

Sources and Uses of Personal Information

In this document, references to ‘we’, or ‘us’ means all or any Gama Aviation Plc group entity, as the context requires. Whenever you visit the Gama Aviation website, or communicate with us by any other means, when you use the services of any of our Business Units or otherwise engage with us, we may collect different types of personal data. In the course of our business, we may also obtain personal data from other sources, such as other services suppliers, and/or create some personal data ourselves as a result of our interactions with you.

We would like to assure you that where you are simply a user of the Gama Aviation Plc website, Gama Aviation cannot identify you personally unless in addition you are logged in to any online account that may have been set up with us. Furthermore, we will have no need and will not try to identify you from any online identifiers, such as your IP address except in the rare event that we need to conduct a cyber security incident investigation.

The nature of the relationship we have with you will dictate what, if any, personal data we are likely to collect about you and why and how we will want to use it. This document sets out the types of personal data that may be collected by a Gama Aviation group entity (or that may be collected by a service provider on its behalf) when acting as the responsible Data Controller entity, (meaning a party that determines the purposes for which and the means by which personal data is collected and processed). Occasionally, personal data will be received from third party sources such as your employer, or obtained from information that is made publicly available online, such as those details made available on the UK Companies House website.

Below is some further information about the sources of personal information that may be obtained / accessed by an entity in the Gama Aviation Plc group of companies, some information on what personal information collected by the Gama Aviation group is used for, and the legal basis for use of the information obtained.

Type of personal information	Potential Sources
Contact Information	
<p>With existing or potential customers of a Gama Aviation group entity and/or other private individuals who get in touch with us, (such as job applicants), we will likely collect contact information; such as name, residential address, email address, telephone numbers.</p> <p>If contacting us in a work capacity on behalf of a customer or potential customer, we will likely also collect your job title and, if a potential customer is a corporate entity, we will wish to collect via our Know Your Counterparty onboarding process similar contact information concerning directors and/or beneficial owners (please see Third Party Vetting Section, below).</p>	<p>You or your applicable employer, business manager, booking / charter agent or any other person commissioning services or making enquiries about job roles or our services on your behalf.</p> <p>You or your employer entity.</p>

<p>With suppliers (including our subcontractors, business collaboration agreement partners and individuals associated with our suppliers, business partners and subcontractors): business contact information (such as name, employer name, job title, address, email, telephone numbers).</p>	<p>You or your employer entity.</p>
<p>Identification and Other Regulatory Information</p>	
<p>For customers of the Business Aviation and/or Technology & Outsourcing business units (including charter as well as aircraft management, and including users of certain of the myairops[®] software products), we will collect travel and identification information, such as passport / visa information, (and possibly driver’s licence and car registration number, but only if you will be parking at a Gama Aviation managed site, or have requested Gama Aviation to arrange car hire services for you). In connection with travel arrangements, we will also collect aircraft tail number(s), flight details and ground handling information, together with contact and identity information about other passengers (if any, other than the person for whom the travel arrangements are made).</p> <p>For existing or potential customers of the Engineering Service Line or Technology & Outsourcing division including Continuing Airworthiness management and related services, we will collect aircraft tail number(s) and certain flight-related details.</p> <p>CCTV footage, if you visit some of the Gama Aviation group’s managed sites.</p>	<p>You, your employer entity, your booking / charter agent or any other person commissioning or making enquiries concerning the services of Gama Aviation’s Business Aviation or Technology & Outsourcing business units on your behalf.</p>
<p>Other Information</p>	
<p>For individual customers / passengers, we may collect dietary, allergy, health (including healthcare and treatment information) and/or access requirements, (including but not only in relation to passengers of patient transfer services operated by Special Mission division), personal or professional interests and/or other individual preferences and information about other people (such as other</p>	<p>You, your booking / charter agent or, in relation to passengers of patient transfer services only, medical practitioners attending or otherwise treating you.</p>

