

Introduction

Welcome to the OAG Aviation Group privacy notice.

The OAG Aviation Group respects your privacy and is committed to protecting your personal data. This privacy notice aims to give you information on how the OAG Aviation Group collects and processes your personal data gathered through any one of the ways we may engage with you such as (without limitation), when you use the OAG.com website and any OAG product-related website (**our websites**, excluding flightview.com, which has its own, separate privacy notice) (regardless of where you visit them from), when you order products or services from us, when you sign up to receive a newsletter, or attend an event we have organised, or where there is an understanding for us to communicate with you following a commercial meeting or a meeting at a business event, or because we have identified you or your business as a prospect, or because you supply goods or services to us.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. *IMPORTANT INFORMATION AND WHO WE ARE*

2. *[HOW TO CONTACT US]*

3. *[THE DATA WE COLLECT ABOUT YOU]*

4. *[HOW IS YOUR PERSONAL DATA COLLECTED]*

5. *[HOW WE USE YOUR PERSONAL DATA]*

6. *[DISCLOSURES OF YOUR PERSONAL DATA]*

7. *[INTERNATIONAL TRANSFERS]*

8. *[DATA SECURITY]*

9. *[DATA RETENTION]*

10. *[YOUR LEGAL RIGHTS]*

11. *[GLOSSARY]*

1. Important information and who we are

It is important that you read this privacy notice together with any other privacy notice or fair processing 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. This privacy notice supplements the other notices and is not intended to override them.

Our websites are not intended for children and we do not knowingly collect data relating to children.

Controller

The OAG Aviation Group is made up of different legal entities, details of which are below. This privacy notice is issued on behalf of the OAG Aviation Group, so when we mention the OAG Aviation Group, "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the OAG Aviation Group responsible for processing your data.

OAG.com is owned by OAG Aviation Worldwide Limited

OAG Aviation Worldwide Limited is the controller where data is collected (i) within the European Economic Area (**EEA**), Africa, the Middle East; and (ii) in Japan (for print products only).

OAG Aviation Worldwide LLC is the controller where data is collected in the Americas and the Caribbean.

OAG Aviation Pte Ltd is the controller where data is collected (i) in all other regions of the world and (ii) in Japan (for digital solutions only).

Where you reside in the UK you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). Where you reside outside the UK but within the EEA you have a right to make a complaint at any time to the appropriate supervisory authority for your country of residence. See <http://ec.europa.eu> for these details.

Where you reside outside of the EEA we will apply your legal rights as applicable to the data laws in the jurisdiction you are in.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO or any other supervisory authority so please contact us in the first instance.

What entities are part of the OAG Aviation Group

OAG Aviation Group Entities: OAG Aviation Worldwide Limited (UK)
OAG Aviation Worldwide LLC (USA)
OAG Aviation Worldwide Pte Ltd (Singapore)

2. How to contact us

We have appointed a group data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below:

Email Address: privacy@oag.com

Postal Address: 1 Capability Green, Luton, Bedfordshire, LU1 3LU, United Kingdom

Phone: +44 (0)1582 695050

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 26th April 2018.

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

Our websites 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 websites, we encourage you to read the privacy notice of every website you visit.

3. 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 as follows:

- **Identity Data** includes first name, last name, username or similar identifier, and title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and 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, language, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our websites, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our Internal or External Third Parties (see Glossary) and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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.

4. How is your personal data collected?

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

- **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:
 - apply for our products or services;
 - create an account on one of our OAG product websites (become a user);
 - subscribe to our service or publications;
 - request marketing (e.g. a newsletter) to be sent to you;
 - enter a competition, promotion or survey;
 - make an enquiry via our websites; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns of use on our websites. We collect this personal data by using cookies, server logs and other similar technologies. 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. As this list changes from time to time, please contact us if you want more details.
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EEA;
 - (b) advertising networks based inside or outside the EEA; and
 - (c) search information providers based inside or outside the EEA.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EEA.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EEA.

5. 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.

See our glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

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. You have the right to withdraw consent to marketing at any time by contacting us at contactus@oag.com.

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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Usage (d) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or

and hosting of data)		group restructuring exercise or sale) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our websites, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising; for example, if you have registered as a user of our OAG.com website you can modify your preference settings at any time by following the opt-out links on any marketing message sent to you or by contacting us at contactus@oag.com.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with your details when you entered a competition or registered for a promotion or attended a conference (for example) and, in each case, you have not opted out of receiving that marketing.

We may also be sending you this privacy notice because we have your business card from an event or consider that you are a potential customer. We would like to add you to our contact list and send you marketing. We are able to do this as you are a business contact and further, you can opt out of receiving marketing from us at any time.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the OAG Aviation Group of companies for marketing purposes.

Opting out

You can ask us or third parties 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 contactus@oag.com 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 product/service purchase, product/service experience or other transactions.

Cookies

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 our websites may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

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.

6. 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 in paragraph 5 above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. 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.

7. International transfers

We share your personal data within the OAG Aviation Group. This will involve transferring your data outside the EEA, as it is a global concern.

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules".

Many of our External Third Parties are based outside the 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 that the recipient third party agrees to contractual clauses.

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 certain periods of time, e.g. seven years after they cease being customers for financial, accounting and tax purposes. For our retention policy regarding other areas of the business, please contact us for more details.

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. Please click on the links below to find out more about these rights:

- [*Request access to your personal data*].
- [*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.

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 to which we are subject.

THIRD PARTIES

Internal Third Parties

Other companies in the OAG Aviation Group can be found in the *What entities are part of the OAG Aviation Group* section.

External Third Parties

- Service providers acting as processors based either within the EEA or outside of the EEA (and so are subject to specific contractual requirements) who provide IT and system administration services.

- Professional advisers including lawyers, bankers, auditors and insurers based within the EEA or outside of the EEA, who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based within the EEA or outside of the EEA who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "**data subject access request**"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.