

## E-SORS PRIVACY POLICY

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This Privacy Policy applies to the personal data collected by the European Business Aviation Association Internationale sans but lucratif (hereinafter the “**Association**” or “**We**”), having its registered seat at 1040 Brussels, avenue de Tervueren 13A, box 5 and with company number 425.678.758, via <http://esors.ebaa.org> and the E-SORS System (as defined in the E-SORS terms of use [[esors.ebaa.org/content/terms-agreement](http://esors.ebaa.org/content/terms-agreement)]). By registering or sending any data through this website and the E-SORS System, you may provide the Association with personal data. Your personal data are processed under the control of the Association as defined above, in compliance with the Data Protection Act of 8 December 1992 and its implementing decrees.

This Privacy Policy describes how and when <http://esors.ebaa.org> and the E-SORS System collect, use, and share your information when you use the E-SORS System and the E-SORS services under the E-SORS terms of use [[esors.ebaa.org/content/terms-agreement](http://esors.ebaa.org/content/terms-agreement)], including the present website (the “**Services**”). We receive your information through the present website, your email notifications, and your other interactions with our Services and/or the E-SORS System. When using any of our Services or registering on our website, you consent to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy. Irrespective of which country you reside in or supply information from, you authorize E-SORS to use your information in any other country where E-SORS operates where a suitable level of privacy protection applies.

Capitalized terms that are not defined in this Privacy Policy have the meaning given to them in our E-SORS terms of use.

### 1. **WHAT ARE PERSONAL DATA?**

In this Privacy Policy personal data means information or pieces of information that allow identifying you. Personal data typically include your name, address, personal e-mail address and personal order/subscription/licensing details.

### 2. **WHAT PERSONAL DATA DO WE COLLECT?**

We may collect your personal data from different sources including:

- Personal data you provide to us directly (e.g. by registering and ordering an E-SORS license on this website, by using the Services and/or the E-SORS System, etc.).

The personal data we collect from you directly may include inter-alia your:

- name
- address
- telephone number
- e-mail address
- where applicable credit card or other payment information

- gender
  - user and licensing habits
- Personal data we collect when you use this website.

**Links:** We may keep track of how you interact with links across our Services, including our email notifications, third-party services, and client applications, by redirecting clicks or through other means. We do this to improve our Services, and to compose aggregate click statistics such as how many times a particular link was clicked on.

**Cookies:** Like many websites, we and third party providers acting on our behalf use "cookie" technology to collect additional website usage data (number of users, date and time of their visit and the pages accessed) and to improve our Services, but we do not require cookies for many parts of our Services and website. A cookie is a small data file that is transferred to your computer's hard disk. E-SORS may use both session cookies and persistent cookies to better understand how you interact with our Services, to monitor aggregate usage by our users and web traffic routing on our Services, and to customize and improve our Services. Most Internet browsers automatically accept cookies. You are accordingly accepting the collection of data and that these data will be processed or used for purposes of contact, execution of agreements, the protection of our legitimate commercial interests or other purposes indicated by you. If you do not want cookies from E-SORS or other websites, you can instruct your browser, by changing its settings (usually in "preference"), to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. However, some Services may not function properly if you disable cookies. Please find more information on cookies at the following addresses: <http://www.allaboutcookies.org/> and <http://www.aboutcookies.org/>.

**Log Data:** Our servers automatically record information ("**Log Data**") created by your use of the Services. Log Data may include information such as your IP address, browser type, operating system, the referring web page, pages visited, time of visit, location, your mobile carrier, device and application IDs, search terms, and cookie information. We create Log Data when you interact with our Services, for example, when you visit our website, sign into our Services, view content hosted by E-SORS, or interact with our email or other notifications. E-SORS uses Log Data to provide our Services and to measure, customize, and improve them.

**Third-Parties:** E-SORS uses a variety of third-party services to help provide our Services, such as hosting and distributing our content, and to help us understand the use of our Services, such as Google Analytics. These third-parties may collect information sent by your browser or mobile device, such as cookies, your IP address, usage data, or device ID.

- Personal data we collect from other sources.

We may collect personal data about you from other legitimate sources such as third party data aggregators, promotional partners, public sources and third party social networks.

The personal data we collect from such sources may include inter-alia your:

- name
- address
- e-mail address

- user habits

Some contact information may be required in order to use certain Services.

