Background

Matrix International understands and agrees that your privacy is important to you and that you care about how your information is used and shared online. We respect and value the privacy of everyone who visits Our Site and will only collect and use information in ways that are useful to you and in a manner consistent with your rights and our obligations under the law.

This Policy applies to our use of any and all data collected by us in relation to your use of our site. Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our site. If you do not accept and agree with this Privacy Policy, you must stop using our site immediately. This policy is effective August 5, 2020.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain areas and features of Our Site;

"Cookie" means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 12, below;

"Our Site" means the following website:

Matrix-usa.us

"We/Us/Our" means Matrix International Business Consulting LLC, limited liability company incorporated in the state of Florida, United States of America, with a registered address at 759 SW Federal Hwy. Suite 304, Stuart, FL, United States.

2. Information About Us

- 1. Our Site, www.Matrix-usa.us, represents Matrix International Business Consulting LLC, limited liability company incorporated in the state of Florida, United States of America, , with a registered address at 759 SW Federal Hwy. Suite 304, Stuart, FL 34994, United States
- 2. We can be contacted at info@Matrix-usa.us

3. Scope – What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. It does not extend to any external websites that are linked to from Our Site (whether We provide those links or whether they are shared by other users). We have no control over how your data is collected, stored or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. What Data Do We Collect?

Some data will be collected automatically by Our Site (see our Cookie Policy in section 12), other data will only be collected if you voluntarily submit it and consent to us using it for the purposes set out in section 5, for example, when requesting a quote or when

requesting information. Depending upon your use of Our Site, We may collect some or all of the following data:

- 1. Client contact information such as Name, address, email addresses, and telephone numbers (collected for each lead).
- 2. Client passenger information such as name, date of birth, place of birth, citizenship, residence, passport numbers (collected only when clients have booked a flight).
- 3. Client financial information such as credit / debit cards, ID, Passport, bank accounts (collected only when clients have booked a flight).
- 4. IP address (automatically collected);
- 5. Web browser type and version (automatically collected);
- 6. Operating system (automatically collected);
- 7. A list of URLs starting with a referring site, your activity on Our Site, and the site you exit to (automatically collected);

5. How Do We Use Your Data?

- 1. All personal data is stored securely in accordance with the EU General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR). For more details on security see section 6, below.
- 2. We use your data to provide the best possible journey planning services to you. If you request a quote or service from us, we request certain personally identifiable information from you on our quote form. You must provide contact information such as name, email, and phone number. The information you enter on our quoting system is stored by us. We use this information for quoting, selling and to contact you via phone and/or email to communicate your service requests and process your trip details or other services you request. More specifically, we use your data for the following purposes:
- 1. Responding to client requests for trip services.
- 2. Responding to client requests for leasing or aircraft sales.
- 3. Providing a contractual agreement for trip services and/or leasing and/or aircraft sales.
- 4. Communicating special offers and updates such as charter and empty leg specials.
- 5. Supplying you with emails that you consent to receiving e.g. newsletters, alerts, marketing promotions and market research, etc. You may unsubscribe or opt-out at any time by clicking on the Unsubscribe link on these emails or by contacting us at info@Matrix-usa.us.
- 6. Communicating service-related announcements such as notices by email of temporary suspension of service due to web site maintenance.
- 7. Providing customer service in response to your requests for service.
- 8. Personalizing and tailoring your experience on Our Site.
- 9. Personalizing and tailoring Our products and services for you.
- 10. Analyzing your use of Our Site, and gathering feedback, to enable us to continually improve our site and your user experience.
- 3. In some cases, the collection of data may be a statutory or contractual requirement, and we will be limited in the services we can provide you without your consent for us to be able to use such data.

- 4. With your permission and/or where permitted by law, we may also use your data for marketing purposes which may include contacting you by email and/or telephone and/or text message and/or post with information, news and offers on our products and/or services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.
- 5. Advertisers whose content appears on Our Site may engage in what is known as "behavioral advertising" advertising which is tailored to your preferences, based on your activity. Your activity is monitored using Cookies, as detailed below in section 12. You can control and limit your data used in this way by adjusting your web browser's privacy settings. Please note that we do not control the activities of such advertisers, nor the information they collect and use. Limiting the use of your data in this way will not remove the advertising, but it will make it less relevant to your interests and activities on Our Site.
- 6. If you are providing personal data to us about someone else, that you confirm that they have appointed you to act for them to consent to the processing of their personal data, and that you have informed them of our identity, of this Policy, and of the purposes (as set out in this Policy) for which their personal data will be processed.
- 7. We may monitor or record telephone conversations to enhance your security and ours, to enable us to handle complaints efficiently, improve our client service and for staff training purposes. If your telephone conservation with us will be recorded then you will receive a message to this effect prior to the start of your conservation with us.

