Fexco UC

Privacy notice relating to GATs website

Version 2.0

Fexco Technology Solutions

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A. INTRODUCTION

Our privacy notice will help you understand what information we collect at Fexco, how Fexco uses it, and what choices you have.

When we talk about “Fexco,” “we,” “our,” or “us” in this Notice, we are referring to Fexco Limited Company, registered in Ireland under number 83934, with a registered address at FEXCO Centre, Iveragh Road, Killorglin, Co. Kerry, Ireland and our Affiliates. “**Affiliates**” in this context means any entity that directly or indirectly controls, is controlled by, or is under common control with us, and "**Control**" means direct or indirect ownership or control of more than 50% of the voting interests of the subject entity.

Fexco operates the website, https://e-gats.aero/, (the “**Website**”) on behalf of the Aviation Working Group (“**AWG**”) for the purpose of hosting the Global Aircraft Trading System (“**GATS**”). Fexco also operates the GATS HelpDesk. Fexco acts as a data processor in the context of these processing activities, except for the purposes outlined in this notice in which case Fexco will act as an independent data controller. Further details on AWG's processing activities are described in the AWG Privacy Policy which is available for view here: AWG Privacy Policy.

When we talk about the “**Verification Process**” in this notice, we are referring to the identity verification procedure which we carry out and which forms part of the GATS Digital Certificate User registration process details of which are set out in the Website Terms of Use and in the GATS Digital Certificate Policy and Certification Practice Statement.

The Website Terms of Use and the GATS Digital Certificate Policy and Certification Practice Statement are available for view here: Website Terms of Use and Digital Certificate Policy

This Privacy Notice sets out the basis on which any Personal Data which we collect from you, or that you provide to us, will be processed by us. It applies to all persons who apply through the GATS Platform to become a Digital Certificate User. Also, where indicated, it applies to all persons who contact the GATS HelpDesk. This Privacy Notice will be reviewed from time to time to take into account changes in the law or changes in how we process your personal data. We would encourage you to check this Privacy Notice regularly to stay informed of the purposes for which we process Personal Data.

In this Privacy Notice, the term “**Personal Data**” means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, our possession, and includes personal data as described in Data Protection Legislation (as defined below).

By (i) registering for a Digital Certificate User account (“**Your Account**”) on the Website (or submitting an application for registration), (ii) using Your Account or (iii) accepting the Website Terms of Use, you indicate that you have reviewed those Website Terms of Use and agree to be bound by them (including the data protection provisions therein). You will also be required to expressly confirm that you have read and understand this Privacy Notice before registering for Your Account (or before continuing to use Your Account). If you are unable to provide such confirmation, then you will be unable to proceed with the Verification Process or use Your Account.

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We will handle your Personal Data in accordance with Data Protection Legislation. "**Data Protection Legislation**" means the Irish Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 ("**GDPR"**) and any other applicable law or regulation relating to the processing of personal data and to privacy including Directive 2002/58/EC ("**E-Privacy Directive**") and the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011 ("**Irish E-Privacy Regulations**"), as such legislation shall be amended, revised or replaced from time to time.

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B. INFORMATION WE COLLECT AND RECEIVE

We fully respect your right to privacy including in relation to the Verification Process and endeavour to be transparent in our dealings with you as to what information we will collect and how we will use your information. Also, we only collect and use an individual's information where we are legally entitled to do so. Further information in relation to the nature of a data controller's data protection obligations under Irish law, including the legal bases upon which Personal Data may be processed, is available on www.dataprotection.ie, the website of the Irish Data Protection Commission ("**DPC**").

Types of Personal Data processed by Fexco

Personal Data submitted to Fexco in connection with the purposes referenced in this Privacy Notice is referred to in this Privacy Notice as "**Customer Data**." Where Fexco collects or processes Customer Data for the purposes outlined in this Privacy Notice, it does so as an independent data controller.

We endeavour to keep Customer Data accurate and up-to-date.

1. Processing by Fexco in connection with its role as Certificate Authority of GATS Digital Certificates

The Customer Data that Fexco collects and receives in connection with its role as Certificate Authority of GATS Digital Certificates includes the following:

- Pictures of your ID documents (driver's licence or passport);
- Photographic and video images of you when you provide us with a "selfie" photo and video clip;
- Subject to your consent, biometric data (i.e. facilitating facial recognition), when we compare your "selfie" photo against your photographic ID;
- Data contained in your passport such as details of gender, date of birth, nationality, passport number and MRZ code;
- Data contained in your driver's licence such as name, address, date of birth and driving licence number;

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- The IP address of the device used by you in the Verification Process; and
- Additional information that you provide to us in order to conduct the Verification Process, to create Your Account and/or to allow us to discharge our legal obligations in our capacity as the Certificate Authority such as your name, email address, date of birth and mobile telephone number.

