



AUTHORISED BEECHCRAFT REPRESENTATIVE



ABSOLUTE AVIATION GROUP



AUTHORISED CESSNA REPRESENTATIVE

Protection of Personal Information Policy		
Policy #: GP_LEG1601	Effective date: 29 September 2016	Last Revision: June 2019
Policy Custodian:	Legal Department	

1. Introduction

- 1.1. The Absolute Aviation Group (herein after referred to as AAG and We) is a full spectrum aviation services group, offering customers unparalleled levels of support and expertise in the form of a boutique aviation service. AAG is committed to comply with the Protection of Personal Information ACT ('POPI') and the General Data Protection Regulation (GDPR) applicable to EU Citizens.
- 1.2. POPI and the GDPR requires AAG to inform our customers as to how their personal information is used, disclosed and destroyed.
- 1.3. AAG guarantees our commitment to protect our customers' privacy and ensuring that their personal information is used appropriately, transparently, securely and in accordance with applicable laws.
- 1.4. This policy sets out how AAG deals with our customers' personal information and for what purpose said information is used. This policy is made available on our website www.absoluteaviationgroup.co.za and by request to the information officer/legal department.

2. Collection of personal information

- 2.1. We collect and process your personal information pertaining to your aviation needs. The type of information will depend on the need for which it is collected and will be processed for that purpose only. Whenever possible, we will inform you what information you are required to provide us with and what information is optional. 'Personal Information' furthermore refers to the definition thereof contained in both POPI and GDPR. Examples of the personal information we collect includes but is not limited to:

- 2.1.1. Your name, surname, identity number and contact information;



- 2.1.2. Website usage information such as browser information, IP address, click-through tracking URL and actions taken on our website;
 - 2.1.3. Any and all company information affiliated with the customer i.e. company registration number, company addresses, company contact details and company directors;
 - 2.1.4. Any and all information in respect of Aircraft owned by you and/or your affiliated companies;
 - 2.1.5. Any other information required by us, suppliers and contractors in order to provide customers with accurate assistance in respect of their aviation needs.
- 2.2. We also collect and process your personal information for marketing purposes to ensure our products and services remain applicable to you and potential customers.
- 2.3. With the consent from you we may also supplement the information provided with information we receive from other providers in order to offer a more consistent and personalized experience in your interaction with us.
- 2.4. For purpose of this policy, customers (also referred to as you) include potential and existing customers.

3. How personal information is used

- 3.1. Your personal information will only be used for the purpose for which it was collected and agreed. This may include, but is not limited to:
- 3.1.1. Providing aviation products, services and event information to you and to carry out your requests;
 - 3.1.2. Assessing and processing various requests from you;
 - 3.1.3. Conduct credit reference search, if needed;
 - 3.1.4. Confirming, verifying and updating your details;
 - 3.1.5. For the detection and prevention of fraud, crime, money laundering or other malpractice;
 - 3.1.6. Conducting market and customer satisfaction research;



- 3.1.7. For audit and record keeping purposes;
 - 3.1.8. In connection with legal proceedings;
 - 3.1.9. Providing our services to you to carry out the services requested and to maintain and constantly improve the relationship;
 - 3.1.10. Providing communication in respect of us and regulatory matters that may affect or benefit you; and
 - 3.1.11. In connection with and to comply with legal and regulatory requirements or when it is otherwise allowed by law.
- 3.2. Section 11 of POPI prescribes that personal information may only be processed if certain conditions are met which are listed below along with supporting information for processing of personal information:
- 3.2.1. *Customers consents to the processing* – consent is obtained from you during the introductory stage of our relationship either verbally, written or tacitly;
 - 3.2.2. *The processing is necessary* – in order to deliver products and services to you, certain personal information is required. Processing is furthermore necessary to conclude a contract between the parties;
 - 3.2.3. *Processing protects a legitimate interest of the data subject* – We need to collect and process personal data in order to provide you with information regarding our required service and products. You will benefit from having their aircraft details updated and in an accessible format as a value-added service from us.

4. Disclosure of Personal Information

- 4.1. We may disclose customers' personal information to our providers whose services or products you elect to use.
- 4.2. We may also, if agreed with you, share personal information with third parties for the reasons already discussed in 2.2 and 2.3 above.



- 4.3. We may also disclose your information where we have a duty or a right to disclose in terms of applicable legislation, the law or where it may be necessary to protect our rights.

5. Legal bases for processing for EEA users:

- 5.1. If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have a legal basis for doing so under applicable EU laws. The legal basis depends on the Services you use and how you use them. This means we collect and use your information only where:

- 5.1.1. We need to provide you the services, including to operate the services, provide customer support and personalised features and to protect the safety and security of the services provided by us;
- 5.1.2. It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests.
- 5.1.3. You give us consent to do so for a specific purpose. Or
- 5.1.4. We need to process your data to comply with a legal obligation.

