

# Privacy Policy

**This Privacy Policy was last updated on 13 November 2023**

## WHO ARE WE AND HOW YOU CAN CONTACT US

**Contact details of the Data Controller: Storm Aviation Limited**, company number 05229468 registered address office address 80 Cheapside, London, England, EC2V 6EE and its subsidiaries and their respective own subsidiaries (hereinafter “We”, “Ours”, “Company”) process the personal data of its’ **customers, potential customer, employees, candidates to employees, suppliers, partners etc.** (hereinafter - you, your) personal data in accordance with the provisions of the legal acts regulating the legal protection of personal data and applying the highest technical and legal standards of protection and taking all necessary measures to prevent possible breaches of personal data protection. This Privacy Policy (hereinafter referred to as the "**Privacy Policy**") sets out the basic rules for the collection, processing and storage of your personal data and other information related to you, the scope, purposes, sources, recipients of your personal data and your rights as a personal data subject and other important aspects of your use of the Company’s services. This information is important, so we hope you will read it carefully.

As used in this Privacy Policy, the term “personal data” (the “**Personal Data**”) means any information about you relating to you as a natural person, a data subject whose identity is known or can be directly or indirectly identified through the use of certain data (e.g. name, surname, personal identification number, address, telephone number, etc.).

In processing the personal data, we responsibly comply with the Data Protection Legislation (that means all applicable legislation in force from time to time in the United Kingdom applicable to data protection and privacy including, but not limited to, the UK GDPR (the retained EU law version of the General Data Protection Regulation ((EU) 2016/679), as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018); the Data Protection Act 2018 (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003 as amended) (hereinafter collectively "the **GDPR**") and other directly applicable legal acts regulating the protection of personal data, as well as instructions from competent authorities.

In the event that you provide us with personal information other than your own (for example, identifying another person as a beneficiary), please inform them of this Privacy Policy and its contents.

If the user of the services is a legal entity, this Privacy Policy applies to natural persons whose personal data is transferred to us by a legal entity. The user must duly comply with Art. 14 of the GDPR. to inform data subjects (managers, beneficiaries, representatives, etc.) about the transfer of their personal data to the Company.

If you have any questions regarding this Privacy Policy or requests regarding the processing of your personal data, please contact us by email: [gdpr@stormaviation.com](mailto:gdpr@stormaviation.com).

By visiting the Company's websites and / or using the information contained therein and / or our services, you acknowledge and confirm that you have read and understood this Privacy Policy.

## TO WHOM THE PRIVACY POLICY APPLIES

This Privacy Policy applies to all our Websites <https://stormaviation.com/> (the **Websites**) and any service provided by the Company or other activities of the Company where personal data is being process.

The terms and conditions of the Privacy Policy apply to you every time you access the content and/or the service we provide, regardless of which device (computer, cell phone, tablet, TV, etc.) you are using.

This Privacy Policy does not apply to links to other entities websites provided on our websites; therefore, we recommend that you read the personal data processing rules applied on such websites.

## WHAT PRINCIPLES DO WE COMPLY TO?

When processing your personal data, we:

- comply with current and applicable legislation, including the GDPR;
- we will process your personal data in a lawful, fair and transparent manner;
- we will collect your personal data for specified, clearly defined and legitimate purposes and will not continue to process it in a way incompatible with those purposes, except to the extent permitted by law;
- take all reasonable steps to ensure that personal data which are inaccurate or incomplete, having regard to the purposes for which they are processed, are rectified, supplemented, suspended or destroyed without delay;
- we will keep them in such a form that your identity can be established for no longer than is necessary for the purposes for which the personal data are processed;
- we will not disclose or disclose personal data to third parties except as provided in the Privacy Policy or applicable law;
- ensure that your personal data is processed in such a way as to ensure the appropriate security of personal data through appropriate technical or organizational measures, including protection against unauthorized or unlawful processing of personal data and against unintentional loss, destruction or damage. Please contact us at [gdpr@stormaviation.com](mailto:gdpr@stormaviation.com).

## WHAT PERSONAL DATA, FOR WHAT PURPOSE AND BASIS DO WE PROCESS

The purpose of the processing of personal data. Why we process personal data?	The categories of processed personal data. What kind of categories of personal data we process?	On what legal basis do we process personal data?
Administration of our website	When you visit our website, data about your browsing on the Website is collected using cookies. We use necessary / technical cookies to ensure the proper functioning of the Website and / or other third-party cookies to improve your browsing experience (i.e., to consider your needs, to continuously improve the website and to make offers that suit your interests).	Data using cookies and similar technologies related to Internet browsing, etc. are collected (processed) in accordance with Article 6 Part 1. a) of the GDPR, i.e., with your consent (except for necessary cookies).

