



GLOBAL JET
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PRIVACY POLICY

1° - Who we are

With a long story of international operation, Global Jet group has proven its exceptional know-how and become a benchmark for private aircraft management, operation and charter. Our vast expertise not only allows us to manage a large fleet of aircraft worldwide, but – more importantly – also enables us to offer individual and tailor-made solutions to our customers.

As member of Global Jet group, Global Jet Spain S.L (“**GJS**”), based in Madrid (Spain), is in particular responsible for the organization of flights for aircraft owners and charter customers.

For flights performed with aircraft operated by Global Jet Luxembourg SA or Global Jet Austria GmbH, GJS acts as direct representative of the operator. For flights performed with other aircraft, GJS acts as agent of the client and charters the aircraft from the operator, acting on behalf of the client.

GJS is not itself an aircraft operator, does not act as air carrier, does not provide air transportation services and is not a party to the carriage agreement between the client and the operator.

2° - What this document covers

This Privacy Policy concerns the following persons, to the extent the same are natural persons (collectively or each individually, as applicable, “**you**”):

- our customers, including the owners of the aircraft that are managed by any Global Jet entity and all charter customers for which we arrange charter flights, in our capacity as intermediary between the operators of the aircraft and the clients;
- all passengers who travel on board the aircraft on which we arrange flights;
- our partners and suppliers with whom we work in order to provide our services to our customers and the aforementioned passengers; and
- the shareholders, partners, affiliates, officers, directors, employees, agents, representatives, servants, auxiliaries, successors and assigns of the aforementioned persons.

The respect of your privacy has always been one of our priorities. GJS has put in place processes with a set of strong privacy principles in mind.

The General Data Protection Regulation (Regulation (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, and repealing Directive 95/46/EC; the “**GDPR**”), entered into force on May 25th, 2018, may be applicable to certain activities of GJS.

The GDPR sets out principles for personal data management and rights of individual as to their personal data. As a responsible and forward looking business, GJS complies with the GDPR (when applicable) and ensures that effective measures are in place to protect your personal data.

As part of abiding by our legal obligations, we have put in place this Privacy Policy, which is developed through the following main points:

- the personal data collected about you;
- the use of your personal data;
- the way we secure your personal data;
- your rights as regards personal data collected and processed by us.

This Privacy Policy shall not grant, and shall not construed as granting, to any person more rights than those rights (if any) granted by the GDPR to such person.

3° - What personal data we collect about you

In order to perform our activity and provide our services, GJS must receive or collect some information.



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It helps us to operate, provide, improve and customize our services. The types of data we are receiving/collecting depend on how you act or use our services. Personal data can be gathered from different ways: directly from the data subject, automatically or from third parties (in particular from our customers, when you are a passenger for whom a customer books a flight).

Please find below a non-exhaustive list of personal data collected by GJS:

- surname and name, gender, address, e-mail address, phone number and other contact details;
- date of birth, place of birth, marital status;
- position within a company and/or family connections;
- copy of official documents (such as passports, visa, etc.);
- passport details (nationality, number and date of expiry);
- office / company's offices and postal address;
- geographic location and trip details (including data regarding your baggage);
- credit card data, bank account data;
- preferences and tastes, in particular with respect to catering, press and entertainment onboard the aircraft;
- medical condition (e.g. allergies and disabilities) and dietary requirements; and
- any other information that may be required by us to (i) carry out and fulfil our contractual obligations, (ii) provide our services and/or (iii) comply with our legal and regulatory obligations.

We need to collect, process and/or transfer most of these personal data in order to perform our legal and contractual obligations and provide our services (requested by you or provided in your favor). If you fail to provide such personal data, we will not be in a position to perform our legal and contractual obligations and/or provide our services.

GJS further provides certain intranet/extranet services, electronic and communication devices services and specific software, useful or linked to the provision of its aeronautical services. When you connect to or use said tools through computers or electronic devices, GJS collects and stores certain information including IP addresses or device's IDS, as well as information about your activity on our intranet/extranet, software and tools (date and time of connection).

Our website (www.globaljetconcept.com) may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

4° - How we use personal data

We collect, use and process your personal data to:

- provide our services to our customers and the passengers in accordance with the contractual relationships established with our customers, in particular within our core business consisting in organizing charter flights for our customers, acting as intermediary between the client and the operator of the aircraft;
- provide our services in a diligent, individual and tailor-made manner;
- comply with our legal and regulatory obligations;
- improve, fix and customize our services;
- protect our legitimate interests.

