

AerFin



Privacy Policy

1 Who are we?

This Privacy Policy sets out how AerFin Limited, together with its subsidiaries and affiliates listed in Appendix 1 (“**AerFin**”, “**we**” and “**us**”) uses and protects information that you provide when you use this website and our services.

We are the controller of the personal data processed under this Privacy Policy. The relevant data controllers of your personal data will depend on where you are located, the products and/or services you purchase and the nature of the processing activities.

Please see the Appendix 1 for a list of our subsidiaries and affiliates and how to contact them.

2 About this Privacy Policy

This Privacy Policy tells you about how we use, protect and disclose personal data that we have collected using both offline means (e.g. via phone, mail, in-person meetings and other correspondence) and online means, such as when our website, applications and services are used and accessed.

This Privacy Policy is limited to the personal data that we process as a controller, which predominantly consists of personal data relating to representatives of our corporate clients, partners and vendors, candidates that submit speculative applications through our websites, and visitors to our websites. We refer to such individuals as “**you**” and “**your**” in this Privacy Policy.

To the extent any linked websites or applications visited are not owned or operated by us please be aware that we are not responsible or liable for the websites’ or applications’ content, any use of the websites or applications, or the privacy and security practices and policies of those websites or applications.

3 Country specific provisions

In addition to the provisions set out in this Privacy Policy, additional terms and information relating to our processing of personal data may apply depending on where you are located. These additional terms are set out as Appendices to this Privacy Policy.

4 What personal data do we collect?

We may collect the personal data listed in this section 4. Please note that we may combine personal data collected from one source with personal data that we have collected from other sources.

(a) Personal data in connection with use and access to our products and services

This personal data may include name, email address, telephone number and other contact details, business information and job title, marketing preferences, account information (username and password) where applicable, payment and invoicing information and other information relevant to customer surveys and/or offers or provided as part of a user profile.

(b) Correspondence and interactions with us

We collect personal data where you contact us or we contact you, and we will typically keep a record of such correspondence. This personal data may include your name and contact information, account information, information regarding the service you have used or accessed, your queries, and other personal data you may choose to provide to us.

We also collect personal data provided to us through a customer surveys, testimonial, feedback, review or comment.

(c) Sanctions, anti-money laundering and anti-fraud information

We may collect personal data relating to your financial situation, or any criminal or fraudulent activities provided to us by you or third parties, including information which establishes your identity (such as driving licences, passports and utility bills), date of birth, place of birth, nationality, data revealing racial or ethnic origin, gender, address, information about transactions, credit ratings from credit reference agencies, fraud, offences, sanctions information and suspicious transactions, where your details are included.

(d) Social media and aviation platforms information

We maintain presences on social media platforms including, but not limited to Twitter, Meta (Instagram, Facebook), and LinkedIn, and aviation platforms including but not limited to AeroExchange, b2b-aero.com, Inventory Locator Service. We collect personal data when you interact with us on social media. Please note that these social media and other platforms may set cookies and other tracking technologies on your device when you visit their pages and when you navigate from their pages. The output of such information may be provided to us (usually for statistical purposes to see how users interact with our content on social media and other platforms). These social media and other platforms will also be data controllers of your personal data. Information about how they collect and use your personal data (and how they use cookies and other technologies, including instructions on how you can disable these) can usually be found in their respective privacy policies and cookies policies on their respective websites.

(e) Information stored on a device

We may access metadata and other information associated with other files stored on your computer, tablet, mobile phone, or any other device such as IP address, domain name, browser version and operating system, traffic data, web logs and other communication data, and device identifiers. To the extent required by applicable law, we will ask for your consent prior to collecting device information.

(f) Location Information

With your permission (where required by applicable law), which you may provide when you install our mobile application or when you access and use our mobile application, we may collect information about the general location of a device.

(g) **Collection and use of public information**

We may also collect, use, store, transfer, share, and disclose your personal data that is publicly available for the purposes set out in this Privacy Policy.

