

## AEROMISSIONS Privacy Policy – European Union’s General Data Protection Regulation GDPR

### I. INTRODUCTION

The General Data Protection Regulation, or GDPR, is a European Union regulation that establishes a new framework for handling and protecting the personal data of EU citizens. It introduces new obligations and liabilities for all organizations that handle personal data and new rights for individuals in respect of their personal data. Organizations must comply with the new rules since 25 May 2018.

Throughout this document any reference to AEROMISSIONS and AEROMISSIONS may be considered as mutually applicable in respect of all obligations, requirements and business process management.

AEROMISSIONS provides EASA Compliant Regulatory and Vocational Training through [www.aeromissions.com](http://www.aeromissions.com) or any other related platform.

At AEROMISSIONS the privacy and security of our customers, respondents and visitors are of paramount importance. AEROMISSIONS is committed to protecting the data you share with us. This privacy policy explains how AEROMISSIONS processes information that can be used to directly or indirectly identify an individual (“Personal Data”) collected through use of its website and platform.

SAS is an EASA Compliant Regulatory Training & Consulting Organization who collects personal data from [www.aeromissions.com](http://www.aeromissions.com) and [www.AEROMISSIONS.com](http://www.AEROMISSIONS.com) and in turn makes us a data controller, AEROMISSIONS and our sister company AEROMISSIONS will use your data to help provide you with information, consultancy & training which in turn makes us also a data processor.

What happens to the Data Collected?

We will use your data to find out your requirements and if you are interested in consultancy & training, we will understand your requirements and provide you with an introduction to the most suited web lead supplier where we may receive a commission for the introduction, we do not produce web leads ourselves.

No Data is processed without a valid reason and we do not share Data with any 3rd Parties for any reason whatsoever.

All information is stored securely and is accessed by authorized personnel only.

AEROMISSIONS implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

We regularly review and update our policies and provide our employees with security training; we perform process audits and conduct risk assessments; and monitor compliance with security policies.

We operate a strict unsubscribe policy so at any time you wish to be removed or excluded from any or all communications we will do so and remove all information from our database.

## 1.2 Classification of Persons Contacting AEROMISSIONS / AEROMISSIONS

User – A user is any person who has cause to engage with either AEROMISSIONS [www.aeromissions.com](http://www.aeromissions.com) or AEROMISSIONS [www.AEROMISSIONS.com](http://www.AEROMISSIONS.com). Users may be considered

Valued Customer – For the purposes of this policy, AEROMISSIONS defines the term “valued customer” as a person or entity with which AEROMISSIONS has an established relationship, consent is continuous and ongoing with a strict unsubscribe remove & delete policy.

Inquirer – the term “Inquirer” as any individual who responds to surveys or contacts AEROMISSIONS or AEROMISSIONS in response to AEROMISSIONS marketing material the inquirer agrees as a function of the engagement that we can process their data in so much as is required to respond with them and engage in meeting their needs and objectives

Visitor – the term “Visitor” as an individual that visits our front-end website (for example [www.aeromissions.com](http://www.aeromissions.com) & [www.AEROMISSIONS.com](http://www.AEROMISSIONS.com)).

Any information stored on AEROMISSIONS’s platform is treated as confidential. All information is stored securely and is accessed by authorized personnel only. AEROMISSIONS implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

## 1.3 Data Protection Officer

AEROMISSIONS has appointed Elena Ivanova Marketing Manager as Data Protection Officer for both AEROMISSIONS and AEROMISSIONS.

Elena Ivanova is responsible for the oversight of the implementation of the Data Protection Program – You may contact her at the following Email [rgpr@aeromissions.com](mailto:rgpr@aeromissions.com)

## II. COLLECTION AND USE OF DATA

### 2.1 .General

AEROMISSIONS [www.aeromissions.com](http://www.aeromissions.com) and AEROMISSIONS [www.AEROMISSIONS.com](http://www.AEROMISSIONS.com) provide the following services for which we need to use data

The personal data we would like to collect / process is:

1.1 Types of information we collect and How we use it

Personal data type

Email Addresses:

Source AEROMISSIONS Collects Data from our websites, customers, direct contacting from our advertising and marketing activities, including LinkedIn and Facebook.

Contact Name:

We will use this to service your enquiry and to ensure we are speaking to the correct person when we make contact.

