

PremiAero Limited Privacy and Data Protection Policy

Introduction

PremiAero Limited (“PremiAero”) is a private company registered in the Bailiwick of Jersey, having its principal place of business at 2nd Floor, The Le Gallais Building, 54 Bath Street, St Helier, JE1 1FW.

PremiAero is involved in trading, asset management, lease, and consultancy services in the aviation industry (the “Services”).

PremiAero acknowledges and value your right to privacy and takes seriously its responsibilities in relation to the processing of personal data. It does not collect, store or process personal data unnecessarily.

In order to conduct its business PremiAero has to gather and retain certain information about those persons with whom it transacts. Its privacy and data protection policy (the ‘Policy’) is written in accordance with the requirements of the Data Protection (Jersey) Law 2018. The Policy explains how personal data that we collect from you, or that you provide to us is being processed and treated.

Situations when PremiAero collects information.

The information you provide to us

PremiAero will collect and process the following data about you.

Your Data: This is information about you that you provide by corresponding with PremiAero by phone, e-mail or by filling in forms on our website or otherwise.

The information you give us may include:

- Identity Data: your full name, address, e-mail address, phone number, title and personal description.
- AML Compliance Data: your Identity Data, passport number and details (including photograph) and proof of address.
- Financial Data: your financial, including bank account details, billing contact email address and VAT number.

The information we collect in relation to the website use

Automatically collected Information as a result of using our website or files storage software. The following information may be collected automatically:

- Technical Data: technical information, including the Internet protocol (IP) login information, browser information, time zone, statistics of using the application or data upload.
- Usage Data: information about your visit, including URL, time on the website, pages viewed, response times, etc.

We do not require or collect any personal data unless you decide to provide this information to us.

How PremiAero uses information about you and the legal basis for that use

Purpose/Activity	Type of data	Legal basis for processing
As a result of Services, we provide including but not limited to sale, purchase, lease, inspection of the Aircraft or Engine, we need to be able to assist your requests and provide you with the information required.	<ul style="list-style-type: none"> - Identity Data - AML Compliance Data - Technical Data - Usage Data 	<ul style="list-style-type: none"> - Contract obligations - Compliance with a legal requirement
To manage payments, fees and charges, to complete business transactions, and to collect and recover money owed to us.	<ul style="list-style-type: none"> - Identity Data - AML Compliance Data - Financial data 	<ul style="list-style-type: none"> - Contract obligations - Necessary for credit check - Compliance with a legal requirement

<p>To maintain our relationship with customers.</p>	<ul style="list-style-type: none"> - Identity Data - Technical Data - Usage Data 	<ul style="list-style-type: none"> - Contract obligations - Necessary for credit check - Compliance with a legal requirement <p>Necessary for our business:</p> <ul style="list-style-type: none"> - keeping in contact with existing customers and developing relationship with new customers in order to grow - keep our records updated and to analyse the market and to utilize our services in the best way)
<p>To provide you with information about services we offer that are similar to those that you have enquired about.</p>	<ul style="list-style-type: none"> - Identity Data - Technical Data - Usage Data 	<p>Necessary for our legitimate interests (to develop our products or Services and grow our business)</p>
<p>Where you have given us your consent to do so, to provide you with information about other services we feel may interest you.</p>	<ul style="list-style-type: none"> - Identity Data - Technical Data - Usage Data 	<p>Consent</p>
<p>To ensure that content is presented in the most effective manner for you and for your computer or device.</p>	<ul style="list-style-type: none"> - Identity Data - Technical Data - Usage Data 	<p>Necessary for our legitimate interests (to keep our Site and the Services updated and relevant and to develop and grow our business).</p>
<p>To administer and protect our business, our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.</p>	<ul style="list-style-type: none"> - Identity Data - Technical Data - Usage Data 	<p>Necessary for our legitimate interests (for running our business and as part of our efforts to keep our Site and the Services safe and secure)</p>
<p>To use data analytics to improve or optimise our</p>	<ul style="list-style-type: none"> - Technical Data - Usage Data 	<p>Necessary for our legitimate interests (to define types of</p>

Site, marketing, customer relationships and experiences.		customers for our products and services, to keep our Site and the Services updated and relevant, to develop and grow our business and inform our marketing strategy).
To measure or understand the effectiveness of advertising we serve to you and others, and, where applicable, to deliver relevant advertising to you.	<ul style="list-style-type: none"> - Identify Data - Technical Data - Usage Data 	Necessary for our legitimate interests (to study how customers use our products or Services, to develop them, to grow our business and to inform our marketing strategy).