(h) **Information provided by applicants using the contact form on the AerFin website**

We may process any personal data provided to us when you submit speculative job applications using the contact form on our site for the purpose. Please do not submit sensitive data relating to health, sexuality, religion or trade union membership in any such applications.

5 Why do we use personal data?

We may use your personal data for a variety of business purposes, which we have set out below.

(a) **For account registration**

We use personal data to open and manage accounts. This personal data may include name, job title and other business information, address, phone number, and email address.

(b) **To conduct our business and provide our services**

To conduct our business, including to enable use of our services and our websites/applications to respond to queries, for internal record keeping, to carry out our obligations arising from any agreements entered into (including with suppliers) and to contact customers or potential customers in connection with the foregoing.

(c) Such communications are provided by various means, including emails, videocalls and telephone. Calls may be recorded for training and monitoring purposes, and a recording and transcript may be retained.

(d) **To provide communications and to provide technical and customer support**

To communicate about updates to / about our business, products, services and websites/applications and to provide customer and technical support and to respond to requests, comments, questions, or concerns, and to contact customers or potential customers if we have any issues with respect to same.

Such communications are provided by various means, including emails, videocalls and telephone. Calls may be recorded for training and monitoring purposes, and a recording and transcript may be retained to resolve questions or issues related to our services.

(e) **In relation to bribery, fraud, and money laundering prevention**

To prevent bribery, fraud and money laundering as may be required by applicable law and regulation and best practice at any given time. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to respective authorities and may be recorded by us or by them.

(f) **To allow use of the interactive features of our website**

To allow customer surveys, testimonials, reviews or comments. Please note that such testimonial, review or comment may be read, collected and used by anyone.

(g) **To ensure our website content is relevant and to maintain the security of our website**

To ensure that content from our websites is presented in the most effective and secure manner.

(h) **For analytics and business development purposes, including feedback and surveys**

To analyse personal data in order to better understand our business, services and our customers' services and marketing requirements, and develop our services and websites/applications. This may include aggregating and/or de-identifying your personal data.

(i) **To provide marketing materials**

To provide updates and offers, where customers or potential customers have chosen to receive these. We may use automated decision-making to do so. We may also use personal data for marketing our own and our selected business partners' products and services by mail, email, SMS, and phone. And we may use personal data to market via social media. Where required by law, we will ask for consent at the time we collect the personal data to conduct these types of marketing. Where required by law, we will provide an option to unsubscribe or opt-out of automated decision-making and further communication on any electronic marketing communication sent or you may opt-out/change your marketing settings by contacting us.

Please note that even if you opt-out of receiving marketing emails, you may still receive communications from us that are important and/or related to your interactions with us, or otherwise as required by law.

Please also note that our marketing related emails may contain a campaign-unique "web beacon pixel" to tell us how you interact with our communications. We may use this information for purposes including determining which of our emails are more interesting to you and to query if you should continue receiving emails if you do not open them. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should opt-out of email marketing or review emails in plain text format. This information may be connected to your personal identity.

(j) **To enforce our terms, in connection with legal or regulatory obligations and to manage claims**

We may process personal data to enforce our terms and to comply with our legal, contractual, and regulatory requirements or dialogue with regulators/judicial proceedings/court orders and manage claims and litigation (as applicable) which may include disclosing personal data to third parties, including our advisors, insurers, financiers, the court service and/or regulators or law enforcement

agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so.

(k) To reorganise or make changes to our business

In the event that we: (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a re-organisation, we may need to transfer personal data to the relevant third party (its and our advisors) as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation. We may also need to transfer personal data to that re-organised entity or third party after the sale or reorganisation.

(l) To process job applications received from candidates via our websites

In the event that we receive speculative job applications (including, for example, CVs or cover letters) from individuals via the contact form or contact details provided on our website, we may process any personal data contained therein to process the application and consider whether to make an offer of employment to the individual.

6 Cookies and similar technologies

We use cookies and similar technologies. For more information, please refer to our respective entities' cookies policies, available at <https://www.aerfin.com/cookie-policy/>.

