

**AMAC PRIVACY AND DATA PROTECTION NOTICE**

AMAC privacy notice describes how AMAC Aerospace Switzerland AG, registered at Sternengasse 18, CH-4051 Basel Switzerland and all AMAC affiliates representing AMAC Group of Companies consisting of AMAC Corporate Jet AG, Zürich in Switzerland; AMAC Aerospace TURKEY A.Ş., Bodrum and Istanbul in Turkey; Gamit Ltd., London in the United Kingdom; JCB Aero, Auch in France; AMAC Aerospace Beirut, Beirut in Lebanon; AMAC Aerospace Riyadh Ltd., Riyadh in Saudi Arabia (all "AMAC") collects and processes personal information through the various AMAC websites\* and any other AMAC related applications that link to AMAC Services ("Services"). This Privacy notice also including the usage and protection of the personal information and the individual personal rights.

AMAC privacy notice applies to all personal information that AMAC collect or process in order to identify the person linked to this information. Such information is represented in different forms, in a combination, in pieces or in fragments of information.

\*AMAC Websites:

- [www.amacearospace.com](http://www.amacearospace.com),
- [www.gamit.co.uk](http://www.gamit.co.uk),
- [www.roam.aero](http://www.roam.aero),
- [www.jcbaero.com](http://www.jcbaero.com).

**1. COLLECTION OF PERSONAL INFORMATION**

AMAC collect data and personal information from different sources. AMAC may also be required by law or through AMAC contractual relationship to collect certain personal information.

**Directly collected Information**, e.g. being in contact AMAC, inquire about AMAC services, meet at AMAC event, sign up for AMAC newsletter or AMAC social media channels:

- personal details (e.g. name, CV, date of birth, passport, and ID card details);
- contact details (e.g. business card, business address, phone number, email address, postal address or mobile number, professional details);
- account/subscription details (e.g. e-mail address, username and password);
- transaction details (e.g. purchases, offers or information AMAC collect about the usage of Services);

- communications (e.g. being part of message broadcasts or forums, participate in surveys, write, read and comments questions).

**Information generated out of the relationship** with AMAC, e.g. data collected from cookies and other similar technologies as informed in the AMAC Cookies Notice (<https://www.amacaerospace.com/cookie-policy>):

- Information about your usage of AMAC Websites, including technical information collected from your computer or mobile device (e.g. geolocation and IP address, time& location, browser type, operating system);
- Information which AMAC generate as a result of your use of the Services and collect from other sources.

**Information collected from other sources**, including free available sources in the internet and public databases (where permitted by law), e.g. personal and contact details with the content as outlined in prior paragraph.

The personal information owner has choices about the information AMAC collect. When being asked to provide information, the owner of such personal information may decline to do so; but if the choice is not to supply information that is necessary to provide AMAC Services, it would be difficult to use those Services. In addition, it is possible to change the browser settings to block the automatic collection of certain information. Deactivation of location services and information on mobile device or deny or remove of such permission is possible at any time. Please consult with the corresponding device manufacturer or refer to the operating system instructions for further instructions. Please also consult with the AMAC Cookies Notice for Cookies, Web Tracking, and Advertising information details and how to control and/or opt out of certain web tracking technologies.

It is always possible to **opt out** from receiving AMAC marketing material or other communications at any time through your direct relationship manager, any other communications channels, e.g. e-mail, telephone or by contacting AMAC Data Protection Officer ("DPO") by sending an email to [dpo\\_@amacaerospace.com](mailto:dpo_@amacaerospace.com). In such e-mail please include "Opt Out" in the email's subject line and include in the body of the email your name and the

email address and telephone number you used to sign up for communications.

Note that if there is an existing or envisaged business relationship with AMAC it is not possible, subject to applicable law, to opt out of certain automated notifications, e.g. business transactions and contract notifications.

## 2. USAGE OF PERSONAL INFORMATION

AMAC may use the received personal information for various purpose and may create different data formats out of the personal information received in order to enhance security over this data, such as:

- anonymize or pseudomize personal information in such a way that it may not reasonably be re-identified by AMAC or any other company. This will create more security around the usage and storage of personal information;
- encrypt personal information in such a way that only the holder of encryption key can make the encrypted data human readable. The level of encryption will be decided by AMAC depending on sensitiveness of personal information. This will create an additional security layer to personal information.

The various purposes for personal information usage are listed hereafter:

**Identification and authentication:** AMAC use identification information to verify the identity when accessing AMAC Services in order to comply with established contractual obligations and ensure security of personal information.

**Operating the AMAC Services:** AMAC process personal information to provide the requested Services in alignment to agreed contracts.

**Marketing:** AMAC may profiling personal information from various to increase marketing features, but as per the date of this privacy notice AMAC is not pursuing any profiling of personal information.

**Improving AMAC Services:** AMAC analyze information about the usage of AMAC Services in order to provide an improved Service to AMAC customers. This can improve also the customization and service offers of AMAC Services.

**Communication:** AMAC may use personal information within approved communication

channels, especially when answering questions or informing about changes of terms and conditions.

**Exercising AMAC rights:** AMAC may use personal information to comply with AMAC legal rights when necessary, e.g. prevent and respond to fraud claims or violations of law like intellectual property.

**Compliance with AMAC obligations:** AMAC may process personal information to fulfill compliance obligation required by law and/or regulations, e.g. carry out fraud prevention checks.

## 3. SHARING OF PERSONAL INFORMATION

Personal information may be shared by AMAC with third parties in different circumstances.