We may ask you to provide updated identity documentation to us if re-verification of your identity is required.

2. Processing by Fexco in connection with the operation of the GATS HelpDesk

Fexco will also act as an independent data controller in respect of your Personal Data in the following instances relating to its role as the operator of the GATS HelpDesk: processing of Customer Data that may be included in HelpDesk support requests or HelpDesk correspondence, including screen-recordings and recordings of phone calls, for the purpose of supporting Fexco's internal performance management and staff training, and also for service quality assurance purposes.

3. Aggregated Data

This Privacy Notice is not intended to place any limits on what we do with data that is aggregated and/or de-identified so that it is no longer associated with an identifiable user or Customer. We may disclose or use aggregate or de-identified information for any purpose. For example, we may share aggregated or de-identified information with AWG, our partners or others for business or research purposes.

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C. WHY WE NEED CUSTOMER DATA

Fexco needs Customer Data for the purposes identified above.

In the case of the Verification Process, Fexco processes Customer Data to comply with our legal obligations as a Certification Service Provider under the Irish Electronic Commerce Act 2000 (the "**E-Commerce Act**"). If you do not provide the required Customer Data, then we will be unable to proceed with the Verification Process or allow you to register for or use Your Account as requested. We will not collect any Personal Data from you that we do not need in order to conduct the Verification Process, or for which we require your consent but such consent has not been obtained.

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D. HOW WE USE YOUR INFORMATION

In the context of the Verification Process, Fexco is the Certificate Authority through which GATS digital certificates (in order to effect electronic execution of GATS instruments on GATs) are issued. We are legally obliged under applicable laws to take appropriate steps to verify the identity of persons to whom GATS Digital Certificates for use in electronic signatures are granted.

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In all instances, including in connection with the Verification Process, we will only process your Personal Data where we have a legal basis to do so. In general, our legal basis for processing your Personal Data will be:

(i) processing that is necessary for compliance with our legal obligations (see above) and/or in furtherance of our legitimate interests (for example, we need to be efficient about how we meet our legal obligations or we have a legitimate interest to monitor contacts to and from the HelpDesk in order to manage performance/staff training and to improve the quality of service delivered by Fexco);

(ii) processing that is necessary for the establishment, exercise or defence of legal claims; and/or

(iii) receipt of your explicit consent to the processing.

1. Customer Data

In connection with our legal obligations as the Certificate Authority referenced above, Fexco will take measures to: (a) conduct and improve the Verification Process; (b) implement the Digital Certificate Policy and Certification Practice Statement; (c) prevent or address service, security and technical issues or, at a Customer's request, deal with customer support matters insofar as same may be relevant to the discharge of our legal obligations and (d) ensure ongoing compliance with the above mentioned obligations. In addition, Fexco may access and use Customer Data as reasonably necessary to support Fexco's internal performance management and staff training, and also for service quality assurance purposes in its operation of the GATS HelpDesk.

2. Other information

We use other kinds of information in connection our role as Certificate Authority of GATS Digital Certificates and as operator of the GATS HelpDesk. Specifically:

- **To understand and improve the Verification Process and our HelpDesk services.** We may carry out research and analyse trends to better understand how you are interacting with the Verification Process and our HelpDesk to seek to improve same.
- **To communicate with you by:**
    - **Responding to your requests.** If you contact us with a problem or question in connection with matters relevant to our role as the Certificate Authority of GATS Digital Certificates or as operator of the GATS HelpDesk, we will use your information to respond.
    - **Sending electronic communications.** We may send you administrative electronic communications relating to matters relevant to our role as the Certificate Authority of GATS Digital Certificates or as operator of the GATS HelpDesk. We may also contact you to inform you about changes in our Verification Process, and to issue any important Verification Process related notices, such as security and fraud notices. These electronic communications are made in our legitimate interest in accordance with Data Protection Legislation.

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- **Protecting Customer Data.** We work hard to keep Customer Data secure and to prevent abuse and fraud, and may contact you in this respect as necessary.