7 Who do we share personal data with and why?

We may share or disclose personal data for the purposes set out in section 5 above to third parties. These third parties include service providers, business partners and our advisors. We may share your personal data we collect and process across our subsidiaries and affiliates. As per section 5(k) above, we may also need to transfer personal data in the context of a reorganisation or sale of all or part of our business.

Any personal data made available publicly, such as reviews, comments or testimonials, may be shared with other users of our website. We may disclose personal data as required by law, regulation and other binding requests (such as subpoenas and court orders), and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on us.

8 How do we protect personal data?

We take commercially reasonable efforts to protect the personal data under our control. Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect personal data, we cannot guarantee the security of it transmitted to our websites, applications or through communications. If you are given user credentials (such as username and passwords) when accessing our services, please keep these safe and do not disclose these to third parties.

9 International transfers of personal data

Personal data may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the country in which an individual is located, including in the UK, EU, United States, Singapore, and UAE.

These countries may not provide the same level of data protection as a home country; however, we will take steps to ensure that personal data that is transferred outside a home country is safeguarded as in line with this Privacy Policy and applicable laws.

10 How long do we keep your personal data?

Our retention periods for personal data are based on business needs and legal requirements. We will retain personal data while we are using it, for purposes described in section 5 above. We may continue to retain it after we have ceased such uses for certain legitimate business purposes. We may also continue to retain personal data to meet our legal requirements or to defend or exercise our legal rights.

The length of time for which we will retain personal data will depend on the purposes for which we need to retain it. After we no longer need to retain personal data, we will delete it, anonymise it, or securely destroy it.

11 What are your rights?

We operate countries with data protection laws which provide different rights to individuals in respect of access, deletion, rectification and limiting processing of personal data. When a request to exercise certain rights in relation to personal data is made, we will need to check the entitlement prior to answering a request.

In general, the following rights are likely available regardless of where an individual is located:

- the right to stop receiving marketing communication; and
- the right to require us to update any inaccuracies in the personal data we hold. In order to assist us with this, please keep the relevant information up to date.

To submit a request regarding personal data by email, please contact us as per section 12 below.

12 Contact details for queries or complaints

In case of any queries or questions in relation to this Policy, please contact the Data Protection Officer. Details below:

In case of **AerFin Limited**:
privacyenquiries@aerfin.com
with copy to
Naomi Mattock
Address: Newton Road,
Crawley
RH10 9TS
Tel: +44 1293 583244
Email:
naomi.mattock@aerfin.com

In case of **AerFin Limited (Singapore Branch)**:
privacyenquiries@aerfin.com
with copy to
Jo Rival
Address: 105 Cecil street,
#18-18,
The Octagon, Singapore,
069534
Tel: +44 7867 336617
Email: jo.rival@aerfin.com

In case of **AerFin US, LLC**:
privacyenquiries@aerfin.com
with copy to
Naomi Mattock
Address: 3740 West 104th
Street, Hialeah, FL 33018,
United States
Email:
naomi.mattock@aerfin.com

13 Complaints

The Company shall endeavour to handle all complaints related to data protection in the first instance. Irrespective of this, the Company acknowledges that Data Subjects have

the right to complain to the relevant supervisory authority (i.e., ICO, PDPC, DPC, Florida AG, etc.) about the Processing of their personal data.

Under the DPA 2018, we are required to have a procedure in place for handling data protection related complaints. Any complaints from Data Subjects in relation to how we Process their personal data that is within scope of the DPA 2018 / UK GDPR will be handled in accordance with the procedure set out in Appendix 5.

Individuals in the U.S. also have the right to contact the Federal Trade Commission (reportfraud.ftc.gov) in respect of federal consumer protection matters. Where a U.S. Consumer's rights request is denied in whole or in part, the Consumer may submit an appeal to the Company using the contact details set out in section 16. The Company shall acknowledge receipt of the appeal and provide a written response within 60 days. If the appeal is denied, the Company will notify the Consumer of their right to contact the Florida AG.

14 Updates to this Privacy Policy

We regularly review and, if appropriate, update this Privacy Policy from time to time, and as our services and use of personal data evolves. We will update the date of this document each time it is changed.