Contact Number:

We will use this to service your enquiry, we will call you so we can discuss your enquiry with yourself.

Contact Email:

We will use this to service your enquiry, we will email details of the product you have enquired about.

Product Interested In:

We will use this to service your enquiry, we will use this so the relevant person can deal with your enquiry ensuring you receive the best level of service

Time Stamp & Date Stamp Of Enquiry:

We will use this to service your order and for compliance to ensure we can provide proof of enquiry made.

IP Address Enquiry Made On:

We will use this for compliance to ensure we can provide proof of enquiry made.

If You Want To Be Contacted In The Future And How:

We will use the information to contact you in the future and only contact you by the methods you chose.

We provide open and "in company" EASA compliant regulatory training and for this purpose we retain information provided by you for the duration of the engagement.

During a User's registration on AEROMISSIONS's platform, they provide information such as name, company name, email, address, telephone, credit-card number and other relevant data. This information is used by AEROMISSIONS to identify the User and provide them with support, services, mailings, sales and marketing actions, billing and to meet contractual obligations.

AEROMISSIONS does not store any digital financial data following website transactions. AEROMISSIONS will not retain any user data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

a) We provide our valued customers with a regular update of our current activities and information concerning the availability of forthcoming training for this purpose we store names and email

addresses only without any other personal contact information. We provide pro forma invoices and final invoices related to the provision of our services

b) We provide our Inquires with a response to their question which may include a quotation or a request for further information to understand fully the requirement of the Inquirer.) We provide pro forma invoices and final invoices related to the provision of our services

If you are a visitor to our websites. We may record your IP address and use cookies. AEROMISSIONS may add information collected by way of page view activity. Furthermore, AEROMISSIONS may collect and process any Personal Data that you volunteer to us in our website's forms, such as when you register for events or sign up for information and newsletters. If you provide AEROMISSIONS with your social media details, AEROMISSIONS may retrieve publicly available information about you from social media.

## 2.2 Ensuring our Email and Essential Data Integrity is Maintained

AEROMISSIONS uses company email managed by OVH Ensuring Email Integrity is Maintained by using HTTPS encrypted connections whenever users log in to OVH, no matter the security of the Internet connection they're on, because the company will be keeping emails encrypted as they move around OVH's servers and from one data center to another.

We operate a strict unsubscribe policy so at any time customers request to be removed or excluded from any or all communications we are able to remove all information from our database using search & delete function

## 2.3 Website Visitors

If you are a Visitor to our website only, and not for example a valued customer or enquirer to a survey or a user of our platform, then this section is relevant for you.

By visiting [www.aeromissions.com](http://www.aeromissions.com), you consent to the collection and use of your Personal Data as described herein. If you do not agree with the terms set out herein, please do not visit this website. If required by applicable law, we will seek your explicit consent to process Personal Data collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible.

AEROMISSIONS may collect, record and analyze information of Visitors to its website. We may record your IP address and use cookies. AEROMISSIONS may add information collected by way of page view activity. Furthermore, AEROMISSIONS may collect and process any Personal Data that you volunteer to us in our website's forms, such as when you register for events or sign up for information and newsletters. If you provide AEROMISSIONS with your social media details, AEROMISSIONS may retrieve publicly available information about you from social media.

Such Personal Data may comprise your IP address, first and last name, your postal and email address, your telephone number, your job title, data for social networks, your areas of interest, interest in AEROMISSIONS products, and certain information about the company you are working for (company name and address), as well as information as to the type of relationship that exists between AEROMISSIONS and yourself.

AEROMISSIONS gathers data about visits to the website, including numbers of Visitors and visits, Geo-location data, length of time spent on the site, pages clicked on or where Visitors have come.

### *2.3.1 Purpose of processing personal data*

AEROMISSIONS uses the collected website data to communicate with Valued Customer, Inquirers and or Visitors, to customize content and to improve our website by analyzing how Visitors navigate our website.

We will use your data to help us service your enquiry.

We will use your data to help us manage any service you take out with us.

If you opted in for marketing in the future in regards to new products we offer we will only contact you on your preferred method with details of new products or news from AEROMISSIONS such as a newsletter.

Our legal basis for processing for the personal data:

If you decided to enter into a business agreement with AEROMISSIONS under the contract, we will need to process your details to service your order.

The special categories of personal data:

We do not process any special categories. We have included a list of what these categories are for your records under GDPR.