<p>Responding to your general enquiries or requests of information</p>	<p>Our website or other public business channels provide com contacts where you can contact us to consult us on issues that concern you. We will accept, review, and respond to all your messages. If you contact us by e-mail, regular mail, or phone, we may process the following personal data of yours: name, surname, e-mail, postal address, and the text of the correspondence and / or attached documents. This data will be processed for the administration of your enquiry. Please note that we may need to contact you to provide with a reply to your enquiry so be sure to share accurate contact data of yours.</p>	<p>All personal data you provide when communicating with us is used only for the purposes of reviewing, and responding messages, administering (managing) communication flows and providing you with a response. We will process the said personal data in accordance with Article 6 Part 1. a) of the GDPR, i.e., with your consent, which you express by contacting us by e-mail, mail, or phone.</p>
<p>Drawing up and executing contracts for the purchase and sale of services</p>	<p>We may process name, surname, contact information, position in the company you represent, signature, other information required for negotiations, concluding, and performing of contracts.</p>	<p>We will process in accordance with Article 6 Part 1. b) of the GDPR, i. e. to conclude a contract with you and perform it, as well as Article 6 Part 1. c) of the GDPR., i.e., we are subject to a legal obligation to keep contracts and accounting documents and Article 6 Part 1. f) of the GDPR, i.e., our legitimate interest in asserting and / or defending our legal claims (where applicable).</p>

<p>Selling you courses</p>	<p>If you decide to purchase our courses, we will ask you to provide us with your personal details. Such Personal Data includes the buyer's name, surname, email, residence country and payment details that we must collect in order to enter into a contract with you and sell you courses. We will use this information to manage and administer the purchasing process (your subscription plan and virtual credits) and our relationship with you, for example by contacting you by email / phone and notifying you about upcoming courses. Your name, surname, bank account details (when paying via wire transfer), country of residence (when applying value added tax) are processed for this purpose.</p> <p>We process:</p> <ol style="list-style-type: none"> <li>1. Your name, surname, bank account details (when paying via wire transfer);</li> <li>2. Your name, surname, last 4 digits of your Credit Card, expiry date, type of Your Credit Card, location email, IP address address, (when you pay with Credit Card);</li> <li>3. Additionally your country of residence (when applying value added tax).</li> </ol>	<p>We will process this Personal Data of yours in accordance with Article 6 Part 1. b) of the GDPR, i. e. to conclude a contract with you and perform it, as well as Article 6 Part 1. c) of the GDPR., i. e. we are subject to a legal obligation to keep contracts and accounting documents and Article 6 Part 1. f) of the GDPR, i. e. our legitimate interest in asserting and / or defending our legal claims (where applicable).</p>
<p>Legal duty to ensure adherence to KYC procedures</p>	<p>We process the following personal data: full names, date of births, other identification details (citizenship, copies of passport/ ID, proof of living address, bank information, contact details, source of wealth/ funds) of the members of the Board of Directors, directors and secretaries (e.g., CEO, COO, CFO, Deputies, Heads of departments), persons assigned to represent the Party, shareholders with more than 25 % ownership and ultimate beneficial owners.</p>	<p>Personal Data for Client Verification and Onboarding Procedure is processed in accordance with Article 6 Part 1. f) of the GDPR, i. e. our legitimate interest to fulfil the requirements for money laundering and financing terrorism prevention, prevention of corruption, bribery and fraud, international, US, UK sanctions (restrictions), to verify</p>

		the liability of the parties
Selection of candidates for employees (recruiting)	We process name, surname, e-mail address, telephone number, education, additional qualifications, work experience and other information voluntary provided by the candidate.	Collection and use of data are based on your consent Article 6 Part 1. a) of the GDPR
Providing you with news, promotions and information (direct marketing)	If you agree to subscribe or otherwise receive our newsletter, we will use your email address for general and / or individual marketing (e.g. about goods, services, discounts, offers, competitions, events, news, surveys and other news) and we will contact you for these purposes. The information collected will only be used for direct marketing. When submitting joint marketing offers, you will be sent general information that we will share with all our customers.	Personal Data for direct marketing is processed in accordance with Article 6 Part 1. a) of the GDPR, i. e. with your consent or Article 6 Part 1. f) of the GDPR, i. e. our legitimate interest to offer you a similar goods/services to ones you have purchased from us and to get your feedback about purchased goods/services.

If you do not provide personal data, the provision of which to the Company is necessary to ensure compliance with the requirements of legal acts and / or the conclusion and / or performance of the contract, we will not be able to provide you with services or conclude another transaction.

## **DIRECT MARKETING**

For direct marketing purpose, we process your personal data in the following cases:

- when we obtain your explicit consent to such processing;

- when you are a customer of us who have not objected to the processing of personal data for the purpose of direct marketing, marketing of similar services or products.