Appendix 1: List of AerFin Limited affiliates and subsidiaries acting as data controllers under this Privacy Policy

Name	Registered address	Country of establishment
AerFin US, LLC	3740 West 104th Street, Hialeah, FL, 33018	Florida, United States
AerFin Limited (Singapore branch)	105 Cecil Street, #18-18, The Octagon, Singapore	Singapore
AerFin Limited	38 Baggot Street Lower, Dublin, Ireland, D02 Y793	Dublin, Ireland

Appendix 2: EEA and UK specific provisions

If you are located in the EEA or the UK, the provisions of this Appendix 2 apply in addition to the provisions of the Privacy Policy.

Why do we use your personal data? Who do we share your personal data with and why?

The provisions of this section apply in addition to section 5 and section 7 of the Privacy Policy. With respect to individuals located in the EEA or the UK, use and disclosure of personal data must be based on one of a number of lawful bases and we are required to set out the lawful bases in respect of each use made of your personal data.

In the list below, we have set out the relevant lawful bases that apply to each purpose for which we use your personal data as described in section 5 of the Privacy Policy (including the sharing of your personal data for these purposes as per section 7 of the Privacy Policy).

Why do we use your personal data (by reference to section 5 of the Privacy Policy)	Lawful basis
5(a): For customer account registration	Contract performance (if our contract is entered into with an individual) and in all other cases, legitimate interests (to enable us to perform our obligations and provide our products and services to you).
5(b): To conduct our business and provide our products and services	Contract performance (if our contract is entered into with an individual) and in all other cases, legitimate interests (to enable us to perform our obligations, including to suppliers) and provide our products and services to you).
5(c): To provide communications and to provide technical and customer support	Contract performance (if our contract is entered into with an individual) and in all other cases, legitimate interests (to enable us to perform our obligations and provide our products and services to you).
5(d): To facilitate payments	Contract performance (if our contract is entered into with an individual) and in all other cases, legitimate interests (to ensure payments are correctly managed).
5(e): In relation to bribery, money laundering, and fraud prevention	Legal obligations, legitimate interests (to cooperate with law enforcement and regulatory authorities).

Why do we use your personal data (by reference to section 5 of the Privacy Policy)	Lawful basis
	With respect to special categories of personal data, we will usually rely on legal claims, substantial public interests (processing for the prevention and detection of fraud/crime) or very rarely where necessary, explicit consent.
5(f): To allow use of the interactive features of our website	Legitimate interests (to enable us to promote and develop our business based on feedback).
5(g): To ensure our website content is relevant and to maintain the security of our website	Legitimate interests (to allow us to provide you with the content and services in a secure manner).
5(h): For analytics and business development purposes, including feedback and surveys	Legitimate interests (to allow us to improve our services).
5(i): To provide marketing materials	Consent, legitimate interest (where we are not required to rely on consent) (to keep you updated with news in relation to our products and services).
5(j): To enforce our terms and in connection with legal or regulatory obligations and to manage claims	Legal obligations, legitimate interests (to cooperate with law enforcement and regulatory authorities). With respect to special categories of personal data, we will usually rely on legal claims, substantial public interests (processing for the prevention and detection of fraud and other crime) or very rarely where necessary, explicit consent.
5(k): To reorganise or make changes to our business	Legitimate interests (in order to allow us to change our business).

International transfers of personal data (specifically, transfers outside of the EEA and UK)

The provisions of this section apply in addition to section 9 of the Privacy Policy. If transfers are made to other countries that are not deemed to provide adequate protections under EEA or UK law, we will ensure that such transfer is subject to appropriate safeguards in accordance with applicable data protection laws such as approved standard contractual clauses. You can contact the relevant data controller as per section 12 of the Privacy Policy for further information about the safeguards applied to your personal data.

What are your rights?

The provisions of this section apply in addition to section 11 of the Privacy Policy.

