



FW Aviation (Support Services) Limited

Privacy Policy

Introduction

Introduction and who we are

We are FW Aviation (Support Services) Limited, a limited company registered in Ireland with registration number 12400257, whose registered address is at FW Aviation (Support Services) Limited, Unit J, Block 1, Shannon Business Park, Shannon, Co Clare, Ireland 706140. The pages on this website are published on behalf of FW Aviation (Support Services) Limited.

FW Aviation (Support Services) Limited ("**FW Aviation**" or "**we**") respect your right to privacy and will process personal information you provide only in accordance with applicable data protection and privacy laws.

This privacy policy sets out how FW Aviation processes the personal information of our website visitors and individuals who we communicate or interact with in the course of our business.

If you have any questions about this privacy policy or any other privacy policies mentioned above please contact us in writing for the attention of at or by email to simon.siganto@fwcas.com.¹

How we collect personal information²

When you visit FW Aviation's website, we collect some basic information such as your browser type, IP address, internet service provider's domain name, which pages you accessed on the site, and when. Details of cookies used on the website can be found on the Cookie notice.

FW Aviation uses this information to provide you with and maintain the quality of the website and to analyse use of the website in order to help guide improvements.

We will also collect and store your personal information when you contact or communicate with FW Aviation in the course of business, through our Send a Message feature, or via any of the other means of contact listed on our website.

We may also receive information from third parties who collect personal information from you and pass it on to us for example where we conduct verification or anti-money laundering checks for prospective transactions or in the course of onboarding new clients.³

What personal information do we process about you⁴

Personal information means any information relating to a person that identifies a person or enables them to be identified either directly or indirectly. Personal information that we process about you may include your name, email address and phone number, as well as any personal information that you communicate to us via the Send a Message feature or otherwise.

If you are a business contact, personal information we will process about you may also include your job title, employer organisation and anti-money laundering checks information (such as identification (e.g. passport and/or drivers' license)).

We will take reasonable steps to keep the personal information that we process accurate. If you consider that any of the personal information that FW Aviation processes about you is incorrect please notify us.

How we use your information

We will use your personal information, and may share your personal information with other parties acting on our behalf,

for one or more of the following purposes and according to the specified legal bases:⁵

Purpose(s) for Processing	Legal Basis
To conduct research about the use of our website.	<ul style="list-style-type: none"> • In pursuit of our legitimate interests in managing our business (except where your interests or fundamental rights override these).
Fulfilling requests or replying to enquiries you make.	<ul style="list-style-type: none"> • In pursuit of our legitimate interests in managing our business (except where your interests or fundamental rights override these). • On the basis of your consent.
To assess and respond to a complaint you might make to us.	<ul style="list-style-type: none"> • In pursuit of our legitimate interests in managing our business (except where your interests or fundamental rights override these). • On the basis of your consent.
To manage our relationship with your business and provide your business with our services.	<ul style="list-style-type: none"> • In pursuit of our legitimate interests in managing our business (except where your interests or fundamental rights override these).
For our own administrative purposes, including training our staff, conducting internal audits or transferring assets as part of a sale, purchase or investment in our business.	<ul style="list-style-type: none"> • In pursuit of our legitimate interests in managing our business (except where your interests or fundamental rights override these).
To perform anti-money laundering and verification checks in the course of onboarding a business you are engaged with as our client.	<ul style="list-style-type: none"> • To comply with legal obligations to which we are subject.
To conduct investigations of suspicious or harmful activity or to protect against, identify and prevent fraud and other unlawful activity.	<ul style="list-style-type: none"> • To comply with legal obligations to which we are subject. • In pursuit of our legitimate interests in managing our business (except where your interests or fundamental rights override these).

We do not sell your personal information to others. If we wish to use your personal information for a purpose beyond that for which it was originally provided and the further purpose is not compatible with the original purpose (and we have collected your personal information on the basis of pursuing our legitimate interests), we will only process your personal information for that purpose if we can identify a valid legal basis on which to process your personal information in accordance with applicable law.