<p>passengers) shared with us in connection with travel arrangements or services to be provided ancillary to the travel, such as catering services.</p>	
<p>Third Party Vetting</p>	
<p>For individual customers/suppliers or directors and other key office holders of corporate customers/suppliers and counterparties, (including parties to any Merger / Acquisition activity contemplated, agents, joint venture partners, representatives, senior level hires, consultants, licensees, or intermediaries): third party vetting information including (name, alias, title, gender, place of birth, date of birth, ID number (if applicable), images, relatives/close associates, country of citizenship and residence, occupation(s), watchlist status, adverse media articles, details of shareholders, whether there is any legal action pending against you and your relationship with public officials and state-owned enterprises).</p>	<p>You, your booking / charter agent or publicly available resources, credit reference agencies, other third-party agencies and/or professional advisers and/or systems used for legal and/or regulatory checks.</p>
<p>Billing and Financial Information</p>	
<p>For individual customers, we will collect financial information (including billing details, bank account information or credit/debit card details and credit reports).</p>	<p>You, your booking / charter agent or any other person commissioning services or making enquiries about our services on your behalf, and credit reference agencies or third-party systems used for our legal and/or regulatory checks.</p>
<p>Communications Data</p>	
<p>Communications received from you through our website, over e-mail or otherwise.</p>	<p>You or any other person commissioning services or making enquiries about our services on your behalf.</p>
<p>Browsing and Device Usage Information</p>	
<p>With website users, we will collect technical and usage information (user name and passwords used in relation to our platforms and services, IP address and other online identifiers, account settings,</p>	<p>You.</p>

<p>browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, other technology on the devices used to access our website and information about how our website is used, or how services are used).</p> <p>For guest WiFi users, we will also collect MAC address (Media Access Control address) and the location of each device connected to the network.</p>	
<p>Marketing Information</p>	
<p>Marketing information (service usage status and history, marketing preferences, reports of experiences with our services, if any, and contact preferences).</p>	<p>You or your employer entity.</p>

Uses of your personal information

Gama Aviation group entities may process your personal data for many different purposes when you visit the Gama Aviation website, use or enquire about Gama Aviation group services, purchase goods (including aircraft parts) or otherwise communicate or engage with us.

The law requires that we must always have a permitted reason or justification (called a “lawful basis”) for processing your personal data. You can read more about the reasons for processing personal data and the lawful bases on which we rely for such processing, in the table below.

For some processing activities, we consider that more than one lawful basis may be relevant, depending on the circumstances. The applicable purpose will also vary according to which Gama Aviation entity is the ‘controller’ of personal data. If the stated basis for use of personal information is shown as “contract”, this means that a Gama Aviation entity or entities providing information or goods and/or services to you is using personal data in order to perform a contract with you, or to take steps at your request prior to entering a contract with you. Where the stated use basis is ‘legal obligation’, this means that personal information is collected in order to comply with a legal obligation to which the Gama Aviation entity or entities concerned is/are subject. Where the stated use basis is our ‘legitimate interests’, this means that the relevant Gama Aviation entity or entities consider(s) to have a fair, proportionate and overriding lawful business reason to use your details. This will occur primarily where, by using the information collected, we learn about you or develop our relationship with you, to enable us to work with you more closely and more efficiently, or to make sound business decisions involving or affecting you.

Personal information collected may be converted into statistical or aggregated form, or we may anonymise it, to protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct analysis, including to produce statistical research and reports to develop and/or to improve our services.

Personal data will not be sold or licensed outside the Gama Aviation Plc group of companies for marketing purposes.

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Providing services				
<p>Responding to requests or general enquiries (including in relation to any existing contract)</p> <p>Where you request an estimate for services using applicable facilities on our website, we will ask you to provide your name, job title, company (and jurisdiction), telephone number, (sometimes a fax number) and email address.</p>	✓	✓		✓ (To enable us respond to enquiries).
Establishing you / your organisation as a customer or a supplier on our systems		✓	✓	
Fulfilling a service request by providing the requested services		✓	✓ (e.g. if travel or maintenance services)	
Taking payment from you in respect of goods / services provided		✓		✓ (For credit control purposes).
Sending you solicited industry updates and service-related communications	✓	✓		✓ (To keep you updated).