In **addition** to the rights set out at section 11 of the Privacy Policy, you may, under certain conditions, have the right to:

- be provided with details about what personal data we hold about you and to be provided with a copy of your personal data;
- withdraw your consent (where our processing activity is based on your consent);
- be provided with a copy of the information you have provided to us in a machine-readable format so that you can transfer it to another provider or ask us to transfer this to another data controller (where our processing activity is based on contract performance or consent);
- require us to delete personal data (including where our processing activity is based on your consent or our legitimate interests);
- restrict how we use your personal data whilst a complaint is being investigated;
- object to our processing of your personal data (where our processing is based on our legitimate interests); and
- ask us not to reach decisions affecting you using automated processing or profiling.

Additionally, if you are based in France, you have the right to define directives on the processing of your personal data after your death in compliance with the French data protection act (law n°78-17 of 6 January 1978 as amended). To submit a request regarding personal data by email, please contact us as per section 12 of the Privacy Policy.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights, we will check your entitlement and respond in most cases within a month.

If you are not satisfied with how we have addressed your complaint or concerns, you can also contact your appropriate EEA Data Protection Authority (DPA) (https://edpb.europa.eu/about-edpb/about-edpb/members_en). If you are located in the UK, your DPA is the Information Commissioner's Office (www.ico.org.uk).

Appendix 3: Singapore specific provisions

If you are located in Singapore, the provisions of this Appendix 3 apply in addition to the provisions of the Privacy Policy. The collection, use and disclosure of personal data in Singapore is governed by the Personal Data Protection Act 2012 (“**PDPA**”).

Consent and bases for processing

We collect, use and disclose your personal data with your consent, or where consent is deemed to have been given by you (for example, where you voluntarily provide personal data to us for an obvious purpose), or where an exception under the PDPA permits us to do so without consent.

International transfers of personal data

The provisions of this section apply in addition to section 9 of the Privacy Policy. We will not transfer personal data to a country or territory outside Singapore except in accordance with the requirements prescribed under the PDPA i.e., we will ensure that a standard of protection comparable to the protection under the PDPA is provided to the transferred personal data.

What are your rights?

The provisions of this section apply in addition to section 11 of the Privacy Policy.

At any time, you may:

- request access to personal data about you that is in our possession or under our control, as well as information about the ways in which your personal data has been or may have been used or disclosed by us within a year before the date of the request. Please note that you may be charged a reasonable fee (for which we will provide a written estimate) for us to process an access request;
- request correction of any error or omission in the personal data we hold about you. Please note that there may instances where we are not required to correct or otherwise alter your personal data, for example, as set out in the Sixth Schedule of the PDPA; and
- withdraw your consent to the collection, use or disclosure of your personal data for any purpose by giving us reasonable notice.

To submit a request regarding personal data by email, please contact us as per section 12 of the Privacy Policy.

There may be instances where we cannot grant you access to the personal data we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for the refusal.

When contacting us to request access to or correction of any personal data we hold about you, or to withdraw consent in relation to your personal data, we ask that you provide us with as much detail as you can about the data in question as this will help us to retrieve it. Before we provide you with access to your personal data, we may require some proof of identity. Unless we inform you otherwise, we will respond to your request for access or correction within 30 days of receiving your request, and to your withdrawal of consent in relation to your personal data within ten business days of receiving notice.

Contacting us

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your personal data or a possible breach of your privacy, please contact us as per section 12 of the Privacy Policy. We will deal with any complaint as per section 13 of the Privacy Policy.

Appendix 4: USA specific provisions

If you are located in the USA, the provisions of this Appendix 4 apply in addition to the provisions of the Privacy Policy.

For all States except Florida and California

What are your rights?

The provisions of this section apply in addition to section 11 of the Privacy Policy. In some states you have certain rights pertaining to your personal data, including: the right to delete, the right to opt out, the right to access your personal data, and the right not to be discriminated against.

Tracking

We will honour the Global Privacy Control (<https://globalprivacycontrol.org/>). We will not respond to Web browser “do not track” signals. Because we link to social media sites, and from time to time may include third-party advertisements, other parties may collect your personally identifiable information about your online activities over time and across different websites when you visit this site.