- Racial
- Ethnic origin
- Political opinions
- Religious beliefs
- Philosophical beliefs
- Trade union membership
- Genetic data
- Biometric data
- Health data
- Data concerning a natural person's sex life
- Sexual orientation

### *2.3.2 Sharing personal data*

AEROMISSIONS does not share any personal data with third parties – nor do we seek personal data from third parties.

Employees working for AEROMISSIONS and AEROMISSIONS have access to data appropriate to their job role. All employees have received security training delivered by AEROMISSIONS Data Protection Officer in addition all employees have signed a non disclosure agreement.

### *2.3.3 Cookies*

Cookies are small pieces of information sent by a website to a Visitor's hard disk. Cookies cannot be used to run programs or deliver viruses to your computer. By continuing to visit our website, you

agree to the placement of cookies on your device. If you choose not to accept our cookies, we cannot guarantee that your experience will be as fulfilling as it would otherwise be.

Currently AEROMISSIONS or AEROMISSIONS does not use cookies however this practice may be reviewed in the future.

We may also place cookies from third parties for functional and marketing purposes. The use of cookies is widespread and benefits the surfer. For further information, see AEROMISSIONS Cookie Policy.

#### *2.3.4 Links to other sites*

Please be aware that while visiting our site, Visitors can follow links to other sites that are beyond our sphere of influence. AEROMISSIONS is not responsible for the content or privacy policy of these other sites.

#### *2.3.5 Security*

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

#### *2.3.6 Rights of Access, Rectification, Erasure and Restriction*

You can modify, update, or delete your account information at any time by contacting us at [rgpr@aeromissions.com](mailto:rgpr@aeromissions.com). You may inquire as to whether [rgpr@aeromissions.com](mailto:rgpr@aeromissions.com) is Processing Personal Information about you and ask that we correct, amend or delete your Personal Information where it is inaccurate by contacting us at [rgpr@aeromissions.com](mailto:rgpr@aeromissions.com). Please include your full name and email address and a detailed description of your data request. Such requests will be processed in line with local laws. We will respond to any requests for access to personal information within 30 days.

## 2.4 Website Visitor Response

Visitors to AEROMISSIONS Website should be aware that in responding to surveys or survey invitations, they could be disclosing information that could make them personally identifiable to AEROMISSIONS.

AEROMISSIONS will not process Personal Data of Respondents for other purposes or by other means than instructed by its Users.

#### *2.4.1. Inquires*

If you wish to inquire about your Personal Data that may have been collected in any way by AEROMISSIONS, we ask you to contact [rgpr@aeromissions.com](mailto:rgpr@aeromissions.com) AEROMISSIONS is the Processor of your data and no other agency is involved in this activity.

## 2.4 Users

### 2.4.1. General

In order to provide services to its Users, AEROMISSIONS collects certain types of data from them.

### 2.4.2 Collection of User data

AEROMISSIONS and AEROMISSIONS Surveys are used for gathering feedback and to understand opportunities for service improvement

AEROMISSIONS will not process Personal Data for other purposes or by other means than instructed by its Users.

The purpose of collecting Personal Data as part of a survey will vary depending on the survey, as set up by AEROMISSIONS's Users.

AEROMISSIONS may provide from time-to-time surveys For Users in the EEA, or for Users providing surveys to Respondents in the EEA, AEROMISSIONS will be the "controller", as defined in the Directive and the GDPR.

AEROMISSIONS will not retain User data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

### 2.4.3 Collection of Respondent data

Surveys used for gathering feedback are created by Users, who make them available to relevant businesses, organizations, and individuals. It is the User's responsibility to ensure that collection and processing of data is done in accordance with applicable law. AEROMISSIONS will not process Personal Data for other purposes or by other means than instructed by its Users.

Respondent data includes data from individuals uploaded, transferred or manually entered by a AEROMISSIONS User into their account for the purpose of providing feedback to the User by responding to surveys. Personal Data may include, personal contact information such as name, home address, home telephone or mobile number, email address, information concerning family, lifestyle and social circumstances including age, date of birth, marital status, number of children, employment details, education/qualification, business contact details, gender, religion, race, health detail and other sensitive Personal Data. Answers to questions by Respondents, may also include Personal Data.