**Group companies:** AMAC is a family owned business with subsidiaries in Switzerland, Turkey, France, United Kingdom, Lebanon and Saudi Arabia. All these companies form AMAC Group of Companies. AMAC may share certain personal information within the group for marketing purposes, security, optimization of products and services, legal requirements, business affairs, IT data management and internal reporting. At any point in time AMAC comply with local law requirement.

**Service providers and business partners:** AMAC may share personal information with AMAC service providers and business partners that perform marketing services and other business operations for AMAC for the different purposes, e.g. process secure payments, fulfill orders, optimize services, send newsletters and marketing messages, support email and messaging services, and analyze information (advertising agencies and fraud prevention agencies).

**Law requirements:** AMAC may share personal information to protect AMAC rights, third party rights in accordance with law and regulations or by law enforcement agencies, courts, other government authorities.

**Transacting with AMAC:** AMAC may share personal information with potential transaction partners, service providers, advisors, and other third parties in connection with the consideration, negotiation, or completion of a corporate transaction (merger and acquisitions, transfer of assets or business lines). In the occurrence of such event AMAC provide Services

on best effort basis to be consistent with this Privacy Notice.

**Transmitting channels and processing of data:** AMAC has established a list of approved vendors whereby the data privacy requirement, data transmission, data processing and data storage including the operator/processor of data are scrutinized. In case the owner of the personal information decides to use other channels (e.g. chat, cloud upload, platforms) to transmit personal information data outside of the approved environment of AMAC, it would be at the owner's risk. Such channels of transmission are not supervised from AMAC because outside of the secured AMAC IT infrastructure. In such cases AMAC can't be made liable for possible wrong handling, data loss or data leak. In general, AMAC operates with transmitting or processing suppliers that are compliant to the Swiss Federal Data Protection Act or classified as adequate to European, Turkish or United Kingdom data privacy laws.

#### 4. RIGHTS OVER PERSONAL INFORMATION

The rights regarding the personal information held by AMAC are subject to AMAC policies and local law, e.g. rights to access, restrict, correct, delete or object to data usage, or receive a copy of the personal information, right to file a complaint with AMAC data protection officer ("DPO"), local data protection officer or local privacy regulator. See further below the contact of our DPO in paragraph 11.

For any additional questions, remarks, correction of information, changes or deletion request related to personal information, or exercise any rights under local law, please contact AMAC DPO at the contact information in paragraph 10. Any consent given can be withdrawn at any time.

#### 5. SPECIFIC COUNTRIES CLAUSES

Due to the international business orientation of AMAC additional clauses are taken into consideration beside the European, Turkish, Swiss or United Kingdom requirements:

For California residents

Pursuant to the California Consumer Privacy Act of 2018 ("CCPA"): We do not sell your personal

information to third parties and we will not sell your personal information to third parties unless provided otherwise by a specific privacy notice. We do not discriminate against California residents who exercise their CCPA privacy rights. To exercise your California privacy rights please refer to the section "How to exercise your rights".

For Chinese residents

We may provide and transfer your personal information to other entities in and outside of China in accordance with this privacy notice or for other legitimate reasons. We will comply with the applicable obligations and requirements under PIPL in relation to sharing and cross-border transfers of personal information.

#### 6. INFORMATION SECURITY AND STORAGE

AMAC Information Technology department has in place an infrastructure and security layer setup to accommodate and implement physical, technical, and organizational security measures to safeguard the personal information that AMAC is processing. On a regular basis AMAC evaluate and update these measures if necessary with the aim to provide on-going integrity and confidentiality of personal information. AMAC remind herewith that no information system is one hundred percent safe and secure.

AMAC retain personal information until the mutual contractual or any kind of relationship exists or as per AMAC local legal obligations, including retainment of records to investigate or defend against potential legal claims.

#### 7. INTERNATIONAL DATA TRANSFER

Due to the international clientele and business range of AMAC, Personal information may be transferred to, stored, and processed in a country that is not regarded as providing the same level of protection as under Swiss law or any law that is classified as providing adequate level of protection over personal information. If there are countries with no adequate level of protection the personal information may be available to the government of those countries under a lawful order made in those countries.

We have put in place appropriate safeguards and assessment, including contractual commitments, in

accordance with applicable legal requirements to provide adequate protections for personal information. For more information on the appropriate safeguards in place and to obtain a copy of such safeguards, please contact AMAC DPO (see paragraph 10).

## 8. DATA PRIVACY REQUESTS

For any questions relating to AMAC privacy notice or process, or submission of a data privacy request, please contact AMAC's DPO (see paragraph 10).

AMAC has a process in place for privacy request in alignment to this privacy notice and corresponding privacy rights. AMAC guarantee a process but not an outcome in the fulfillment of these data privacy rights. The process to address a data privacy request is described in three steps. The process starts with the verification of the identity of the requestor prior to a response of AMAC. Based on this verification a response is provided in due timeframe. In case of impossibility to answer or other reasons of no fulfillment, the requestor will receive a response including the rationale and indicating any further possible actions, including the right to appeal, if applicable.

## 9. PRIVACY NOTICE UPDATES

AMAC privacy notice and adjacent documents, e.g. cookie policy may be updated or adjusted at any time and without prior notice. Please consult AMAC website link "Privacy Notice" for the latest version of the Privacy Notice. Please consult for any other adjacent documents AMAC website.

## 10. DATA PROTECTION OFFICER ("DPO")

Do not hesitate to contact our DPO for any questions and request in relation of your data.

E-mail: [dpo\\_@\\_amacaerospace.com](mailto:dpo_@_amacaerospace.com)

**October, 2024.**