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Sending materials to you about our services and communicating with you about our business	✓			✓ (To keep you updated).
Receiving you at any of our office premises or FBOs, or at one of our hangars (or apron) or related facilities, or at our facilities at trade shows or for providing hospitality services.		✓ (To receive customers while waiting to travel (FBOs), or to enable inspection of aircraft following maintenance)	✓ (There may be a regulatory requirement to collect information in relation to visitors who require to go airside at any of our FBOs, or to comply with confidentiality obligations owed to other customers at the location).	✓ (To receive our customers and prospective customers).
Conducting surveys (where participation is optional), assessing performance and/or improvement needs, and/or for marketing purposes	✓			✓ (To resolve any problems or complaints and improve our services or products).
Managing business relationships with customers; assessing performance, investigating and resolving any		✓		✓ (To meet or exceed

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
problems, complaints or disputes				expected service levels and/or to use best efforts to resolve any complaint or dispute).
To create accounts and enable log-in via online portals (or directly from the website), for example for existing or potential customers to request a cost estimate for maintenance or other services, or to receive alerts concerning the potential for 'empty leg' charters)	✓	✓	✓	✓ (Access to a private log-in where you can access information relevant to you helps to facilitate the conduct of business with you and facilitates privacy of dealings).
To enable access to our guest WiFi, where available at a Gama Aviation managed site, and to ensure proper operation and performance of the website, networks, and platforms, including to monitor its use, to check security and integrity on an ongoing basis and to checking and assess improvement needs as regards system functionality. Where				✓ (To help ensure that Gama Aviation systems are being used for legitimate purposes and to help

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
travel services are provided, this may include use of Gama Aviation’s systems to track journeys through its systems to assess, customise and improve services				protect those systems, Gama Aviation and others including customers and potential customers from illegal activity).
Ensuring appropriate use of the Gama Aviation website in accordance with the terms and conditions of its use and Gama Aviation policies, to ensure efficient operation of the site for all users		✓		
Legal and Regulatory Compliance and Reporting				
Performing customer, potential customer and/or counterparty due diligence and other screening and/or risk management activities including identity and conflict checks, source of funds checks (if required), credit searches and checks, screening and checks against third party sources, for anti-bribery and corruption and/or economic sanctions regulations			✓	

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Co-operation with police, immigration authorities and other regulatory and/or tax authorities, where there is a legal requirement to do so		✓	✓	
To determine and enforce Gama Aviation's legal rights and obligations, to identify and record fraudulent activity online, to prevent, help detect crime and to meet legal obligations for data security			✓	✓ (To help protect Gama Aviation's systems, the Gama Aviation group and customers from illegal activity).
Using customer financial information and retaining details of your payment history to evaluate and keep track of credit-worthiness, whether as a potential or existing customer or supplier	✓	✓		✓ (To protect Gama Aviation's business against financial risks when considering an application for credit or when assessing security of supply).
Responding to legally binding requests for information,			✓	

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
including under search warrants or court or similar orders from government departments, regulatory and/or enforcement bodies and authorities				
Responding to other requests from courts, government departments, regulatory bodies and authorities				<p>✓</p> <p>(Where necessary or on legal advice, it is in Gama Aviation's and in the public interest to respond to proportionate requests from authorities).</p>
Complying with general regulatory and statutory obligations, including to demonstrate compliance with relevant legal and regulatory requirements			<p>✓</p>	
For proper record-keeping and to manage customer/supplier relationships, for compliance with legal obligations including as regards accounting records, for taxation and other purposes, and otherwise for		<p>✓</p>	<p>✓</p>	<p>✓</p> <p>(Customer related information and files are retained, for</p>

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
good corporate governance, risk management				reference purposes in connection with any complaint, request or to conduct investigation).
General Business				
Training staff			✓	✓ (Where appropriate, use of personal information for staff training helps to manage risk and improve service performance).
Undertaking third party vetting of potential and some existing contract counterparties, including potential acquisition target entities, co-venturers, sub-contractors and suppliers, consultants, intellectual property licensees, tenants, customers and their intermediaries, and in	✓		✓	✓ (For the purpose of risk management).

