

## **PRIVACY & COOKIE POLICY**

**AZURE AERO Limited** (hereafter “AAL”) respects your privacy and is committed to protecting your personal data and confidential information.

This privacy policy will inform you as to how we look after your personal data when you visit our website or do any business-related transactions with us. It also tells you about your privacy rights and how the law protects you.

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### **1 IMPORTANT INFORMATION AND WHO WE ARE**

#### **Purpose of this privacy policy**

This privacy policy aims to give you information on how AAL collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a service or product.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

#### **Data Controller**

AAL (collectively referred to as “AAL”, “we”, “us” or “our” in this privacy policy) is a data controller for the purposes of the Data Protection Act 2018 and the GDPR (General Data Protection Regulations) together with any regulations made under them (Manx Data Protection Legislation) and is responsible for your personal data.

**Contact details**

Our full details are:

Name of legal entity: Azure Aero Limited  
Company registration number: 014099V  
Registered office: Portway,  
Balthane Industrial Estate,  
Ballasalla,  
Isle of Man,  
IM92AJ

Postal address of venue: Portway,  
Balthane Industrial Estate,  
Ballasalla,  
Isle of Man,  
IM9 2AJ

Email address: info@azureaero.com

You have the right to make a complaint at any time to the Isle of Man Information Commissioner at 1st Floor, Prospect House, Prospect Hill, Douglas, IM1 1ET (<https://www.inforights.im>). The Information Commissioner is the independent authority responsible for upholding the public's information rights and promoting and enforcing compliance with the Island's information rights legislation. You have the right to request the Information Commissioner to undertake an assessment as to whether the processing of your personal data has been carried out in accordance with the provisions of the Manx Data Protection Legislation. *We would, however, appreciate the chance to deal with your concerns before you approach the Information Commissioner so please contact us in the first instance.*

**Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

**Third-party links**

This website 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 data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, last name, username or similar identifier.
- Personal details (e.g. name, date of birth, passport information or other identification information)
- Contact Data includes email address and telephone numbers.
- Financial Data includes payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- Information from credit reference agencies and fraud prevention agencies
- Organisations that provide their own data, or data from other third parties, to enable us to enhance the personal data we hold, and then provide more relevant and interesting products and services to you
- Criminal record checks and information
- Publicly available sources which are available online or otherwise, such as media stories
- Trading entities you own or are otherwise associated with (for example special purpose vehicles, trusts or partnerships) and the directors, partners, trustees or signatories of such entities.

Some of the information that AAL collects are special categories of personal data (also known as sensitive personal data). For example, the client due diligence checks AAL carries out may reveal political opinions or information about criminal convictions or offences. If you do not provide personal data that we advise you is mandatory, it may mean that we are unable to provide you with the services and/or perform all our obligations under our agreement with you.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We must have a legal basis to process your personal data. In most cases, the legal basis will be one of the following:

- To allow us to take actions that are necessary in order to provide you with the product / service (performance of a contract), for example, to make and receive payments
- To allow us to comply with our legal obligations, for example, obtaining proof of identity to enable us to meet our anti-money laundering obligations
- To meet our legitimate interests, for example, to understand how clients use our services and to develop new services, as well as improve the service we currently provide
- Where we have your consent to do so.
- In the case of special categories of personal data, that it is in the substantial public interest.

If you fail to provide personal data

- Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including:

#### **Direct interactions**

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- (a) Apply for our services;
- (b) Subscribe to our newsletter;
- (c) Send us any correspondence;
- (d) Request marketing to be sent to you;
- (e) Give AAL feedback.

#### **Automated technologies or interactions**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

#### **Third parties or publicly available sources**

We may receive personal data about you from various third parties and public sources as set out below.

**Technical Data from the following parties:**

- (a) Analytics providers such as Google and Facebook based outside the EU;
- (b) Advertising networks such as LinkedIn and Twitter based inside and outside the EU.
- (c) Contact, Financial and Transaction Data from providers of technical or payment services such as Stripe based outside the EU.

For a full list of our third party and services please check the glossary.

**4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message and any direct marketing from us. You have the right to withdraw consent to marketing at any time by contacting us.

**Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

## Table

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

You will only receive marketing communications with us if you have specifically opted into our newsletter.

### **Third-party marketing**

We will never share your personal data with any third party marketers.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase or other transaction.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

- (a) External Third Parties as set out in the Glossary.
- (b) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.
- (c) Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. COOKIES**

We collect data about how you interact with our Digital Applications through the use of cookies and other similar technology.

