

## On-Track Aviation Limited - Privacy Policy

### 1. Preamble

- a. This Privacy Policy (hereinafter referred to as the “Policy”) regulates the collection, use, handling and retention of all personal data of data subjects (defined below, including but not limited to customers, job applicants, employees and former employees) collected by On-Track Aviation Limited (hereinafter referred to as the “Company”)

### 2. Objective

- a. The Policy aims to ensure that all personal information of data subjects collected by the Company is managed and used at all times in accordance with the applicable legal requirements in the territories and countries where the Company carries out its businesses.

### 3. Policy Statement

- a. The Company regards the personal data privacy of its customers, job applicants, employees and former employees and other data subjects as a matter of utmost importance.
- b. The Company will apply and follow the GDPR and work with the ICO to maintain the data privacy of its customers, job applicants, employees, former employees and other data subjects.
- c. The Company will collect, process, maintain, use and retain personal data that is required in carrying out its businesses from time to time and will do so by means which are lawful and fair.
- d. The Company will collect personal data only for lawful purposes, and ensure that the collection of data is necessary for or directly related to that purpose, and is not excessive in relation to that purpose.
- e. The Company will only use personal data collected for the originally stated purposes (or a purpose directly related to those purposes), and will not use the personal data for other purposes unless agreed with the data subject or as otherwise permitted by applicable law.
- f. The Company will take all practicable steps to ensure the accuracy of personal data collected and maintained by it, and will retain personal data only for as long as it is required for the fulfilment of the purposes (including any directly related purpose) for which the data is to be used.
- g. The Company will take all practicable steps to ensure that all personal data will be stored securely and will be at all times accessible only by authorised personnel and cannot be disclosed to or accessed by any unauthorised person.
- h. The Company will provide appropriate training to its employees with regard to the collection, use, handling and retention of personal data.
- i. The Company will take all reasonable steps to ensure that all its employees shall respect the personal data privacy of all data subjects and comply with the requirements of this Policy, the GDPR and all other applicable laws and regulations relating to data privacy.
- j. The Company will take all practicable steps to ensure that information about the types of personal data collected, processed and maintained is available to data subjects.
- k. The Company will provide all data subjects with access to and the ability to correct personal data held by the Company, in accordance with the GDPR and all other applicable laws and regulations.
- l. The Company will take all practicable steps to provide a data subject with a copy of its policies and practices relating to his/her personal data at his/her request in accordance with the GDPR and all other applicable laws and regulations.
- m. The Company will only use personal data and provide personal data to third parties, with legitimate business interests, in accordance with the requirements under the GDPR.

- n. The Company will take all practicable steps to ensure that third party data processors engaged by the Company will abide by the personal data protection as set out in this Policy and the GDPR.
- o. The Company will apply the principles of personal data protection as set out in this Policy in every territory and country in which the Company operates, subject to any local legal requirements (as to which, see Part 9 below).

#### 4. Legal Basis for Data Processing under Article 6(1) of the GDPR

- a. To process your information, we mainly rely on the following legal bases:
  - i. Contract:  
The use of your personal information is necessary to provide you with a quotation for our services and to deliver those services to you.
  - ii. Legal Obligation:  
Commission Regulation (EU) No 1178/2011 of 3 November 2011 Annex VII requires we record and retain your personal information during the time our service is being provided to you. On completion of the service your personal information will be archived for the period specified in the Regulation.
  - iii. Consent:  
We may rely on your consent to use your personal information to help us provide services to you. You may withdraw your consent at any time, please contact us using the details provided at the end of this policy.

#### 5. Scope

- a. The Policy applies to all personal data collected, processed, used and/or maintained by the Company as data user in relation to a number of areas of activities carried on by the Company, and data subjects, including but not limited to:
  - Customers who complete courses of training or tests with the Company.
  - Customers who attend seminars with the Company.
  - Customers and other individuals who use the online services available at the Company's website.
  - Customers who submit enquiries and feedback.
  - Customers who use or may use any of the services or consume any of the products, and other individuals who participate in activities, of the Company.
  - Customers who have or continue to have a business relationship with the Company.
  - Business partners and vendors who are individuals and who work with or for the Company to provide products or services to the Company.
  - Job applicants of the Company.
  - Employees, temporary workers, consultants, independent contractors and any other persons working for or in connection with the Company's business.
  - Former employees, temporary workers, consultants, independent contractors and any other persons who have worked for or in connection with the Company's business.

#### 6. What information do we collect about you?

- a. We need information about you to be able to offer our range of services. We need to collect information from you to do this and to offer you the right service or product for your circumstances.
- b. This can include personal information about you, information that we collect electronically (e.g. email, websites, etc) and information we collect from other sources (e.g. CAA, other training organisations, etc)

## 7. Definitions

“controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

“consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

“GDPR” means the General Data Protection Regulations 2017 (GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data as it may be amended from time to time.