Third-party recipients of information

There are circumstances where we may wish to disclose or are compelled to disclose your personal information to

third parties. This will only take place in accordance with the applicable law and for the purposes listed above. These third parties include:

- our group entities;
- our outsourced service providers or suppliers to facilitate the provision of our services;
- our outsourced third party service providers who process personal information on our behalf such as providers of cloud hosting solutions, website hosts or providers of data storage or security;
- another legal entity, on a temporary or permanent basis, for the purposes of (or in contemplation of) a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your personal information will be permanently transferred to a successor entity;
- professional advisors such as lawyers and accountants, fund administrators or other consultants;
- public authorities where we are required by law to do so; and
- any other third party where you have provided your consent.

International transfers

FW Aviation may transfer personal information that is collected from you to third-party data processors located in countries that are outside of the European Economic Area (“**EEA**”) in connection with the above purposes. Please be aware that countries which are outside the EEA may not offer the same level of data protection as within the EEA. In these circumstances we will, as required by applicable law, ensure that your personal information is subject to an essentially equivalent level of protection by appropriate technical, organisational, contractual or other lawful means. Please contact us if you would like more information about how your personal information may be transferred by FW Aviation and the safeguards that we have put in place.

Retention of personal information⁶

We will take all reasonable steps to retain personal information only for the duration of the purpose for which it was obtained as set out in this privacy policy (unless longer retention is required by applicable law or regulation). We may keep an anonymised form of your personal information, from which you will no longer be identifiable, for statistical purposes without time limits.

Security

FW Aviation seeks to safeguard all personal information that you provide to us, to ensure that it remains confidential and secure and to take all reasonable steps to ensure that personal privacy is respected.

Whilst FW Aviation takes appropriate technical and organisational measures to safeguard the personal information that you provide, no transmission over the internet can ever be guaranteed secure. Consequently, please note that the security of any personal information that you transfer over the internet to FW Aviation cannot be guaranteed.

All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards designed to protect your personal information from misuse, unauthorised access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, joint venture partners, group entities and third parties who need to know that information for the purposes set out in this privacy policy.

Your rights

Data protection law provides individuals with certain rights, including the right to: access, rectify, withdraw consent, erase, restrict, port, and object to the processing of, their personal information. Individuals also have the right to lodge a complaint with the relevant data protection authority if they believe that their personal information is not being processed in accordance with the law. Further information about your rights is set out below. You have:

- the right to be provided with copies of personal information that FW Aviation hold about you, free of charge;
- the right to ask FW Aviation to update and correct any out-of-date or incorrect personal information held about you, free of charge;
- the right to withdraw consent, as permitted by law, to the processing of your personal information (which we are processing on the basis of your consent) at any time. Such withdrawal will not affect the lawfulness of processing based on your consent up until the point of withdrawal or processing which is validly based on another legal basis. Please note that if you withdraw your consent, you may not be able to benefit from certain service features for which the processing of your personal information is essential;
- the right to object to processing and to request that we stop processing your personal information, as permitted by law;
- the right to request that we erase your personal information, with which we will comply, unless there is a lawful reason for not doing so; and
- the right to lodge a complaint with the supervisory authority.

We suggest that you contact us about any questions or if you have a complaint in relation to how we process your personal information. However, you do have the right to contact the relevant supervisory authority, which in Ireland is the Data Protection Commission.

If you wish to exercise any of the above rights, please contact FW Aviation via the contact details specified above.

We do not use personal information for any automated decision-making or profiling purposes.

Third-party sites

The website may contain links to other websites operated by third parties. Please note that this privacy policy applies only to the personal information FW Aviation collect and FW Aviation cannot be responsible for personal information that third parties may collect, store and use through their website. You should always read carefully the privacy policy of each website you visit.

Changes to this policy

As we strive to improve our practices, we may review this policy from time to time. We reserve the right to change this policy at any time and to notify you of those changes by posting an updated version of this policy on our website. It is your responsibility to check our policy each time before you access our website for any changes.