We collect, use and share your personal data lawfully, fairly and in a transparent manner. GJS processes your personal data in the following cases (in particular in accordance with article 6 of the GDPR):

- you have given your consent to GJS to the processing of your personal data for one or more specific purposes;



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- the processing of your personal data is necessary to perform a contract entered into with you or to provide a service to you, in particular organizing your flight;
- the processing of your personal data is necessary to comply with a legal obligation to which GJS is subject;
- the processing of your personal data is necessary to protect your vital interests or those of another natural person: we may use personal data to ensure the security and safe operation of our activities and of the aircraft;
- the processing of your personal data is necessary to perform a task carried out in the public interest or in the exercise of official authority vested in GJS: GJS shall comply with strict regulations applicable to the aviation sector, requiring the collection, processing and as the case may be disclosure of certain personal data to public authorities such as customs, airport authorities or other national or governmental authorities; or
- the processing of your personal data is necessary for the purposes of the legitimate interests pursued by GJS or by a third party, including our interests in providing an innovative, relevant, safe, individual, tailor-made and profitable service to our customers and partners, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

GJS may then process your personal data to further:

- provide you with information that you have requested or which we think may be relevant to a subject, in which you have demonstrated an interest;
- manage all communications between you and us: as our activity requires a consistent and extensive level of contact with our customers, we also use your personal data to contact you and respond to you when you contact us;
- undertake, manage and comply with our accounting, administrative and legal duties and obligations.

Personal data collected by GJS is not transferred to any third party for marketing purposes.

Medical data:

GJS may collect and process medical data (i) which you agreed to provide and/or (ii) when GJS has the legal obligation to gather and maintain personal data and information relating to your medical status. Such information is not used or processed by GJS in any manner other than for the strict purpose of complying with applicable laws and regulations. Medical data are collected, maintained and processed in compliance with the GDPR and only:

- if you have given your explicit consent to the processing of those medical personal data for one or more specified purposes;
- if the collection and processing of said medical personal data is necessary for reasons of substantial public interest, on the basis of applicable law which shall be proportionate to the aim pursued, especially aviation laws and regulations;
- said processing is necessary for the establishment, exercise or defense of legal claims involving GJS or whenever courts are acting in their judicial capacity.

5° - Limited communication of personal data to third parties

For the purpose of the provision of our services and the performance of our obligations (whether legal or contractual), your personal data may be collected, used and processed by GJS, as data controller and/or processor. We will not sell, share or otherwise distribute your personal data to third parties except as provided in this Privacy Policy.

Our business activities and the services we provide require that we share certain personal data with third parties. The provision of our services may require the communication of your personal data to:

- the operators of the aircraft performing the flights;
- our sub-contractors and service providers;
- other service providers such as airport operators, handling agents, limousine companies, insurance companies, hotels or other companies needed to deliver the services you have



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- requested (or which have been requested for you);
 - States, governmental bodies, authorized authorities, agencies or administrations as required under any applicable law, such as customs and immigration authorities or other competent authorities; and
 - other third parties, in a view to protect our rights or the security or safety of our customers, employees and assets, and the assets of third parties (including the aircraft),
- in each case whether located in the European Union (and then submitted to the GDPR) or outside the European Union.

The communication of your personal data to operators, sub-contractors and other third-party service providers has always for purpose and is strictly limited to the provision of services to you, or the performance of our contractual obligations.

Please note that when you use third-party services directly, such service providers may apply their own terms and privacy policies governing your use of those services.

Communication of personal data outside of the European Union:

GJS may have to communicate certain personal data to recipients (in particular aircraft operators, handling agents and limousine companies) located in countries outside of the European Union, in which case such communication is:

- strictly necessary for the performance of a contract between you and GJS (or any person for which we act as direct representative) or the provision of services requested to GJS (in particular, the organization of flights for you);
- made to States, governmental bodies, authorized authorities, agencies or administrations as required under any applicable law;
- strictly necessary for the conclusion or performance of a contract concluded in your interest between GJS (whether in its name or in the name of another party, including you) and the data recipient;
- covered by agreements between GJS and the data recipient having for purpose to implement standard data protection clauses adopted by the European Commission or other solution complying with the GDPR;
- necessary for the exercise or enforcement of our rights; or
- otherwise permitted under article 49 of the GDPR.