Please note that not all tracking will stop even if you delete cookies.

For Florida Residents

Where the Florida Digital Bill of Rights (Fla. Stat. §§ 501.701–501.721) (**FDBR**) applies to our Processing of your personal data, the following additional provisions apply in addition to the provisions of this Privacy Policy.

What are your rights?

The provisions of this section apply in addition to section 11 of the Privacy Policy. As a Florida resident, you may have the right to:

- confirm whether we are Processing your personal data and to access such personal data;
- obtain a copy of your personal data in a portable and, to the extent technically feasible, readily usable format;
- request that we correct inaccuracies in the personal data we hold about you, subject to certain exceptions;
- request that we delete personal data that we have collected from or about you, subject to certain exceptions;
- opt out of the Processing of your personal data for the purposes of: (i) targeted advertising; (ii) the “sale” of your personal data (as that term is defined under applicable Florida law); and (iii) profiling in furtherance of solely automated decisions that produce legal or similarly significant effects concerning you;

- withdraw your consent to our Processing of your Special Categories of Personal Data / Sensitive Data where we have relied on your consent to Process it;
- designate an authorised agent to submit a request to exercise your rights on your behalf. We reserve the right to require written proof of authorisation and to verify the identity of both you and your authorised agent before acting on any such request; and
- not receive discriminatory treatment for exercising any of the above rights.

Opt-out of targeted advertising, sale and profiling

To opt out of targeted advertising, the sale of your personal data, or profiling in furtherance of decisions with legal or similarly significant effects, please contact us using the details set out in section 12 of this Privacy Policy.

We will also honour the Global Privacy Control (<https://globalprivacycontrol.org/>) as a valid opt-out of the sale of your personal data and targeted advertising. We will not respond to web browser "do not track" signals. Please note that not all tracking will stop even if you delete cookies.

Sensitive data

Where we Process Special Categories of Personal Data / Sensitive Data (as defined under the FDBR) about you as a Florida resident, we will obtain your opt-in consent prior to doing so, unless an applicable exception under the FDBR permits us to proceed without consent.

How to submit a request

To submit a request to exercise any of the above rights, please contact us as per section 12 of this Privacy Policy. For your protection, we may need to verify your identity before acting on your request. This may require us to ask certain questions to confirm your identity or to request state-issued identification. We reserve the right to deny a request where we cannot verify your identity.

Response timescales

We will respond to your consumer rights request within 45 days of receipt. Where your request is complex or we receive a number of requests simultaneously, we may extend this period by a further 15 days, in which case we will notify you of the extension and the reasons for it before the expiry of the initial 45-day period.

Appeals

If we deny your consumer rights request in whole or in part, you may appeal our decision by contacting us as per section 12 of this Privacy Policy, clearly marked as an appeal. We will acknowledge receipt of your appeal and provide a written response within 60 days. If your appeal is denied, we will inform you of your right to contact the Florida Attorney General at www.myfloridalegal.com.

Breach notification

In the event of a security breach affecting your personal information (as defined under the Florida Information Protection Act, Fla. Stat. § 501.171 ("FIPA")), we will notify you without unreasonable delay where required by applicable law. Where the breach affects 500 or more

Florida residents, we will also notify the Florida Attorney General within 30 days of determining that a breach has occurred.

Contact and complaints

If you have any queries or complaints about our use of your personal data, please contact us as per section 12 of this Privacy Policy. If you are not satisfied with our response, you have the right to contact:

- the **Florida Attorney General** (www.myfloridalegal.com) in respect of matters arising under the FDBR or FIPA; or
- the **Federal Trade Commission** (reportfraud.ftc.gov) in respect of federal consumer protection matters.

For California Residents

Where California privacy laws apply (if you are a consumer resident in California and where we meet the relevant threshold tests) the following additional provisions apply:

What personal data do we collect? Why do we use your personal data? Who do we share your personal data with and why?

The provisions of this section apply in addition to section 4, section 5 and section 7 of the Privacy Policy.