### 3. HOW DO WE USE YOUR PERSONAL DATA?

We may use your personal data for the following purposes:

- To create and maintain your account on this website;
- To process your orders and requests made via this website;
- To provide you with information regarding products and/or services that may be of interest to you, provided you have given us an opt-in or you have previously ordered products from us and the communication is related to similar products.
- to contact you where necessary for the provision of the services you have requested;
- to enable the Association to provide you with access to all relevant parts of the present website;
- to help you connect with E-SORS users;
- to connect to other Services: Services include several features to help connect you to the accounts of people you already know. E-SORS will match the information you provide with the information of other E-SORS users in order to provide and improve the Services, for example by making recommendations;
- to improve our products and your experience on the present website by:
  - analysing our advertisements;
  - evaluating the use of this website;

### 4. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with:

- affiliates;
- service providers: we engage service providers to perform functions and provide services to us such as management of our customer database, processing of orders, online payment, etc.. We may share your private personal information with such service providers subject to confidentiality obligations consistent with this Privacy Policy, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions. ;
- promotional partners in case we run an offer with another partner;
- public authorities or other third parties if required to do so by law or court order, to protect the safety of any person; to address fraud, security or technical issues; or to protect E-SORS's rights or property.

**Non-Private or Non-Personal Information:** We may share or disclose your non-private, aggregated or otherwise non-personal information, such as your public user profile information, public posts, the people you follow or that follow you, or the number of users who clicked on a particular link (even if only one did).

**Business Transfers:** In the event that EBAA is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction. The undertakings in this Privacy Policy will apply to your information as transferred to the new entity.

We will never sell or rent your personal data to third parties. Nothing in this Privacy Policy is intended to limit any legal defences or objections that you may have to a third party's, including a government's, request to disclose your information.

## **5. WHERE DO WE TRANSFER YOUR PERSONAL DATA?**

Your personal data may be accessed by or transferred to suppliers, members of the association or staff of the Association in the European Economic Area, for and to the extent required by the purposes set out in this statement.

If your personal data would be transferred to a country that does not provide an adequate level of protection, we will ensure that appropriate safeguards (contractual clauses or, applicable regime replacing Safe Harbour) are put in place before transferring your personal data.

## **6. CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA**

The Association employs appropriate security measures to protect your personal data from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage, such as encryption, firewalls and (in certain areas) SSL (Secure Socket Layers). However, as effective as encryption technology is, no security system is impenetrable. We cannot guarantee the full security of our database, nor can we guarantee that information you supply won't be intercepted while being transmitted to us over the Internet or any other network. We recommend that you not disclose your passwords to anyone.

Where your personal data can be accessed by or transferred to processors, the Association has made contractual arrangements in order to ensure the confidentiality and security of your personal data and, more generally, their processing in accordance with the Data Protection Act of 8 December 1992 and its implementing decrees.

### **Links to Other Websites and Services**

We are not responsible for the practices and security of websites or services linked to or from the Services, including the information or content contained therein. When you use a link to navigate from the Services to another website, our Privacy Policy does no longer apply. Your browsing and interaction on any third-party website or service, including those that have a link or advertisement on our website, are subject to that third party's own terms. In addition, we shall not be responsible for and do not have any control over any third-parties that you authorize to access your Content. If you are using a third-party website or service (like LinkedIn or twitter) and you allow such a third-party access to your Content you do so at your own risk.

## **7. WHAT RIGHTS DO YOU HAVE?**

You have the right:

- to request access to your personal data;
- to request that we correct, update or delete your personal data or your account;
- to oppose to the processing of your personal data for direct marketing purposes.
- In addition, you can opt-out from direct marketing communications at any time by following the relevant instructions on the direct marketing communications.

To exercise your rights, you may contact us by:

- phone at: +32 2 766 00 70

- e-mail at: [safety@ebaa.org](mailto:safety@ebaa.org)
- mail at: EBAA – Safety Department, Avenue de Tervuren 13a , 1040 Brussels, Belgium

## **8. CHANGES TO THIS POLICY**

We may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your information and will always be at <http://www.esors.ebaa.org>. If we make a change to this policy that, in our sole discretion, is material, we will notify you via an email to the email address associated with your account or through the Services. By continuing to access or use the Services and/or the E-SORS System after those changes become effective, you agree to be bound by the revised Privacy Policy.

If you have further privacy concerns please do not hesitate to ask us by contacting [safety@ebaa.org](mailto:safety@ebaa.org)

Last update: 24 June 2016