6° - How we secure your personal data

We consider the confidentiality of your personal data as a matter of the utmost importance. To ensure the security and the confidentiality of your personal data, we use *inter alia*, as a matter of principle, protected data networks, industry standard electronic means (firewalls) and password protection.

When collecting, using or processing your personal data, we always take measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction.

Personal data held by GJS is kept and maintained through secured electronic means, in premises controlled by GJS or as the case may be out of our premises with third party service provider's data centers applying the utmost degree of care of our data, bound with us by strict confidentiality undertakings and submitted to the provisions of the GDPR.

Access to your personal data is generally restricted. Personal data held by GJS is accessible to and controlled only by our management and designated employees having a need to know such information for the purposes described in this Privacy Policy.

In the performance of our contractual relationships, certain of your personal data held by us may be accessible to you by way of electronic means, devices, software or intranet/extranet. Such means of communication granting to you an access to your personal data held by us are secured by login and password.



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Software, electronic tools and our intranet/extranet have been developed and are used by GJS following a privacy and data protection by design approach, to provide the highest degree of protection of your personal data.

Security patches are analyzed and applied on our servers/computers/software. Devices security tests are performed periodically. We further regularly verify accounts and activities and promote safety and security on and of our services, such as by investigating suspicious activity or violations of our terms, and to ensure that our services are being used legally.

7° - Duration of storage of your personal data

GJS stores and maintains your personal data in our database for the following durations:

- in case of contractual relationship established between you and GJS (or any person for which we act as direct representative) or in case of provision of services in your favor, your personal data is kept during our relationship and after its termination, unless you expressly ask us to delete your personal data (without prejudice to our right to nonetheless keep it in accordance with the next paragraphs); keeping your personal data allows us to better meet your expectations should we be contacted for further services in the future;
- in accordance with any applicable laws and regulations, notably aviation regulations and limitation periods, for the duration that is necessary to GJS to meet any legal obligation;
- to protect our legitimate interests and as the case may be the legitimate interests of third parties, as permitted and subject to the provisions of the GDPR.

8° - What your rights are regarding your personal data

The GDPR sets forth your rights regarding your personal data collected and held by GJS. At any time, you have the right to access, rectify, port and erase your personal data. In some cases, you also have the right to restrict and object to the processing of your personal data.

- **Right to be informed:** by the following "Privacy Policy", GJS provides a clear and transparent information about our data processing activity. This "Privacy Policy" may be updated from time to time, without prior notice and with immediate effect, and is accessible on our website (www.globaljetconcept.com);
- **Right of access:** you may at any time request a copy of your personal data held by our company;
- **Right to rectification:** in case you believe we are using inaccurate or incomplete personal data about you, you can correct or complete it, at any time.
- **Right to erasure:** you can request us to delete your personal data. This right will be applied only if we do not have any legal basis or legitimate reasons to keep/use your personal data.
- **Right to restriction of processing:** you can ask us to stop processing your personal data. In that case, GJS still holds the personal data, but will not further process it.
- **Right to data portability:** it gives individuals the right to move, copy and transfer their personal data from one IT structures to another one, in a safe and secure way, without degrading its usability.
- **Right to object:** this right is applicable only in certain cases. However, you have always the right to object to processing for the purpose of direct marketing.
- **Right to withdraw consent at any time:** when you have consented to the collection and processing of your personal data, you may at any time withdraw your consent; however without affecting the lawfulness of processing based on your consent before its withdrawal, and subject to performance of further obligations or services that you might require from GJS.
- **Right to lodge a complaint:** you have the right to lodge a complaint with a supervisory authority if you consider that the processing of personal data relating to you infringes the GDPR.



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9° - Contact

Contact of the data controller:

Global Jet Spain S.L
Terminal de Aviacion Ejecutiva
Hispanidad, S/N
CP 28042
Madrid
Spain

is the data controller as defined in the GDPR.

Any request you may have regarding your personal data shall be signed, addressed with your details (name and address), and a readable copy of your passport or ID in order to allow us to verify your identity.