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E. HOW LONG WE KEEP CUSTOMER DATA FOR

Fexco keeps Customer Data as specified below, after which time it will be destroyed/fully anonymised if it is no longer required for the lawful purposes for which it was obtained. The length of time for which we retain Customer Data depends on the purposes for which we collect and use it and/or as required to comply with applicable laws including but not limited to e-signature requirements.

Retention periods apply to Customer Data and a schedule has been compiled to ensure that Customer Data is not held for longer than necessary. We typically retain your Customer Data connected with the Verification process throughout the duration of Your Account and for at least thirteen years after the date of closure of Your Account, after which time it will be destroyed/fully anonymised if it is no longer required for the lawful purposes for which it was obtained.

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F. YOUR RIGHTS

As a data subject, you have the following rights under Data Protection Legislation and we, as controller in respect of Customer Data, will comply with such rights in respect of Customer Data:

- the right of access to Personal Data relating to you;
- the right to correct any mistakes in your Personal Data;
- the right to ask us to stop contacting you with direct marketing;
- rights in relation to automated decision taking;
- the right to restrict or prevent your Personal Data being processed;
- the right to have your Personal Data ported to another controller;
- the right to erasure; and
- the right to complain to the DPC or other relevant supervisory authority if you believe we have not handled your Personal Data in accordance with Data Protection Legislation.

These rights are explained in more detail in Schedule A to this Notice, but if you have any comments, concerns or complaints about our use of your Personal Data, please contact us (see 'How To Contact Us' below). We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex or cumbersome, in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond). Where a response is required

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from us within a particular time period pursuant to Data Protection Legislation, we will respond within that time period.

Withdrawal of consent

If you no longer consent to our processing of Customer Data (in respect of any matter referred to in this Privacy Notice as requiring your consent), you may request that we cease such processing by contacting us via the 'How To Contact Us' facility referred to below.

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G. SHARING AND DISCLOSURE

There are times when information described in this Privacy Notice may be shared by Fexco. This section discusses only how Fexco may share such information. We may share with third parties certain pieces of aggregated, non-personal information. Such information does not identify you individually. We restrict access to Customer Data to employees, contractors, and agents who need to know that information for the lawful purposes outlined in this Privacy Notice, including to operate, develop, or improve our Verification Process on the Website or the HelpDesk service. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination, civil litigation and/or criminal prosecution, if they fail to meet these obligations.

Where the requirements of Data Protection Legislation are met, Customer Data may be transferred to, stored at, or accessed from a destination outside the European Economic Area ("**EEA**"). It may also be processed by staff operating outside the EEA who work for us, our Affiliates, or any of our suppliers. We will take all steps reasonably necessary to ensure that Customer Data is treated securely and in accordance with Data Protection Legislation and this Privacy Notice. The safeguards in place with regard to the transfer of Customer Data outside of the EEA are reliance on adequacy decisions made by the European Commission as permitted by Article 45 GDPR such as adherence with Privacy Shield (USA) or approved safeguard measures pursuant to Article 46 GDPR such as the entry by us into appropriate standard contractual clauses with all transferees of such data.

In Particular:

1. Customer Data

Fexco may share Customer Data

With AWG. Any such sharing will be in connection with the operation of the GATS platform and Helpdesk insofar as relevant to the purposes for which we collect and process Customer Data as outlined in this Privacy Notice.

With third party service providers, our Affiliates and agents. We engage third party companies or individuals to process Customer Data as follows:

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- Our Identity Verification Service Provider (ID Pal) as part of the Verification Process. Further information in relation to the processing undertaken by ID Pal is available here: https://www.id-pal.com/privacy-policy/;
- Our HelpDesk support team in connection with customer support matters relating to the Verification Process;
- Other Companies in the Fexco Group;
- Companies that provide support services in connection with the purposes for which we collect and process Customer Data as outlined in this Privacy Notice. These include IT and telecommunication service providers, software development contractors, data processors, computer maintenance contractors, document storage and destruction companies, including legal advisors.
- Statutory and regulatory bodies and law enforcement authorities.

2. Other types of disclosure

Fexco may share or disclose Customer Data and other information as follows:

- **During changes to our business structure.** If we engage in a merger, acquisition, bankruptcy, dissolution, reorganisation, sale of some or all of Fexco' assets, financing, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence).
- **To comply with laws.** To comply with legal or regulatory requirements and to respond to lawful requests, court orders and legal process.
- **To enforce our rights, prevent fraud and for safety.** To protect and defend the rights, property, or safety of us or third parties, and/or to enforce our legal or contractual rights or relevant policies, including the Digital Certificate Policy and Certification Practice Statement.