The information that we collect is set out in the main body of the Privacy Policy. We further detail it below in accordance with California privacy requirements:

Category	Business/Commercial Purpose	Disclosed / "Sold" to Third Parties
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	To perform services on behalf of ourselves, including servicing your account and for the purposes set out in section 5 of the Privacy Policy.	Personal information is sold or disclosed in accordance with section 7 of the Privacy Policy. Recipients include service providers; business partners; our affiliated companies; other users of our websites/applications; and other parties as required for legal and regulatory purposes.
Your signature, physical characteristics or description, telephone number, insurance policy number, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	To perform services on behalf of ourselves, including servicing your account and for the purposes set out in section 5 of the Privacy Policy.	
Personal characteristics, such as your gender, age, date of	To perform services on behalf of ourselves, including servicing your	

birth, citizenship status, and marital status.	account and for the purposes set out in section 5 of the Privacy Policy	
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	To perform services on behalf of ourselves, including servicing your account and for the purposes set out in section 5 of the Privacy Policy.	
Biometric information	N/A	
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet web site, application, or advertisement.	Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards and for the purposes set out in section 5 of the Privacy Policy.	
Geolocation data	To perform services on behalf of ourselves, including servicing your account and for the purposes set out in section 5 of the Privacy Policy.	
Audio, electronic, visual, thermal, olfactory, or similar information	N/A	
Professional or employment-related information	N/A	
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act.	N/A	
Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological	To perform services on behalf of ourselves, including servicing your account and for the purposes set out in section 5 of the Privacy Policy.	

trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.		
Any other such personal information as set out in section 4 of the Privacy Policy.	To perform services on behalf of ourselves, including servicing your account and for the purposes set out in section 5 of the Privacy Policy.	

We may aggregate or de-identify any personal information that we collect in connection with our services, such that the information is no longer personally identifiable or attributable to you. We may use such aggregated information for our own legitimate business purposes without restriction. We do not sell personal information, including personal information of minors under 16 years of age without affirmative authorization.

What are your rights?

The provisions of this section apply in addition to section 11 of the Privacy Policy.

As a California resident, you have the right:

- to request access to the personal information we have about you;
- to request that we delete personal information about you;
- to opt-out of our use, transfer, exchange or disclosure (including to third parties) of personal information about you; and
- not to be discriminated against based upon whether you decide to opt-out.

You have the right to request that we disclose to you what information we collect, use, disclose, and sell. Under California law, “sell,” “selling,” “sale,” or “sold,” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to another business or a third party for monetary or other valuable consideration. You also have the right to request that a business delete any personal information about you which we have collected about you. We do not sell personal information, including personal information of minors under 16 years of age without affirmative authorization.

To submit a request regarding personal data by email, please contact us as per section 12 of the Privacy Policy. Please note for your protection, any request sent to us to access or delete your personal information will be subject to the following verification procedure: upon your submission of a request, we will send an email confirmation to the email address we have on file for you requiring you to confirm your request. When you have completed this two-step process we will verify the information that you provide in your request we have on file for you. We reserve the right to deny your request if we cannot verify your identity. Where we deny your request in whole or in part, we will endeavor to inform you of the denial, provide an explanation of our actions, and provide the reasons for the denial.

We shall not discriminate against you for exercising any of your above rights. You may designate an authorised agent to make a request to exercise your rights on your behalf. Your authorised agent must be able to provide to us written proof that you have authorised the agent to act on your behalf. For your protection, we reserve the right to deny any request from an agent who does not submit proof that they have been authorised to act on your behalf. We reserve the right to deny any request from an agent if we cannot verify your identity or the agent's identity.

Cookies and Similar Technologies

The provisions of this section apply in addition to section 6 of the Privacy Policy.

We will honour the Global Privacy Control (<https://globalprivacycontrol.org/>). We will not respond to Web browser "do not track" signals. Because we link to social media sites, and from time to time may include third-party advertisements, other parties may collect your personally identifiable information about your online activities over time and across different websites when you visit our websites/applications. Please note that not all tracking will stop even if you delete cookies.