The purpose of collecting Personal Data as part of a survey will vary depending on the survey, as set up by AEROMISSIONS's Users. As AEROMISSIONS provides surveys to a wide group of customers and businesses, the purpose may vary greatly. For Users in the EEA, or for Users providing surveys to Respondents in the EEA, the User will be the "controller", as defined in the Directive and the GDPR. The purpose will consequently be defined by AEROMISSIONS's User.

If you or your organization are required under the European Union's General Data Protection Regulation (GDPR) to enter into a contract, or other binding legal act under EU or Member State law, with your data processors, review and accept AEROMISSIONS's Data Processing Agreement in your AEROMISSIONS account.

Processing in the European Economic Area (EEA)

For Users with accounts located in AEROMISSIONS's European Data Region, all processing of Personal Data is performed in accordance with privacy rights and regulations following the EU Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 (the Directive), and the implementations of the Directive in local legislation. From May 25th, 2018, the Directive and local legislation based on the Directive will be replaced by the Regulations (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation (GDPR), and AEROMISSIONS's processing will take place in accordance with the GDPR.

#### 2.4.4.1.1 Controller

AEROMISSIONS processes Personal Data both as a Processor and as a Controller, as defined in the Directive and the GDPR:

For Respondent data, as outlined in the "Collection of Respondent data" section, AEROMISSIONS will be the Controller in accordance with Directive and GDPR, and AEROMISSIONS will be the Processor.

AEROMISSIONS adheres to the Directive of 1995 and the GDPR from May 25th, 2018. Consequently, AEROMISSIONS processes all data provided by its Users with accounts in its European Data Region, in the European Economic Area (EEA) only.

All data collected by AEROMISSIONS Users through surveys will be stored exclusively in secure hosting facilities provided by Dropbox.

AEROMISSIONS. All processing is performed in accordance with the highest security regulations. All transfers of data internally in the EEA is done in accordance with this data processing agreement.

### III. RETENTION AND DELETION

AEROMISSIONS will not retain data longer than is necessary to fulfill the purposes for which it was collected or as required by applicable laws or regulations.

For Respondent data, AEROMISSIONS's has control of the purpose for collecting data, and the duration for which the Personal Data may be kept. For Respondent data, Users with an active account will therefore have the responsibility to delete data when required. When a user's account is terminated or expired, all Personal Data collected through the platform will be deleted, as required by applicable law.

### IV. ACCEPTANCE OF THESE CONDITIONS

We assume that all Visitors of our website, Respondents to surveys powered by AEROMISSIONS and users AEROMISSIONS's platform have carefully read this document and agree to its contents.

If someone does not agree with this privacy policy, they should refrain from using our website and platform. We reserve the right to change our privacy policy as necessity dictates. Continued use of AEROMISSIONS website and platform after having been informed of any such changes to these conditions implies acceptance of the revised privacy policy.

This privacy policy is an integral part of AEROMISSIONS's Terms and Conditions



## V. OUR LEGAL OBLIGATION TO DISCLOSE PERSONAL INFORMATION

We do not normally share your personal data with third parties, however should this be necessary in the future for valid business reasons we will only pass your personal data on to third-party service if you provide us with explicit consent.

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfill the service they provide to you we will have no affiliation to the service they provide but may receive a commission for the introduction.

When they no longer need your data to fulfill this service, they will dispose of the details in line with AEROMISSIONS procedures.

If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

We will reveal a user's personal information without his/her prior permission only when we have reason to believe that the disclosure of this information is required to establish the identity of, to contact or to initiate legal proceedings against a person or persons who are suspected of infringing rights or property belonging to AEROMISSIONS or to others who could be harmed by the user's activities or of persons who could (deliberately or otherwise) transgress upon these rights and property. We are permitted to disclose personal information when we have good reason to believe that this is legally required.

## VI. AEROMISSIONS'S DATA PROTECTION OFFICER

AEROMISSIONS has a "Data Protection Officer" who is responsible for matters relating to privacy and data protection. This Data Protection Officer can be reached at the following address:

AEROMISSIONS  
Attn: Data Protection Officer, 18 Avenue Jean Jaurès 35400 SAINT MALO  
France  
rgpr@aeromissions.com

## VII. FOR FURTHER INFORMATION

If you have any further questions regarding the data AEROMISSIONS collects, or how we use it, then please feel free to contact us by email

AEROMISSIONS  
Attn: Data Protection Officer, 18 Avenue Jean Jaurès 35400 SAINT MALO  
France, email: rgpr@aeromissions.com