- 5.2. If you have consented to the use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use through, in some cases, this may mean no longer using the Services.

6. Safeguarding customers' information

- 6.1. We are committed to adequately protect the personal information we hold and to avoid unauthorised access and use of personal information. We will continuously review our security controls and processes to ensure that personal information is secure.
- 6.2. The following procedures are in place in order to protect personal information:
 - 6.2.1. The AAG's Legal Department, whose details are available below, is responsible for the encouragement of compliance with the conditions of the lawful processing of Personal Information and other provisions of applicable legislation;



- 6.2.2. This policy has been put in place throughout the AAG and training on this policy will take place;
- 6.2.3. Each employee's employment contract contains a confidentiality clause.
- 6.2.4. Our archived customer information is stored at our head office, in a secure area with limited and controlled access.
- 6.2.5. Our electronic server and database is backed up to a secure online server daily. We contract our electronic and IT safety to Jurie Erasmus at Performatec who is duly qualified to ensure the safety and security of our online and electronic systems.
- 6.2.6. Consent to process your information is obtained from you during the introductory stage of our relationship either verbally, written or tacitly.

7. Transfer of personal information internationally.

Data that we collect about you during your sign-up, and during your engagements with us are stored on servers under our control in multiple regions around the world. To facilitate our operations, we may transfer and access such information from around the world, including from other countries in which we have operations. Irrespective of which country you reside in or supply information from, by using our services you authorize us to use your information any country where we operate. We agree to abide by the standard contractual clauses for the transfer of personal data as approved by the European Commission (Art. 46 GDPR).

8. General

8.1. Blogs, Social Media, and Public Forums

We may offer blogs, social media profiles, message boards, bulletin boards or similar public forums where you and other users of our Service can post content or otherwise communicate. If you post information on a public forum, we will assume you intend to make that information public. We may use your name to identify you with a posting in a public forum and may use your post on or in connection with our Service (e.g., when using a hashtag associated with us in a tweet or status update). Any information you share in a public forum is public information and may be seen or collected by other persons, including third parties that do not adhere to the standards set forth in this Privacy Policy. We are not



responsible for events arising from the distribution of any information you choose to publicly post or share through our online services.

8.2. Third Party Analytics

We may contract the services of a third party agent to analyse statistical and aggregate data about our website content and user base. This aggregated information is not personally identifiable and is employed in improving website functionality and offerings. To this end, these third parties may employ the use of cookies and, or pixel tags in providing their services. These third party cookies are not tied to your Personal Information.

8.3. Clear Gifs and Log Files

We, and our third party partners, use technologies such as web beacons in analysing trends, administering the website, tracking users' movements around the site, and gathering demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis.

As is true of most websites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We link this automatically-collected data to other information we collect about you.

9. Access and correction of personal information.

9.1. You have the right to access the personal information we hold about you. You also have the right to ask us to update, correct or delete your personal information on reasonable grounds. Once you object to the processing of your personal information, we may no longer process said personal information. We will take all reasonable steps to confirm your identity before providing details of your personal information or making changes to your personal information.

9.2. The details of our information officer and head office are as follows:

9.2.1. Information Officer Details:

Designation: Group Legal Counsel

Telephone number: 011 548 3000

Fax Number: 011 548 3003

Postal Address: P.O. Box 1179, Lanseria, 1748



Physical Address: Hangar 1, Lanseria International Airport, Lanseria, Gauteng

Email Address: alida@absoluteaviation.co.za

9.2.2. Head Office Details:

Telephone Number: 011 346 3000

Fax Number: 011 548 3003

Postal Address: P.O. Box 1179, Lanseria, 1748

Physical Address: Hangar 1, Lanseria International Airport, Lanseria, Gauteng

Email address: reception@absoluteaviation.co.za

Website: www.absoluteaviationgroup.co.za

10. Amendments to this policy

Amendments to this policy will take place on an ad hoc basis or at least once a year. Customers are advised to check our website periodically to inform themselves of any changes. Where material changes take place, customers will be notified directly.

Approval and Ownership

Owner	Date
Legal Department	26 September 2016
Approved By	Date
Chief Executive Officer	26 September 2016

Revision History

Version	Revision Date	Description	Next review Date
V1.0	Annually		Next review: February 2018
V1.1	10 July 2018	GDPR changes incorporated	Next review: June 2019
V1.2	June 2019		June 2020



WITH YOU FOR THE JOURNEY

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