Your California Privacy Rights

To confirm, if you are a resident of California, the following applies in addition to the above. You have the right to request that we disclose to you what information we collect, use, disclose, and sell. You also have the right to request that we delete any personal information about you which the business has collected about you. To submit either of the above requests, you may call us toll-free at +1 (833) 9944899. You may also submit your requests as per section 12 of the Privacy Policy.

Please note for your protection, any request sent to us to delete your personal information will be subject to the following verification procedure. If you opt to exercise your privacy rights, we are required to verify your identity in order to prevent unauthorised access to your data. This may require us to ask you certain questions to confirm your identity or require you to provide state-issued identification. Requests to exercise these rights may be granted in whole, in part, or not at all, depending on the scope and nature of the request and applicable law. Where required by applicable law, we will notify you if we reject your request and notify you of the reasons, we are unable to honour your request.

We do not sell your information. You have the right to direct us not to share your information. To exercise this right to opt out of the sharing of personal information or request information about current opt-out status please contact us as per section 12 of the Privacy Policy.

Appendix 5: Complaints Procedure

(a) Raising a complaint

Any Data Subject who believes their personal data has been mishandled in a way that contravenes the DPA 2018 or UK GDPR by the Company may submit a complaint. Common examples include complaints about:

- unlawful Processing of personal data;
- failure to respect Data Subject rights;
- inadequate security measures; or
- non-compliance with data protection principles.

We encourage complaints made to us by contacting us as per section 18 of this Privacy Policy and using a complaint form in Appendix 3. However, we acknowledge that Data Subjects can make a complaint to the Company by any means, including through social media. In these cases, we will ask for alternative contact details so we can respond to their complaint accordingly.

(b) Complaint handling

Step one: Receipt

Before acknowledging any complaint, the Company shall confirm:

- it is the Data Controller of the relevant Processing; and
- the identity of the individual, or the individual's representative.

Step two: Acknowledgement

We will aim to acknowledge complaints within 5 working days of receipt, and in any event no later than 30 calendar days.

Where we do not understand the nature of the complaint, we may need to ask the Data Subject to put the complaint in writing so that we are sure we are responding appropriately. We are also required to ensure the identity of the complainant, and therefore we may ask for further information or documentation to verify the Data Subject's identity if we cannot do so initially.

Step three: Investigate

We will investigate the complaint as soon as practicable after receipt and acknowledgement. This includes:

- reviewing all relevant documentation;
- consulting with relevant colleagues and teams; and
- gathering evidence to determine whether either the DPA 2018 or UK GDPR has been contravened.

Step four: Outcome

We aim to investigate and provide a response to the complaint within one month. This response may include:

- what information has been found by the Company; and
- whether the complaint is upheld or not, and if it is, any corrective actions we have taken or will take.

Where the complaint is complex or particularly challenging, we will inform the Data Subject as soon as possible and keep them informed of any progress, as appropriate.

If the Data Subject is happy with our response, the Company may consider either clarifying / following up our response or confirming that the complaint has been closed.

(c) Documentation

The Company will endeavour to keep records that evidence our compliance with this complaints procedure, including:

- the date we received the complaint;
- the Company's acknowledgement communication;
- any relevant conversations and documentation while investigating;
- the outcome of the complaint, including any actions taken as a result of the investigation.

(d) Right to escalate

The Data Subject has the right to complain directly to the ICO at any point, including during our complaints procedure process. The Company shall ensure it has made the Data Subject aware of their right to complain to the ICO.

Appendix 6: Data protection complaint form

[Your full address]

[Phone number]

[date]

[Name and address of AerFin entity]

[Reference number (if we gave you one)]

Dear [Sir or Madam / name of the person you have been in contact with]

Data protection complaint

[Provide your full name and address and any other details such as account number so we could identify you]

[Give details of your complaint clearly and simply and, if needed, its effect on you.]

Please respond fully within one calendar month. If you can't reply within that time, please tell me when you will be able to reply.

If you'd like to discuss this, please contact me on [telephone number / email address].

Yours sincerely,

[Name]

[Signature]