“ICO” means the Information Commissioner's Office.

“controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

“data” means any representation of information (including an expression of opinion) in any document, and includes a personal identifier.

“personal data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“filing system” means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

“data subject” in relation to personal data, means the individual who is the subject of the data.

“data processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

“processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“third party” means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## 8. Protecting your Data

a. The Company will comply with the GDPR and will strive to implement policies and guidelines to ensure compliance. These are summarised as follows:

i. Processed lawfully, fairly and in a transparent manner in relation to individuals.

- Personal data shall only be collected for a lawful purpose directly related to the Company's functions and activities, and the collection of data shall be adequate but not excessive for that purpose;
- Personal data shall be collected by means which are lawful and fair in the circumstances of the case;
- On or before the time of collecting the personal data, all practicable steps shall be taken to ensure that the data subject is aware of whether it is obligatory or voluntary for him/her to supply the data, and the consequences for him/her of a failure to supply the data;
- The data subject is informed of the purpose for which the data is to be used and the classes of persons to whom the data may be transferred; and
- The data subject is informed of his/her rights to request access to, and correction of, the data collected from him/her, and the name/job title and address of the Company's designated Data Controller to whom any such request may be made.

ii. Collected for specified, explicit and legal purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

- All practicable steps shall be taken to ensure that personal data collected by the Company is accurate. Where there are reasonable grounds for believing that the data is inaccurate, the data shall not be used, or otherwise disclosed to any third party;
- All practicable steps shall be taken to ensure that personal data is not kept longer than is necessary for the fulfilment of the purpose(s) (including any directly related purpose) for which the data is to be used.
- If the Company engages a data processor, whether within or outside the UK, to process personal data on the Company's behalf, the Company must adopt contractual or other means to prevent any personal data transferred to the data processor from being kept longer than is necessary for processing of the data.

iii. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

- Personal data shall not, without the consent of the data subject, be used for any new purpose.

iv. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

- We work hard to keep your data safe. We use an appropriate combination of technical and organisational measures to ensure, as far as reasonably possible, the confidentiality, integrity and availability of your information at all times having particular regard to:
  - The kind of data and the harm that could result if any of those things should occur;
  - The physical location where the data is stored;
  - Any security measures incorporated, whether by automated means or otherwise, into any equipment in which the data is stored;

- Any measures taken for ensuring the integrity, prudence and competence of persons having access to the data; and
  - Any measures taken for ensuring the secure transmission of the data.
- v. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- All practicable steps shall be taken to ensure that a person will be able to:
    - Ascertain the Company's policies and practices in relation to personal data;
    - Be informed of the kind of personal data held by the Company;
    - Be informed of the main purposes for which the personal data held by the Company is or is not to be used.
- vi. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- A data subject shall be entitled to ascertain whether the Company holds his/her personal data; and
  - A data subject shall be entitled to request access to, and correction of, his/her personal data in accordance with the GDPR and other applicable laws and regulations.

## 9. Engaging Data Processors

- a. If the Company engages a data processor, whether within or outside UK, to process personal data on the Company's behalf, the Company must adopt contractual or other means to:
- Prevent any personal data transferred to the data processor from being kept longer than is necessary for processing of the data; and
  - Prevent unauthorised or accidental access, processing, erasure, loss or use of the data transferred to the data processor.

## 10. Information we collect through your use of our Website

- a. We collect information through the use of technologies such as website analytics (identify cookies) to enable us to improve your online experience.
- b. The use of these technologies helps us understand how you use our website and view our products and services so we can enhance our overall product and service offering to you.
- c. When you visit our website we may record your device information including IP address, hardware and software used, general location, and when and how you interact with our website.
- d. This information is used to note your interest in our products and services and to improve your experience.

## 11. Transferring your Information outside of the European Economic Area (EEA)

- a. In order to provide our services, the information you give us may be transferred to countries outside the EEA. These countries may not have similar data protection laws to the UK. When we do transfer your personal data outside of the EEA, we ensure that any party with access to your information has implemented the necessary security and privacy measures, to ensure that your personal data is kept secure and confidential as outlined in this policy.

## 12. Complaints

- a. We work hard to ensure that your personal information is treated safely and securely. However, if you have a complaint, write to us using the contact details in this policy, or talk to a member of the team. You also have the right to complain to the ICO.

## 13. Access to your Information and Correction

- a. All requests for access to data, or correction of data, or for information regarding policies and practices and types of data held, should be addressed to the Data Controller in the Company at the following address:

Data Controller, On-Track Aviation Limited, Wellesbourne Mountford Aerodrome, Loxley Lane, Wellesbourne, Warwickshire CV35 9EU

## 14. Changes to our Privacy Policy

- a. We review our Privacy Policy regularly and will place any changes/updates on our website.