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
connection with negotiating the terms of any contracts				
General record-keeping and relationship management with our customers / suppliers/contractors/business partners		✓	✓	✓ (For proper records management, to assist in the event of queries).
Managing, planning and delivering business strategies				✓ (To implement effective business management and marketing strategies).
Continuous improvement of services; service development				✓ (To facilitate continuous improvement).
To seek legal advice, to establish and enforce legal rights and obligations, including in connection with any existing legal or potential legal proceedings				✓ (To establish and defend legal rights, meet obligations, and seek

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
				legal advice in connection with them).
Monitoring and producing statistical information regarding the use of our platforms, and analysing and improving their functionality				✓ (To perform routine monitoring so as to ensure platforms work correctly, analyse how they are used and to help improve them).
Maintaining the security and integrity of Gama Aviation systems, platforms and communications (and detecting and preventing actual or potential threats to them)			✓	✓ (To ensure that business processes and facilities are secure).
Managing proposed business or corporate sales, restructuring, transfer or merging of any or all part(s) of the business, including to respond to queries from a prospective buyer				✓ (To sell any part of the group's business as required).

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Visitors to our premises				
Arranging taxis, transport or other services, as and when requested. Depending on the request, if required by a third party service provider it may be necessary to disclose personal information in order to make the booking, including but not limited to: Name, contact provide personal information details, (including possibly passport details), pick up and drop off location.	✓	✓		
Enabling you to access our guest WiFi.				✓ (To help facilitate business with you).
Maintaining security measures at Gama Aviation sites, including capturing images via CCTV and building access controls. Appropriate signage warns visitors that CCTV is in operation. Images captured are securely stored and only accessed on a 'need to know' basis (such as to investigate an incident). CCTV recordings are typically overwritten after a short period of time, except where an issue is identified that requires investigation				✓ (To assist the security and safety of our personnel and members of the public and to help prevent and detect crime).

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
(such as a public order incident).				
Maintaining security measures at Gama Aviation sites, including requiring visitors to sign in at Reception and keeping a record of visitors for a short period. Visitor records are securely stored and only accessible on a 'need to know' basis (e.g. to investigate an incident). Information collected for visitor records includes, name, telephone number, car registration (if you are parking at a Gama Aviation managed site), company represented, time in and time out.				<p>✓</p> <p>(To promoting security and safety of Gama Aviation personnel and members of the public and to prevent and detect crime).</p>
Suppliers				
Managing business relationships with suppliers /sub-contractors/business partners and their personnel, as necessary to receive required goods and/or services (including arranging payment of invoices).		<p>✓</p>		<p>✓</p> <p>(To engage third parties and to manage business relationships with suppliers).</p>
Personal data about individuals involved in providing sub-contracted services or supplies may be collected, to help administer				<p>✓</p> <p>(To engage third parties, to</p>

Purposes of processing	Lawful basis			
	Your explicit consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
and manage relationships with suppliers through their staff, and to provide such services and supplies to Gama Aviation customers.				help arrange for the provision of services or other supplies for Gama Aviation group customers).

Purposes for processing special category personal data

Purposes for processing special categories Purposes for processing special category personal data	Lawful basis for collecting / processing special category data			
	You have given your explicit consent	It is necessary to protect somebody's vital interests or they are incapable of giving consent	It is necessary for the establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest
Receiving you at any of our office premises or FBOs, or at one of our hangars (or on the apron) or for receiving related facilities, or at our facilities at trade shows or for	✓ (for your dietary and access requirements)	✓ (in case of accidents or emergencies at a Gama Aviation-managed site)		

Purposes for processing special categories Purposes for processing special category personal data	Lawful basis for collecting / processing special category data			
	You have given your explicit consent	It is necessary to protect somebody's vital interests or they are incapable of giving consent	It is necessary for the establishment, exercise or defence of legal claims	It is necessary for reasons of substantial public interest
providing hospitality services.				
<p>Fulfilling a services request and providing the services.</p> <p>This may reveal health-related information, such as when you inform us of special dietary or other requirements or special needs, or when you are a passenger in relation to patient transfer services. It may also reveal race/ethnicity data if clear from passport and/or visa details.</p>	✓	✓	✓	