Young Persons

We do not knowingly attempt to process or store any information from children.

Length of time information is held

PremiAero will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected including for the purposes of satisfying any legal, accounting, or reporting requirements. This means that the period of time for which we store your personal data may depend on the type of data we hold. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

How PremiAero keeps your information secure

PremiAero uses modern storage and security techniques to protect your personal information from unauthorised access, improper use or disclosure, unauthorised modification or accidental loss. Only authorised members of staff have access to online records. These records are password protected.

Despite all of our precautions however, no data transmission over the internet can be guaranteed to be 100% secure. So, whilst we strive to protect your personal information, we cannot guarantee the security of any information which you disclose to us and so wish to draw your attention that you do so at your own risk.

Whilst we hope it will never happen, we have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are required to do so.

It may be necessary to send your personal data to third parties outside the EEA as part of a transaction, where the privacy and data protection laws may not be as protective as those in your jurisdiction. For example, passport information may be sent in order to obtain airport passes necessary for engine or aircraft inspection. Such data would not

be sent without your express consent and knowledge as to the recipient. In these sorts of cases PremiAero will seek assurances that the third party will respect the security of your personal data and treat it in accordance with all applicable laws.

Disclosure of your Information

We do not sell your personal information to third parties for marketing purposes. We may disclose information to third parties if you consent to us doing so as well as in the following circumstances:

You agree that we have the right to share your personal information with the following recipients or categories of recipients:

- Any department or authorised person within our company.
- Selected third parties including:
 - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you in relation to the Services;
 - government agencies, authorities or departments for the purposes of complying with any travel, transportation or security requirements in relation to the Services;
 - banking and other financial institutions in relation to the leasing or supply of any particular aircraft under or as part of the Services;
 - credit reference agencies for the purpose of assessing your credit score to the extent this is a condition of us entering into a contract with you.

We will disclose your personal information to third party recipients:

- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of our business or assets.
- if PremiAero or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- if we are under a duty to disclose or share your personal data in order to comply with any law, legal obligation or court order, or in order to enforce rights under the GDPR or other agreements.
- to protect our rights, property or safety, our customers, or others. This includes exchanging information with other companies and organisations for the maintenance and security of the Site and Services.

Your rights

Under the applicable data protection laws you have various rights over your personal information: You have the right to:

- Request access to your personal data, commonly known as a 'subject access request' or "SAR". This enables you to receive a copy of the personal data we hold about you. Please be aware that in order to process SARs we will require proof of your identification.
- Request that we correct the personal data we hold about you. This enables you to have an incomplete or inaccurate data we hold about you corrected, although note that we may need to verify the accuracy of the new data you provide to us.
- Ask us to erase your personal data in certain circumstances. Please note however that there may be circumstances where you ask us to erase your personal data but we are legally required or entitled to retain it.
- Where we are processing your data under the legitimate interest condition, then you may object to this processing, or request that the processing is restricted, if there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. Note that there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally required or entitled to continue to processing your personal data and/or to refuse your request. In some cases, we may demonstrate that we have a compelling legitimate ground to process your information which override your rights and freedoms.
- Where we have asked you for consent to process your data, you may withdraw this consent at any time by contacting office@premiaero.co.uk
- Please note however that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.

Changes to this policy

Any changes made to this Policy from time to time will be published at the Site.

Any material or other change to the data processing operations described in this Policy which is relevant to or impacts on you or your personal data, will be notified to you in advance by email. In this way, you will have an opportunity to consider the nature and impact of the change and exercise your rights under the GDPR in relation to that change (e.g., to withdraw consent or to object to the processing) as you see fit.

This Privacy policy was last updated on 18 November 2018

Questions or concerns

If you have any questions relating to this policy or data protection within please contact office@premiaero.co.uk We will do what we can to resolve any problem or query.

If you would like to make a complaint to the [Information Commissioner](#), or learn more about data protection in Jersey please visit their website at www.dataci.je. The Commissioner is an independent statutory authority, with a mission to promote respect for the private lives of individuals through ensuring privacy of your personal information. Please bear in mind that the [Office of the Information Commissioner](#) (OIC) as referred to in this Policy and on our website is that in the Bailiwick of Jersey and not the United Kingdom.

