Aviation Advocacy Sarl Privacy Policy

Last Updated on 8 June 2018

Who we are

Aviation Advocacy Sàrl is a company that provides consulting services and, separately, publishes aviation industry commentary, insights and other aviation-related information. Visit <u>our website</u> for additional information.

How this Privacy Policy applies to you

This Privacy Policy describes the information we collect from you; how we collect, use or otherwise process that information; and our legal basis for doing so. It also covers how you can control the collection, correction and/or deletion of such information.

The Privacy Policy applies to you when you subscribe to our publications, when you request to receive our publications and information, and when you enter into a contract with Aviation Advocacy for the provision of services.

What information we collect and how we collect it

We collect only information you provide directly to us in order to receive our services, publications and associated information. Such personal data includes your name and email address, and sometimes your company's name, your title or position within a company, and mailing address.

We collect your personal data in the following ways:

- Through registration pages on our websites;
- Through in-person meetings where contact details, such as on business cards, are exchanged for the purposes of receiving Aviation Advocacy publications, emails, promotions and announcements;
- Through email exchanges where receipt of services, publications, promotional materials and associated information are requested;
- Through subscriptions to our publications;
- And through contracts entered into by you and Aviation Advocacy for the provision of services.

How we use this information

We use your information only in accordance with applicable laws on data privacy. More specifically, we use your personal data in the following ways:

- To disseminate our publications the monthly subscription Aviation Intelligence Reporter
 and the Aviation Advocacy Blog as well as to promote and disseminate information about
 these publications and our services;
- To send you emails that update you on news and developments about Aviation Advocacy and/or to the aviation industry more generally;
- To provide the secretariat and other support services to the ATM Policy Institute.

Furthermore, on occasions, such as holidays and moments of celebration and/or commemoration, we may use your mailing address to send you information, cards and tokens of our appreciation.

How we retain, transfer and store this information

Your personal data is stored on Aviation Advocacy computers. We take every reasonable step to ensure that your personal data are processed and stored only for the minimum period necessary for legitimate business purposes and/or to meet legal requirements, such as law enforcement, in accordance with applicable laws.

We do not share your personal data with any third parties except where necessary for legitimate business purposes and where required for law enforcement purposes.

Our websites may use third party plugins or content. If you choose to interact with any such plugins or content, your personal data may be shared with the third-party provider of the relevant social media platform. We recommend that you review that third party's privacy policy before interacting with its plugins or content.

Data security

We have implemented appropriate technical and organisational security measures designed to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of processing, in accordance with applicable laws.

European Union member state residents and citizens

Data protection law in the European Union requires a 'lawful purpose' for collecting and retaining personal information from citizens and residents of the European Economic Area. Our lawful bases include:

- Performing contracts we have with you: In certain circumstances, we need your personal data to comply with our contractual obligations to deliver services to you;
- Consent: Where you agree to receive our publications and messages by signing up on our website, by email, telephonic or in-person request, and/or by entering into subscriptions for our publications, you are providing consent to Aviation Advocacy to process, store and use your personal data;

• Legitimate interests: We sometimes require your data to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and that does not materially impact your rights, freedom or interests.

Under the European Union's data protection law, small and medium-sized enterprises with fewer than 250 employees are granted an exemption from the requirement to maintain records of data processing activities. As such, we do not currently maintain such records.

Your rights

Users residing in certain countries, including the EU, are afforded certain rights regarding their personal information. These rights may include the ability to access, correct, and request deletion of your personal information. While these rights are not applicable globally, all recipients of our publications, products and services can manage their personal data, including accessing, editing and/or deleting all of their personal data, by submitting a request to Aviation Advocacy at either of the following addresses:

• Email: info@aviationadvocacy.aero

• Mail: Aviation Advocacy Sàrl, Rue de la Gare 17, CH-1260 Nyon, Switzerland

Data protection authority

Subject to applicable law, if you are a citizen or resident of the European Economic Area, you have the right to object to Aviation Advocacy using your personal data and to lodge a complaint with your local data protection authority.

Children

People under 18 (or the legal age in your jurisdiction) are not permitted to receive our publications or messages. Aviation Advocacy does not wittingly collect any personal information from anyone under the age of 18. If you believe that a child has provided us with personal information, please contact us at info@aviationadvocacy.aero

Changes to This Policy

We may update this policy from time to time. If we do, we will let you know about any material changes, either by announcing such changes on our website or by sending you an email. New versions of this Privacy Policy will never apply retroactively.