

DATA PROTECTION AND PRIVACY POLICY NOTICE

Introduction

Our data protection and privacy policy should assist you to understand how we may collect information from you and what we may do with this information. We are committed to safeguarding the privacy of our clients and visitors to this website (**visitors**).

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the General Data Protection Regulation) (the **GDPR**) is effective in the United Kingdom from 25 May 2018.

References in this notice to **Data Protection Law** means the United Kingdom's Data Protection Act 1998, the GDPR and other relevant legislation.

We handle personal data in accordance with, the Data Protection Act 1998. We comply with the GDPR and other relevant legislation.

Avcorp Services Limited trading as Avcorp Registrations is a company incorporated in England and Wales with company registration number 10593886 having its registered office at The Terminal Building, Gloucestershire Airport, Cheltenham, Gloucestershire GL51 6SR, United Kingdom and having its principal place of business at the same address.

The information we collect

You are not required to provide any personal information on the public areas of this website. However, you may decide to do so by completing any form on any section of this website or by otherwise contacting us to obtain information from us or engaging us to provide you with services. We may also collect information from you as a result of your relationship with our other clients or third parties who provide services to us.

Information which may identify you personally may include your name, residential address, business address, date of birth, nationality, passport number, email address, IP address, telephone number, family details, financial information (which may include bank account details), details of your education and details of your employment.

When we provide services to a client, that client may provide us with personal data relating to any individual who is a director, officer, employee, agent, servant or shareholder of it.

We request this information so that, among other things, we can comply with our internal compliance procedures and/or any laws and regulations under which we are bound, including anti-money laundering laws and regulations. Where you are an individual and where we provide services to you, we may request that the individual provides us with certain personal data including a copy of the individual's passport, a utility invoice and/or other official document specifying the individual's usual residential address. When we obtain information about you regarding your usual residential address, we may obtain document such as utility bills and this may disclose to us details of third party suppliers of utilities to you, account numbers for

utilities and other services provided to you and details of any amount you owe to the utility company.

We are not interested in receiving and/or retaining, and do not ask for, other data including any “special personal data” (also known as “sensitive personal data”), namely personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation or medical records. Any such “special personal data” / ”sensitive personal data” will be deleted if received.

How we use your information

We use personal information and data (together **personal data**) for the following purposes:

- to improve the design and content of this website;
- to provide visitors with access to the relevant parts of this website;
- to establish, manage and maintain our relationship with clients (customers) to whom we provide services;
- to administer and protect our business (including troubleshooting, system maintenance, support, reporting and hosting of data);
- to deal with enquiries made by visitors including providing you with further information about our services; and/or

Our core business is providing aircraft registration services to our client (customers). Where an individual or a corporate entity contacts

us with a view to engaging us to provide aircraft registration services, we request certain documents and information from the individual or corporate entity so that we can comply with appropriate laws and regulations including anti-money laundering laws and regulations and, accordingly, we seek to establish and verify the identity of all persons (individuals and corporate entities) that approach us with a view to us providing aircraft registration services. Accordingly, we may retain personal data relating to you or any individual who is a director, officer, employee, agent, servant or shareholder of a corporate entity for those purposes and we retain personal data so that we can comply with Data Protection Law, other applicable laws and regulations including anti-money laundering laws and regulations. Generally, we retain information relating to our clients (customers) for a period of seven years after we have completed providing services to the particular client (customer). We do not keep personal data longer than is necessary in order for us to comply with Data Protection Law.

We may use your personal data to contact you for your views on the services which we offer and about changes to such services and development of this website. Subject to obtaining your consent, we may contact you by email or post to market our services.

When you give us personal data that data may be sent electronically outside England, including to countries outside the European Economic Area (**EEA**) where legal protection of your personal data may not be as well developed as the data protection legislation in the EEA. We may disclose personal data to third parties who process information or provide other services for us and some of those third parties may be located outside the United Kingdom. Apart from this,

or unless we are required or allowed to do so by law, we will not distribute, sell or disclose any of your personal data without your consent.

Transmission of data by email and over the internet is not secure. We take appropriate measures to try to protect your personal data from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

Although we do our best to protect your personal data, you transmit your personal data to us at your own risk.

Your right to be informed

This data protection and privacy policy notice contains the information that we are obliged by Data Protection Law to supply to individuals.

If you have any concerns regarding the information that we provide to you, please address any enquiries in this regard to us by email at info@avcorpregistrations.com.

Right of access

You have the right to be provided with details of the personal data held by us.

If you notify us that you wish to exercise your right of access, we will, pursuant to Data Protection Law, provide you with the information which we are required to provide you with pursuant to Data Protection Law.

Under the GDPR, we must verify the identity of the person making a request for access to personal data, using reasonable means.

Therefore, if you make a request to us for access to any of your

personal data, we will either provide you with such information in an email or in a letter after we have verified your identity.

Where you exercise your right of access, we will provide details of the personal data that we hold free of charge unless a request is manifestly unfounded or excessive, particularly if it is repetitive, and in any such case we may charge a reasonable fee as permitted by Data Protection Law for responding to a request for access. Any fee that we may charge will be based on the administrative cost of providing the information.

If we refuse to respond to a request for access to your personal data, we will explain to you why we refuse any such request and we will, without undue delay and at least within one month, inform you of your right to complain to the relevant supervisory authority and regarding any judicial remedy.

Please address any request in this regard to us by email at info@avcorpregistrations.com.