<p>Providing your personal data to police, immigration authorities and other regulatory authorities, where there is a legal requirement to do so in relation to any travel arrangements, including arrival or departure information</p>		<p>✓</p>	<p>✓</p>	
<p>Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities</p>			<p>✓</p>	
<p>Investigating, and demonstrating, monitoring, improving, reporting on and meeting compliance requirements (such as anti-bribery, know-your-client checks, disability discrimination and health & safety compliance)</p>			<p>✓</p>	

<p>Obtaining legal advice, establishing, defending and enforcing our legal rights and obligations in connection with, any legal proceedings (including prospective legal proceedings)</p>			<p>✓</p>	
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How we keep your personal information secure

The Gama Aviation group of companies takes the security of data held by it very seriously and we take such steps as are required by applicable data protection laws) to protect personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. Gama Aviation personnel and third-party services providers who have access to confidential information (including personal information) are subject to confidentiality obligations. Please be aware, however, that the transmission of information via the internet is not completely secure. We will do our best to protect your personal data, but we cannot guarantee the security of data transmitted to us over e-mail and any transmission is at the sender’s risk. Once received, we will use strict procedures and security features to try to prevent unauthorised access. You are responsible for keeping any passwords you use to access Gama Aviation’s platforms secure.

Disclosure of your personal information

Within the Gama Aviation Plc group of companies

The Gama Aviation group of companies has operations in various locations around the world. A Gama Aviation entity that receives and is responsible for your personal data as the Data Controller may need to share that data with other companies in the group for one or more of the following purposes:

- in connection with customer relationship management. For example, if you are a customer or prospective customer, we may add your personal data to a client contact database. A list of the countries where Gama Aviation group companies operate can be found [here](#).
- where support and functions are provided by other companies in the group, such as in relation to our website hosting and operation, IT systems and support and maintenance, marketing support, audit, governance and compliance and legal; all of which functions are performed wholly or primarily in the United Kingdom;
- to meet customer needs, where different functions operate from different locations;
- for authorisations/approvals with relevant management-level decision makers;
- for reporting purposes; and/or
- where systems are shared across different functions in different group companies; such as aircraft maintenance workflow systems in one operating company and group level accounting and billing functions.

As between companies in the Gama Aviation group, access to personal information is limited and is given on a 'need to know' basis, solely as required for job functions and roles (for example, to carry out functions in Finance department).

Where any companies in the Gama Aviation group process personal data on behalf of the company that is the original recipient (as a data processor), care is taken to ensure that they have the appropriate security standards in place to protect the data. A formal contract imposing appropriate security obligations and standards will be entered into and, if personal data is to be transferred to a Gama Aviation group company that is outside the EEA, appropriate safeguards will be put in place to ensure the security of the transferred data.

Outside the Gama Aviation Plc group of companies

On occasion, it may be necessary to ask third party service providers to carry out certain business functions on our behalf. These parties will process personal data on our behalf (as data processors). Personal data sent to these parties will be to enable them to perform their contracted functions. Prior to disclosure of personal data to third parties, we will ensure that they have appropriate security procedures and standards in place so that personal data is secure and a formal contract with them will require adherence to appropriate security standards. Third-party service providers could include IT support, back up and server hosting providers.

Sometimes, we will need to disclose personal data to independent third parties who will receive it as other controllers of the personal data received, and examples of these are:

- the providers of fraud or other checking services and/or professional advisors such as external law firms;
- in the event of any dealings with an entity in the Gama Aviation group of companies or all or part of its business, or in the event of a potential acquisition of a third party entity or its business, it may be necessary to disclose or transfer personal data to the prospective seller, buyer or other third party involved in the potential transaction (and their professional advisors); and
- it may be necessary to disclose personal data in order to comply with a legal obligation, or to enforce rights under a contract, or to protect the rights, property or safety of our employees, customers or others.