 8. Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following basis applies:
- a) You have given consent to the processing of your personal data for one or more specific purposes;
- b) Processing is necessary for the performance of a contract to which you are a party or in order to take steps at the request of you prior to entering into a contract;
- c) Processing is necessary for compliance with a legal obligation to which we are subject;
- d) Processing is necessary to protect the vital interests of you or of another natural person;
- e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
- f) Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data. In particular where the data subject is a child, we will only provide the child's data when regulated by law or by parental/guardian consent; e.g. passenger data for flights, customs, etc.

6. How and Where Do We Store Your Data?

1. We keep your data in order to use it as described above in section 5, and presently we store your data indefinitely. If requested, we will delete your data from our databases

and unsubscribe you from our marketing emails and newsletters. In any event, we will conduct an annual review to ascertain whether we need to keep your data. Your date will be deleted if we do not have any contact or communication with you after 24 months.

- 2. We store information that we collect through cookies and log files to create a profile of your service preferences to enhance your user experience on our website and store your data, so you do not need to re-enter data each time you enter our web site or request new services. We store your data permanently for accounting, legal and regulatory requirements. Our user data is stored in the United States.
- 3. Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through Our Site.
- 4. Notwithstanding the security measures that We take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting data to Us via the internet.

7. Do We Share Your Data?

- 1. We do not sell or provide your profile and data with third party advertising and marketing entities.
- 2. We may contract with third parties to supply products and services to you. These may include payment processing, provision of services, search engine facilities, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law. These third parties are prohibited from using your personal data for any other purposes. We may disclose your personal data (and any third party personal data provided by you to us) to:
- We use a bulk email transmission service and share email addresses with them to process newsletters, transactional, and marketing emails to our clients.
- We use online storage services to store documents, client data, as well as backups.
- We use a telephone service entity to validate phone numbers.
- We use an email validation service to verify validity of email addresses.
- We provide passenger information as required by regulatory requirements to Aircraft Operators.
- We provide client data only to the extent required to arrange services in most cases this is only the name and phone number.
- We use credit card to process client credit card payments.
- We use third-party customer review services to reach out to clients for feedback on our services.
- We use an electronic signature service to process client contracts via electronic devices.
- We use and provide data to Accounting software services to maintain and report accounting records and client transactions.
- We use banking services to process client incoming and outgoing bank wire transactions.

- 3. We may compile statistics about the use of our site including data on traffic, usage patterns, user numbers, and other information. All such data will be anonymized and will not include any personally identifying information. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.
- 4. In certain circumstances we may be legally required to share certain data held by us, which may include your personal information, for example, where we are involved in legal proceedings, where we are complying with the requirements of legislation, a court order, or a governmental authority. We do not require any further consent from you in order to share your data in such circumstances and will comply as required with any legally binding request that is made of us.

8. What Happens If Our Business Changes Hands?

- 1. We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Data provided by users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the data for the purposes for which it was originally collected by Us.
- 2. In the event that any of your data is to be transferred in such a manner, you will be contacted and informed of the changes. The new owner or controller will contact you with regards to having your data stored or deleted with your consent.

9. How Can You Control Your Data?

- 1. When you submit information via Our Site, you may be given options to restrict our use of your data and/or provide consent to use your data. We aim to give you strong controls on our use of your data (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails, declining consent at the point of providing your details, and/or by sending your data modification/deletion requests to info@Matrix-usa.us
- 2. You may also wish to sign up to one or more of the preference services operating in your country. These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. Your Right to Withhold Information and Your Right to Withdraw Information After You Have Given it.

- 1. You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 2. You may restrict your internet browser's use of Cookies. For more information, see section 12.
- 3. You may withdraw your consent for Us to use your personal data as set out in section 5 at any time by contacting us using the details set out in section 15, and We will delete Your data from Our systems. However, you acknowledge this may limit Our ability to

provide the best possible products and services to you.

11. How Can You Access Your Data?

You have the legal right to ask for a copy of any of your personal data held by Us (where such data is held). Please contact us for more details at info@Matrix-usa.us or using the contact details below in section 14.

12. Cookies

Our Site may place and access certain first party Cookies on your computer or device. For more details, please refer to our cookie policy.

13. Summary of Your Rights under GDPR

Under the GDPR, you have:

- 1. The right to request access to, deletion of or correction of, your personal data held by Us;
- 2. The right to complain to a supervisory authority;
- 3. Be informed of what data processing is taking place;
- 4. The right to restrict processing;
- 5. the right to data portability;
- 6. Object to processing of your personal data;
- 7. rights with respect to automated decision-making and profiling (see section 14 below).

To enforce any of the foregoing rights or if you have any other questions about Our Site or this Privacy Policy, please contact Us using the details set out in section 15 below.

14. Automated Decision-Making and Profiling

We do not carry out any automated decision-making or profiling at present.

15. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by:

- Email: info@Matrix-usa.us
- Traditional mail: 759 SW Federal Hwy. Suite 304, Stuart, FL 34994.

Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you (as under section 11, above).

16. Changes to Our Privacy Policy

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.