### **What is a cookie?**

Cookies are small text files containing small amounts of information which are downloaded to your computer or mobile device when you access our Digital Applications. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### **Why do we use cookies?**

Cookies are useful because they allow our Digital Applications to recognise your device. We use them to make our Digital Applications work, or work more efficiently, as well as to store information about your preferences or past actions. You can find out more information about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org). We also use cookies to enhance and improve your online experience (for example, by remembering your language and/or preferences) and to understand better how our Digital Applications are used. Cookies may tell us, for example, whether you have visited our Digital Applications before or whether you are a new visitor. They can also help to ensure that adverts seen online are more relevant to you and your interests. They cannot be used to identify you personally.

### **What types of cookies do we use and how?**

We use the following types of cookies:

- 'session cookies': these are allocated to your device only for the duration of your visit to our Digital Applications – they are deleted automatically once you close your browser; and
- 'permanent cookies': these survive after your browser is closed and can remain on your device for a period of time – they can be used by our Digital Applications to recognise your computer or mobile device when you open your browser and browse the internet again.

These cookies may be served directly by us to your computer or mobile device (so-called 'first-party cookies') or by one of our service providers (so-called 'third-party cookies'). A first-party cookie is only used by us to recognise your computer or mobile device when you revisit, or access content via, our Digital Applications. Third-party cookies can be used to recognise your computer or mobile device across different websites (and are most often used for analytical and advertising purposes).

### **What purposes do we use cookies for?**

We use cookies for the purposes stated below:

- essential cookies: these are essential to provide you with services available through our Digital Applications and to use some of their features, such as access to secure areas – without these, providing core functionality, such as transactional pages and secure login accounts, would not be possible;

- analytics cookies:** these are used to collect information about how you and others use our Digital Applications – the information gathered does not identify you and is aggregated – this includes the number of visitors to our Digital Applications, the websites or other applications that referred them to our Digital Applications and the pages that they visited on our Digital Applications – we use this information to help operate our Digital Applications more efficiently, to gather broad demographic information and to monitor the level of activity on our Digital Applications; **functionality cookies:** these allow our Digital Applications to remember choices you make (such as your user name or the region you are in) and provide enhanced, more personal features – they can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize – they may also be used to provide services you have asked for, such as watching a video or commenting on a blog – the information these cookies collect may be anonymised and they cannot track your browsing activity on other websites;
- performance cookies:** these collect information about how you and others use our Digital Applications, for example, which pages are most visited, if error messages come up and how effective our online promotions are – they are only used to help us improve how our Digital Applications work and to ensure ease and speed of use;
- marketing cookies:** these facilitate online advertising – our Digital Applications, for instance, use remarketing with Google – third-party vendors, including Google, use these cookies to tailor adverts based on someone’s past visits to our Digital Applications and serve these across the web – you can set preferences for how Google advertises to you using the Google Ads Settings; and
- social media cookies:** these are used when you share information using a social media sharing button or “like” button on our Digital Applications or you link your account or engage with our content on or through a social networking site such as Facebook, Instagram, Twitter or Google+ – the social network will then record that you have done this and the information may be linked to advertising activities such as targeted banners.

### **How to manage cookies?**

You have the right to choose whether or not to accept cookies. However, if you do not accept our cookies, you may not be able to use the full functionality of our Digital Applications. You can find more information about how to manage and remove cookies at [allaboutcookies.org/manage-cookies/](http://allaboutcookies.org/manage-cookies/) or by visiting the websites relevant to the browser you are using.

### **Cookies that we use:**

- First-party cookies
- Third-party cookies
- Session cookies



## **7. INTERNATIONAL TRANSFERS**

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

The country shall have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **8. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. DATA RETENTION**

### **How long will you use my personal data for?**

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [Request erasure] below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **10. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data (commonly known as a “data subject access request”
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us on email: [info@azureaero.com](mailto:info@azureaero.com)

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **11. GLOSSARY**

### **Lawful Basis**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Third Parties and Services and External Third Parties include**

- Service providers acting as processors based in the Isle of Man, United Kingdom, Ireland and the USA who provide customer support and communication services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the Isle of Man, United Kingdom who provide legal, banking, insurance and accounting services.
- IOM Customs & Excise, HM Revenue & Customs, regulators and other authorities based in the Isle of Man and United Kingdom.

**Our third party services are:**

- Refinitiv
- Google Analytics
- Microsoft Office Systems