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H. THIRD PARTY WEBSITES

This Privacy Notice applies to the processing activities set out above, including the Verification Process. We do not exercise control over the Website or the sites/applications that you may be directed to in the course of completing the Verification Process. These sites/applications may place their own cookies or other files on your computer, collect data or solicit personal information from you.

You acknowledge that your interactions with us in connection with the purposes outlined in this Privacy Notice may enable or assist you to access the website content of, correspond with, and purchase products and services from, third parties via third-party websites and that you do so solely at your own risk. We make no representation or commitment and shall have no liability or obligation whatsoever in relation to the content or use of, or correspondence with, any such third-party website, or any transactions completed, and any contract entered into by you, with any such third party and the use by any such third-party of your

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Personal Data. We do not endorse or approve any third-party website nor the content of any of the third-party websites made available to you via your interactions with us. We encourage you to carefully familiarize yourself with the terms of use and privacy policies applicable to any websites owned and/or services operated by third parties. Please be aware that we are not responsible for the privacy practices of any other parties.

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I. HOW DO WE PROTECT YOUR PERSONAL INFORMATION

We do our utmost to protect user privacy through the appropriate use of security technology. We restrict access to Customer Data to employees, contractors and agents who need to know such Customer Data in connection with the purposes referenced in this Privacy Notice. We ensure that we have appropriate physical and technological security measures to protect your information; and we ensure that when we outsource any processes that the service provider has appropriate security measures in place. However, certain aspects of your interactions with us may contain hyperlinks to websites owned and operated by third parties. These third party websites have their own privacy policies, including cookies. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

We will implement appropriate technical and organisational measures to ensure a level of security appropriate to the risks that are presented by the processing of Customer Data. In particular, we will consider the risks presented by accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Customer Data transmitted, stored or otherwise processed.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect Customer Data, we cannot guarantee the security of any data transmitted to us and any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. To the extent permitted by law, we are not responsible for any delays, delivery failures, or any other loss or damage resulting from (i) the transfer of data over communications networks and facilities, including the internet, or (ii) any delay or delivery failure on the part of any other service provider not contracted by us, and you acknowledge that your registration and use of Your Account may be subject to limitations, delays and other problems inherent in the use of such communications facilities. You will appreciate that we cannot guarantee the absolute prevention of cyber-attacks such as hacking, spyware and viruses. Accordingly, you will not hold us liable for any unauthorized disclosure, loss or destruction of Customer Data arising from such risks.

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J. BREACH REPORTING

We will notify serious data breaches in respect of Customer Data to the DPC or to the relevant supervisory authority without undue delay, and where feasible, not later than 72 hours after having become aware of same. If notification is not made after 72 hours, we will record a reasoned justification for the delay; however,

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it is not necessary to notify the DPC or the relevant supervisory authority where the Personal Data breach is unlikely to result in a risk to the rights and freedoms of natural persons. A Personal Data breach in this context means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

We will keep a record of any data breaches, including their effects and the remedial action taken, and will notify you of any data breach affecting your Personal Data (which poses a high risk to you) when we are required to do so under Data Protection Legislation. We will not be required to notify you of a data breach where:

- we have implemented appropriate technical and organisational measures that render the Personal Data unintelligible to anyone not authorised to access it, such as encryption; or
- we have taken subsequent measures which ensure that the high risk to data subjects is not likely to materialise; or
- it would involve disproportionate effort, in which case we may make a public communication instead.

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K. CHILDREN'S INFORMATION

The Services on the Website are not directed to children under 16. If you learn that a child under 16 has provided us with personal information without consent, please contact us.

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L. CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice from time to time, and if we do we will post any changes on this page. If you continue to interact with us after those changes are in effect, you agree to the revised Privacy Notice.

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M. HOW TO CONTACT US

If you have any questions about this Privacy Notice, your information, our use of this information, or your rights when it comes to Customer Data, please feel free to contact us by emailing dataprotection@fexco.com or by writing to us at Fexco UC, Data Protection Team, FEXCO Centre, Iveragh Road, Killorglin, Co. Kerry, Ireland.

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Schedule A - Data Subject rights under Data Protection Legislation

Right of access to Personal Data relating to you

You may ask to see what Personal Data we hold about you and be provided with:

- a summary of such Personal Data and the categories of Personal Data held (see Sections 1 and 2 above);
- details of the purpose for which it is being or is to be processed;
- details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those oversea transfers;
- details of the period for which it is held or the criteria we use to determine how long it is held;
- details of your rights, including the rights to rectification, erasure, restriction or objection to the processing;
- any information available about the source of that data;
- whether we carry out automated decision-making, or profiling, and where we do, information about the logic involved and the envisaged outcome or consequences of that decision making or profiling; and
- where your Personal Data are transferred out of the EEA, what safeguards are in place.

