

PRIVACY POLICY



Privacy Policy Catch-a-Jet B.V.

This Privacy Policy informs you of our policies and practices for the collection, use and disclosure of information we collect about you through our services, including our platform including our mobile website and our mobile application (the "Platform").

Catch-a-Jet ("CAJ") acts as a service provider to operators of private jets in facilitating your bookings. When you book a flight through CAJ you also direct us to share your details with the operator to facilitate the booking. You should refer to an operator's privacy notice for information about the operator's privacy practices because this Privacy Policy does not govern the operator's handling of your information.

CAJ is a controller concerning the personal information we collect to create and maintain consumers' bookings and accounts on our Platform, or when we interact with consumers about CAJ's services.

1. Collection of Information

We may access, collect, and/or store the following information:

- **1.1. Information you provide to us** or our service providers through our websites, mobile applications, or otherwise includes:
 - **Contact information**, such as your name (according to your passport), telephone numbers, email address, and billing and mailing address.
 - The content you choose to upload to our websites or mobile applications, such as text and images along with the metadata associated with the files you upload.
 - **Feedback or correspondence**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us online.
 - Marketing information, such as your preferences for receiving communications about our activities, events, and publications, and details about how you engage with our communications.
 - Geolocation information, when you authorize our mobile application to access your location.
 - Payment information, such as credit or debit card details and billing address.
 - Travel information and (former) flight details based on your (previous) activities on our Platform, such as details about bookings you have made through CAJ, another flight history such as (former) departure and arrival locations and total amounts paid for each flight.

- **1.2. Information we collect from third parties.** We may collect information from third parties. We may verify this information with a service provider or combine your information with information we collect from other companies.
- **1.3. Information is collected automatically.** We, our service providers, and other third parties may automatically collect information about you, your computer or mobile device, and activity occurring on or through our websites and mobile applications. The information that may be collected automatically includes:
 - Device data, such as your device's hardware, model and screen resolution, your browser type, device identifier (e.g., Google Advertising ID or Apple ID for Advertising), your IP address, and – after your consent - general location information such as city, state or geographic area.
 - Online activity data, such as pages you viewed, how long you spent on a page, navigation paths between pages, information about your activity on a page, links you click, access times, and length of access; the website that referred you to CAJ, if applicable, and whether you opened our email and how long you had it open.
 - Location Information. If you have enabled location services on your phone and agree to the collection of your location when prompted in the CAJ mobile application, CAJ will collect your location information when you use the mobile applications to show you "nearby flights"; If you do not want CAJ to collect this information, you may decline the collection of your location when prompted, or adjust the location services settings on your device. In that case, we are not able to show you "nearby flights".

1.4. Cookies and other tracking technologies

For information about our use of cookies, please see our Cookie Policy.

2. Legal purposes for the use of the information we collect

We use your personal information for the purposes as described below and only as permitted by law. Our legal bases for processing the personal information described in this Privacy Policy are described below.

 To facilitate your booking, including to collect your name, payment card information and other details and provide this information to the operator or operator's service provider.

We provide this information as a processor and based on our agreement with the operator and with you.

- To operate our websites and mobile applications, including:
 - o make bookings and communicate with you about your bookings
 - o provide services and customer support you request
 - o resolve disputes and troubleshoot problems

Such processing is necessary to perform the contract you have signed governing our provision of services or to take steps that you request before signing up for our services.

If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the services you access and request.

• To communicate with you, including to:

- o inform you about our services, updates, and promotional offers based on your communication preferences
- send you announcements, updates, security alerts, and support and administrative messages
- o respond to your requests, questions and feedback
- send you CAJ marketing newsletters as permitted by law. You will have the ability to opt-out of or decrease the volume of our marketing and promotional communications
- o show you "Nearby departing flights". This functionality only works if you have enabled location services on your phone and agree to the collection of your location when prompted in the CAJ mobile application.

These activities constitute our legitimate interests. We do not use your personal information for these 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).

• For compliance, fraud prevention, and safety, including to:

- o prevent potentially prohibited or illegal activities such as negligence, breach of contract, or fraud, and enforce our terms and conditions and other policies
- o audit compliance with our policies and contractual obligations
- o protect our, your or others' rights, privacy, safety, or property (including by making and defending legal claims)
- enforce the terms and conditions that govern our websites and mobile applications
- o protect, investigate and deter against fraudulent, harmful, unauthorized, unethical, or illegal activity

• For research and development. We analyze the use of our platform, websites and mobile applications to analyze, improve our websites and mobile applications, and to develop new products and services, including by studying user demographics and use of our websites and mobile applications.

These activities constitute our legitimate interests. We do not use your personal information for these 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).

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• **To comply with the law.** We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal processes, such as to respond to subpoenas or requests from government authorities.

Processing is necessary to comply with our legal obligations.

• With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

3. How We Share Your Information

We do not share your personal information with third parties without your consent, except in the following circumstances or as described in this Privacy Policy:

- **Affiliates**. We may share your personal information with our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.
- Operators. We may share your personal information with the operators where you make bookings through CAJ (or the operators' service providers), only as we deem necessary to facilitate the bookings; the operators' privacy notices and privacy policies govern their handling of your information; our Privacy Policy does not govern the operators' privacy practices.
- **Service Providers.** We may employ third-party service providers to perform services on our behalfs such as credit card processors, marketing or research providers, web hosting and email service providers, and other data processors.
- **Professional advisors**. We may disclose your personal information to professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- For compliance, fraud prevention and safety. We may share your personal information for the compliance, fraud prevention and safety purposes described above.

 Business transfers. We may disclose or transfer your personal information in connection with or during the negotiation of financing, merger, acquisition, dissolution, or similar corporate event, or the sale of all or some of CAJ's assets, the information that CAJ has collected, including personal information that may be transferred as a business asset.

4. Protection of personal information

The security of your personal information is important to us. We employ several organizational, technical and physical safeguards designed to protect the personal information we collect.

5. Retention of data

We retain personal information for as long as necessary to fulfill the purposes for which we collected it, including to satisfy any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We do not retain any personal data that we share with the operators on our Platform. However, we de do retain all (previous) travel information and (former) flight details (as described under 1.1.) on our Platform.

6. Your rights

European data protection laws give you certain rights regarding your personal information. If you are located within Europe, you may ask us to take the following actions about the personal information that we hold:

- Access. Provide you with information about our processing of your personal information and give you access to your personal information.
- Correct. Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to privacy@catch-a-jet.com or our postal address provided above. We may request specific information from you to help us

confirm your identity and process your request. Applicable law may require or permit us to decline or limit your request.

If we decline your request, we will tell you why subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in the Netherlands, the Autoriteit Persoonsgegevens (https://autoriteitpersoonsgegevens.nl).

7. Changes To This Privacy Policy

We may amend this Privacy Policy at any time by posting the amended terms on our Platform. In addition, we will notify you of material changes with an alert on the Platform or a communication to you via email (at the e-mail address provided by you) before the change becomes effective.

8. Contact Information

Should you have any questions or concerns regarding this policy, please contact us at chris@catch-a-jet.com or the following address:

Catch-a-Jet B.V. Veldkampweg 6 8162 PV Epe The Netherlands

Address

Catch-a-Jet BV Veldkampweg 6 8162 PV Epe The Netherlands Contact

+31 6 12 04 75 04 info@catch-a-jet.com www.catch-a-jet.com **Business Details**

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