Your right to rectification

Pursuant to Data Protection Law, individuals are entitled to have personal data rectified if it is inaccurate or incomplete.

If any individual informs us that any personal data held by us is inaccurate or incomplete, we will respond within one month of receipt of a request for rectification, provided, however, that pursuant to Data Protection Law, where a request for rectification is complex, we may extend the period to two months.

If we have disclosed personal data to a third party or to any third parties and such personal data should be rectified, we will inform the relevant third party or third parties of the rectification, where possible,

and we will inform you about the third parties to whom the personal data has been disclosed, where appropriate.

Where we do not take action in response to a request for rectification, we will explain why to the individual, informing the individual of the individual's right to complain to the relevant supervisory authority and for a judicial remedy.

Please address any request in this regard to us by email at info@avcorpregistrations.com.

Your right to erasure

Pursuant to Data Protection Law, you have the right to request that we erase your personal data.

Accordingly, you have the right at any time to notify us by telephone and/or in writing including by email and/or letter that you wish your personal data to be erased. In particular, this enables you to ask us to erase your personal data where there is no good reason for us to continue to hold it.

If you request that your erase your personal data, we will promptly consider any such request.

Pursuant to Data Protection Law, we can refuse to comply with a request for erasure in certain circumstances, including where refusal relates to the exercise of defence of legal claims.

Accordingly, we may, prior to considering any request for the erasure of any personal data, require the person requesting the erasure of the personal data to confirm that the person does not wish us to provide any further services to the individual in the future and/or does

not have any existing and/or potential legal claim against us in respect of any services previously provided by us.

Where it is appropriate for us to erase your personal data, we will erase your personal data within the time period permitted by Data Protection Law.

If we have disclosed personal data to any third party or any third parties and if you require us to erase such personal data, we will inform the third party or third parties about the erasure of the personal data, unless it is impossible or involves disproportionate effort to do so.

Please address any request in this regard to us by email at info@avcorpregistrations.com.

Your right to restrict processing

Under Data Protection Law “processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaption or alternation, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

You have the right to obtain from us restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;

- we no longer need the personal data for the purposes of processing, but the personal data is required by you for the establishment, exercise or defence of legal claims; and/or
- you have objected to the processing of data pending the verification whether our legitimate grounds override your rights.

We may need to review procedures to ensure that we are able to determine whether we may be required to restrict the processing of personal data.

If we have disclosed the personal data in question to a third party or third parties, we will inform the third party or third parties about the restriction on the processing of the personal data, unless it is impossible or involves disproportionate effort to do so.

Where you have obtained restriction of processing, we shall inform you if and when we decide to lift a restriction on processing.

Please address any request in this regard to us by email at info@avcorpregistrations.com.

Your right to object

Under Data Protection Law, individuals have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

Individuals have the right to object on grounds relating to the individual's particular situation.

If we receive an objection on grounds relating to an individual's particular situation, we will stop processing the personal data unless:

- we can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
- the processing is for the establishment, exercise of defence of legal claims.

We do not process data for profiling purposes.

Please address any request in this regard to us by email at info@avcorpregistrations.com.

Your right in relation to automated decision making and profiling

We do not make decisions based on automated data processing.

We do not process personal data for profiling purposes.

Please address any request in this regard to us by email at info@avcorpregistrations.com.

Your right to lodge a complaint with a supervisory authority

If you have a complaint regarding our activities in respect of your personal data, you have the right to complain to:

Information Commissioner's Office

www.ico.org.uk

Helpline: +44 (0) 303 123 1113

Is the provision of personal data part of a statutory or contractual requirement or obligation and what are possible consequences of failing to provide the personal data?

We only require certain personal data so that we can provide aircraft registration and/or other services to our clients (customers) and to enable us to comply Data Protection Law and other laws and regulations relating to anti-money laundering.

If you wish to engage us to provide such services but do not wish to provide us with certain personal data, this may mean that we may be unable to accept you as a client (customer) and we will therefore not be able to provide you with such services.

Automated decision making, including profiling and information about how decisions are made, the significance and the consequences

We do not make automated decisions based on any personal data.

Links to other websites

To the extent that this website contains a link to other websites, we recommend that visitors should consult the other website's privacy policies as we have no control over information which is submitted to, or collected by, third parties. By including a link to another website from this website we are not recommending or endorsing that website, the organisation which hosts that other website, or the content of that other website.

Social media

Neither we nor our directors and officers hold social media accounts.

Who we share our data with

We may share our data with any or all of the following (each of whom have certain duties of confidentiality to us):

- our accountants and auditors;
- our bankers;
- our information technology support providers and consultants;
- our legal advisers; and/or
- our document production services providers (who copy documents for us and who produce bibles and files for us).

Save as mentioned above and save as may be permitted by Data Protection Law and laws and regulations relating to anti-money laundering and other applicable laws and regulations, we do not share personal data with any third parties. We do not sell personal data to any third parties.

General

We implement appropriate technical and organisational measures to ensure and demonstrate that we comply with Data Protection Law, other laws and regulations relating to anti-money laundering and other applicable laws and regulations. We have internal data protection policies and engage in regular staff training, internal audits of processing activities and review of our internal human resources policies.

We periodically review the personal data that we hold and delete irrelevant and/or out of date personal data.

Data controller

We are not required to appoint a data protection officer and have chosen not to do so.

Changes to this data protection and privacy policy

We have the right to change the terms of this privacy policy at any time without notice. Therefore, please check this page from time to time to ensure that you are aware of any changes.