Requests for your Personal Data must be made to us (see 'How To Contact Us') specifying what Personal Data you need access to, and a copy of such request may be kept by us for our legitimate purposes. To help us find the information easily, please give us as much information as possible about the type of information you would like to see. If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person, if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person, if possible.

There are certain types of data which we are not obliged to disclose to you, which include Personal Data which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations. We are also entitled to refuse a data access request from you where (i) such request is manifestly unfounded or excessive, in particular because of its repetitive character (in this case, if we decide to provide you with the Personal Data requested, we may charge you a reasonable fee to account for administrative costs of doing so), or (ii) we are entitled to do so pursuant to Data Protection Legislation.

Right to update your Personal Data or correct any mistakes in your Personal Data

You can require us to correct any mistakes in your Personal Data which we hold free of charge. If you would like to do this, please:

- email or write to us (see ‘How can you contact us’);

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- let us have enough information to identify you (e.g. name, registration details); and
- let us know the information that is incorrect and what it should be replaced with.

If we are required to update your Personal Data, we will inform recipients to whom that Personal Data have been disclosed (if any), unless this proves impossible or has a disproportionate effort.

It is your responsibility that all of the Personal Data provided to us is accurate and complete. If any information you have given us changes, please let us know as soon as possible (see 'How To Contact Us').

Rights in relation to automated decision taking (if applicable)

You may ask us to ensure that, if we are evaluating you, we don't base any decisions solely on an automated process and have any decision reviewed by a member of staff. These rights will not apply in all circumstances, for example where the decision is (i) authorised or required by law, (ii) necessary for the performance of a contract between you and us, or (ii) is based on your explicit consent. In all cases, we will endeavour that steps have been taken to safeguard your interests.

Right to restrict or prevent processing of Personal Data

In accordance with Data Processing Legislation, you may request that we stop processing your Personal Data temporarily if:

- you do not think that your Personal Data is accurate (but we will start processing again once we have checked and confirmed that it is accurate);
- the processing is unlawful but you do not want us to erase your Personal Data;
- we no longer need the Personal Data for our processing, but you need the Personal Data to establish, exercise or defend legal claims; or
- you have objected to processing because you believe that your interests should override the basis upon which we process your Personal Data.

If you exercise your right to restrict us from processing your Personal Data, we will continue to process the Personal Data if:

- you consent to such processing;
- the processing is necessary for the exercise or defence of legal claims;
- the processing is necessary for the protection of the rights of other individuals or legal persons; or
- the processing is necessary for public interest reasons.

Right to data portability

In accordance with Data Protection Legislation, you may ask for an electronic copy of your Personal Data that you have provided to us and which we hold electronically, or for us to provide this directly to another party.

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This right only applies to Personal Data that you have provided to us – it does not extend to data generated by us. In addition, the right to data portability also only applies where:

- the processing is based on your consent or for the performance of a contract; and
- the processing is carried out by automated means.

Right to erasure

In accordance with Data Protection Legislation, you can ask us (please see 'How To Contact Us') to erase your Personal Data where:

- you do not believe that we need your Personal Data in order to process it for the purposes set out in this Privacy Notice;
- if you had given us consent to process your Personal Data, you withdraw that consent and we cannot otherwise legally process your Personal Data;
- you object to our processing and we do not have any legal basis for continuing to process your Personal Data;
- your Personal Data has been processed unlawfully or have not been erased when it should have been; or
- the Personal Data have to be erased to comply with law.

We may continue to process your Personal Data in certain circumstances in accordance with Data Protection Legislation (i.e. where we have a legal justification to continue to hold such Personal Data). Where you have requested the erasure of your Personal Data, we will inform recipients to whom that Personal Data have been disclosed, unless this proves impossible or involves disproportionate effort. We will also inform you about those recipients if you request it.

Right to complain to the DPC or to the relevant supervisory authority

If you do not think that we have processed your Personal Data in accordance with this Privacy Notice, please contact us in the first instance. If you are not satisfied, you can complain to the DPC/the relevant supervisory authority or exercise any of your other rights pursuant to Data Protection Legislation. Information about how to do this is available on the DPC website at https://www.dataprotection.ie

To your rights

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