes including:

- To other members of the Formidion Aviation;
- To third party service providers that we engage to provide services to us in connection with the website, such as IT service providers, professional advisors and auditors. These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf;
- To any successor owners or operators of the website;
- To public authorities and bodies where required or permitted by law, such as law enforcement authorities for the purposes of the prevention, investigation or detection of crime or fraud;
- If Formidion Aviation Holdings Limited or any of its subsidiaries, or most or all of its assets, are acquired by a third party, your personal information may be shared with the company, organisation or individual making the acquisition.

Transfers abroad

In connection with the above, we may transfer your personal data to a country outside the European Economic Area, including to a country which has not been found by the European Commission to provide an adequate level of data protection. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law. These may include entering into a data transfer agreement incorporating the 'standard contractual clauses' approved by the European Commission or, in respect of transfers to the United States of America, ensuring that the transfer is covered by the EU-US Privacy Shield framework. If you would like to receive further details of the measures that we have taken in this regard, please contact us using the contact information listed at the beginning of this privacy policy.

Requirement to provide data

You are not under a statutory or contractual obligation to provide us with any personal data.

How we protect your information

We maintain administrative, technical and physical safeguards to protect against unauthorized disclosure, use, alteration or destruction of the personal information you provide on this website.

Retention

We will not retain your personal data for longer than necessary. We retain your personal data only for as long as we need it for the purposes described in this privacy policy, or to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise between you and us.

Your rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- the right to access your personal data, which means that you are entitled to a copy of any information that we hold about you;
- the right to request that we correct information that we hold about you that is inaccurate;
- the right to erasure of your personal information;
- the right to restrict the use of your personal information;
- the right to object to the processing of your personal information;
- the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller;
- where our processing of your personal data is based on you having provided consent, the right to withdraw your consent to the processing at any time.

If you wish to avail of any of these rights, please contact us using the contact information listed at the beginning of this privacy policy.

Complaints

If you are not happy with the way we are using your personal data or how we facilitate your rights or comply with our obligations under applicable data protection law, you have the right to make a complaint to the Irish Data Protection Commission or your local supervisory authority by emailing info@dataprotection.ie.

Changes to this policy

We keep this privacy policy under regular review and will place any updates on this web page. We encourage you to frequently check this page for any changes to this Privacy Policy. Your continued use of the website following any change in this privacy policy will constitute your acceptance of such changes. If you do not accept such changes, you must not use the website.

This privacy policy was last updated on 10th November 2019.