Examples of the categories of third party recipients with whom we are likely to share your personal data include:

- In relation to customers of aircraft management services or charter customers, it may be necessary to disclose personal data to providers of aircraft ground handling services, hotels, rental car companies and/or other ground transportation / travel companies, where you have asked us to arrange such services on your behalf;
- IT support, website and data hosting providers and administrators assisting with operation of the Gama Aviation Plc website, mobile apps, data rooms set up in connection with sale or acquisition transactions, document and workflow management systems and other systems and applications;
- marketing service providers;
- analytics, search engine providers and survey providers who help collate customer feedback;
- banks and payment processors in relation to payments made to or by Gama Aviation;
- third party debt recovery service providers where we need to recover sums owed;

- consultants and professional advisors, such as including legal advisors, accountants or auditors, recruitment agencies and security vetting agencies;
- courts, court-appointed persons/entities, liquidators;
- business partners and joint ventures;
- insurance brokers and/or insurers;
- governmental departments, statutory and regulatory bodies including the Information Commissioner's Office, the police and Her Majesty's Revenue and Customs and Border Forces.

Transfer of personal information

Data that is collected by a company in the Gama Aviation group may be transferred to, and stored at, a recipient situated outside the European Economic Area ("EEA"), whose staff may also process the received data at a location outside the EEA and who may work for a Gama Aviation company in the location, or for a service provider or supplier of goods. All reasonable steps will be taken to ensure that the data transferred is treated securely and in accordance with the Gama Aviation privacy policy and applicable law.

If any of the processing activities require personal data to be transferred outside the EEA, we will make that transfer only if:

- the country to which the personal data is to be transferred has laws that are to ensure an adequate level of protection for personal data;
- the recipient party or recipient country is subject to an approved certification mechanism or code of conduct with binding and enforceable commitments, that constitute 'appropriate safeguards' for personal data*
- we have put in place appropriate safeguards to protect your personal data, such as an appropriate approved form of contract with the recipient which incorporates specific provisions as directed by the European Commission;
- the transfer is necessary for one of the reasons specified in data protection legislation; or
- you explicitly consent to the transfer.

** From the end of the implementation period, data transfers from the UK to the EU/EEA as well as other countries outside of the EEA fall under the requirements of the UK GDPR, which prohibits transfers of personal data outside of the UK (and to international organisations) unless an appropriate transfer mechanism is in place, in an equivalent manner to the way in which the EU GDPR prohibits transfers of personal data outside of the EEA (and to international organisations).*

The UK continues to recognise the EEA as adequate under the UK GDPR on a transitional basis, and The EU Commission announced on 28 June 2021 that adequacy decisions for the UK have been approved.

On 10 July 2023, the European Commission adopted its adequacy decision with the United States, establishing the EU-U.S. Data Privacy Framework (**DPF**). However, the EU-U.S. adequacy decision has no direct effect on personal data transfers between the United Kingdom and the United States and at the date of publication of this Sources and Uses statement, the UK – US "Data Bridge", which is ultimately the UK's take on its own data protection framework enabling free flows of personal data between the UK and the U.S., is not yet formally adopted. Once adopted, it will be an extension to the DPF, which means that UK organisations will be able to transfer personal data to those recipients in the U.S., which have self-certified with the DPF. In the meantime, for the data to flow freely, a transfer risk assessment will still need to be carried out and an intended recipient of personal data

from Gama Aviation, who or which is located in the U.S., must be self-certified with the DPF and UK-U.S. data transfers will continue to require Gama Aviation to apply appropriate safeguards, (including the UK's current Standard Contractual Clauses as published by the UK Information Commissioner's Office) still need to be put in place before actioning the transfer,.

Personal data shared between Gama Aviation Plc group companies will be subject to the contractual obligations imposed by EU and the UK GDPR standard contract clauses to include the International Data Transfer Agreement (IDTA) that came into force in March 2022 . A copy of the current IDTA is available at <https://ico.org.uk/media/for-organisations/documents/4019538/international-data-transfer-agreement.pdf>.

If you would like to see a copy of any of the other relevant safeguards used by us to protect the transfer of your personal data, please contact dpo@gamaaviation.com.

How long we keep your personal information

Personal data will be retained throughout the period of your relationship with the Gama Aviation Plc group and, after that period ends, for as long as is necessary in connection with both our and your legal rights and obligations. Some types of personal data will therefore be retained for longer than others, but we will retain personal data for a limited period of time. The length of this period will depend on a number of factors, including:

- any laws or regulations that are required to be complied with;
- if there is a legal or other type of dispute;
- the type of information held; and
- if a customer or a regulatory authority requires us to keep personal data for a valid reason.

How we use cookies

We use cookies for certain areas of our website. Please see the Gama Aviation Cookie Policy [see <https://www.gamaaviation.com/cookie-policy/>]

Your Rights

If a Gama Aviation Plc group company uses personal data as a Data Controller and UK or European Union law applies to that use, please see the section below.

You have certain legal rights, which are summarised in the table below, in relation to any personal data held by Gama Aviation group entities about you. Your ability to exercise these rights will naturally be limited where we incidentally use limited business-related personal data in business records and business communications which we need to retain.

Where our processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent, we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

Where our processing of your personal data is necessary for our legitimate interests, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.

You can exercise these rights at any time by contacting us at dpo@gamaaviation.com.

Your right	What does it mean?	Limitations and conditions of your right
<p>Right of access</p>	<p>Subject to certain conditions, you are entitled to have access to your personal data (this is generally known as submitting a “data subject access request”).</p>	<p>Where possible, specify the type of information you would like to see, to ensure that disclosure by us is meeting expectations.</p> <p>We need to be able to verify the identity of who we are dealing with. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other individuals. Other exemptions may apply, dependent on the information and context.</p>
<p>Right to data portability</p>	<p>Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.</p>	<p>If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible, to ensure that our disclosure is meeting expectations.</p> <p>This right applies only where the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.</p>
<p>Rights in relation to inaccurate personal or incomplete data</p>	<p>You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date.</p> <p>We encourage you to notify us of any changes regarding your personal data as soon as they become apparent, including changes to your contact details.</p>	<p>This right only applies to your own personal data. When exercising this right, please be as specific as possible.</p>

Your right	What does it mean?	Limitations and conditions of your right
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased (also known as the “ <i>right to be forgotten</i> ”), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
Right to withdrawal of consent	As stated above, where our processing of your personal data is based on your specific consent, you have the right to withdraw that consent at any time.	If you withdraw your consent, this will take effect in relation to future processing only.

If any of the personal information provided to a company in the Gama Aviation Plc group changes, or you discover that something is incorrect (e.g. your contact details) please inform us without delay by contacting your local customer service representative, usual relationship manager or our Data protection Officer on dpo@gamaaviation.com.

If you have any concerns about how we process personal data, please send an email with the details of your concerns to dpo@gamaaviation.com, to enable us to try to resolve it. You are also entitled to lodge a complaint with the data protection supervisory authority in your country of residence or the country in which an alleged infringement of data protection law has occurred, e.g. with the Information Commissioner’s Office of the UK.

If a Gama Aviation Plc group company uses personal data and UK or European Union law does not apply to that use (such as where you are in the US and contract with us in the US), you may have rights that differ from the rights set out above.

California Consumers

For residents of California, [please see the Notice for California Consumers here](#).

More Information

If you want more information about any of the subjects covered in this privacy policy or if you would like to discuss any issues or concerns with us, please contact us at dpo@gamaaviation.com.

Changes to our Privacy Policy

Any changes that may be made in the future to the Gama Aviation Privacy Statement will be posted on this web page. You are advised to check back frequently, to see any updates or changes.

Third Party Websites

From time to time, the Gama Aviation Plc website may contain links to and from third party websites. If a link to any of these websites is followed, please note that these websites have their own, separate privacy policies. **In addition, please be aware that Gama Aviation does not accept any responsibility or liability for these sites or policies, and you are therefore strongly advised to check these before submitting any personal data to these websites.**

Contact

Any questions, comments and requests regarding this Privacy Statement should be addressed to dpo@gamaaviation.com.