For direct marketing purpose, we process your Personal Data which is described in part “WHAT PERSONAL DATA, FOR WHAT PURPOSE AND BASIS DO WE PROCESS” of this Privacy Policy.

With you expressed consent to receive direct marketing messages or newsletters you subscribe, you agree to receive our news about new services, products, invitations to events etc.

We inform you that Visitors may at any time refuse our newsletters or other promotional messages by clicking on a link to this in our outgoing newsletters and/or messages.

## **HOW WE PROCESS YOUR PERSONAL DATA**

Our use of your personal data will always have a lawful basis. Most commonly, we use your personal data:

- Where we need to conclude any contract and/or perform any contract we have entered into with you (for example, to comply with the Terms and Conditions which you agree with when you create your account on our Website and start using our services and/ or to comply with our contract to provide services to you, your academic institution, your employer, or other organization that may be providing you with access to our services);
- Where we need to comply with a legal obligation (for example, when performing accounting, archiving, data breach notification processes);
- Where we have your consent (for example, in cases when you agree to receive our newsletters);
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interest. “Legitimate interest” means our interest to enhance our services, products, to manage the processes of businesses and activities. We consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. The legitimate interests that we pursue include:
  - provision of marketing offers of our similar services or products;
  - presentation of our services on social networks, submission of answers to your queries or messages on social networks, analysis of our accessibility on social networks;
  - provision of information to your request, responds to your queries;
  - establishment, exercise or defence of legal claims;
  - analysis, expansion and improvement of our services, customer service quality assurance and compilation of statistics and analysis related with it;
  - protection of information related to the provision of our services, improvement, development and maintenance of the security of IT systems.

## **HOW LONG WE WILL RETAIN YOUR PERSONAL DATA**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

By law, in the United Kingdom, we have to keep basic information about our clients (including contact, identity, financial and transaction data) for at least six years after they cease being clients for tax purposes. Different laws in the countries in which our companies operate may have shorter or longer retention periods.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will retain and securely destroy your personal information in accordance with applicable laws and regulations.

## HOW DO WE PROTECT YOUR DATA?

We responsibly implement appropriate organisational and technical personal data security measures intended for the protection of personal data against accidental or unlawful destruction, alteration and disclosure as well as against any other unlawful processing. **The security measures we implement include the protection of personnel, information, IT infrastructure, internal and public networks as well as office buildings and technical equipment.**

In the event of personal data breach of security that could seriously jeopardise your rights or freedoms and determine the circumstances with which unauthorised access to personal data has been obtained, we will immediately inform you about it.

## TO WHOM IS YOUR DATA ARE DISCLOSED

We may share some of your personal data with the following categories of third parties:

- any Avia Solutions Group<sup>1</sup> company (listed at <https://aviasg.com/en/the-group/general-contacts>) for the purposes set out in this Privacy Policy (for example, for the purposes of performance of contracts and the management of relationship with customer);
- representatives acting on our behalf with respect to the promotion of our services in particular territories;
- companies providing data centers, hosting, cloud, site administration and related services, software developers, providing, maintaining and developing companies, companies providing information technology infrastructure services, companies providing communication services;
- credit and debit card companies used to facilitate payment transactions related to the provision of our services, banks and other credit and/or payment companies;
- our professional advisors, auditors, lawyers and/or financial advisers;
- our other service providers (data processors) or our subcontractors;
- notaries, if the contract concluded with you requires a notarial form;
- judicial officers, entities providing legal s and/or debt recoveries services, subrogator of claim right;
- companies providing advertising and marketing services;
- companies providing archiving, physical and / or electronic security, asset management and/or other business services;
- in accordance with the laws to state institutions, establishments, etc.;
- law enforcement authorities at their request or on our own initiative if there is a suspicion that a criminal offense has been committed, as well as courts and other dispute resolution bodies; tax administrators
- in the event of a company restructuring, transfer / acquisition and / or business transfer / acquisition, to a third party acquiring the business and processing personal data for the same purposes as specified in this Privacy Policy and/or doing the Due Diligence by our and/or their legal and/or financial advisors, etc.

## DATA TRANSFER OUTSIDE THE EUROPEAN ECONOMIC AREA

As a general rule, your personal data will be processed in the countries of the European Economic Area (hereinafter - EEA). However, in certain cases, your personal data may be transferred to non-EEA countries. Please note that in non-

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<sup>1</sup> AVIA SOLUTIONS GROUP PLC, a private limited liability company, established and acting under the laws of Ireland, registration code 727348.

EEA states, personal data may be subject to less protection than within the EEA, but we carefully evaluate the conditions under which such data will be processed and stored after being transferred to the above-mentioned entities.

Please note that if the European Commission has determined that the third country, territory or one or more specified sectors in that third country or international organization concerned provides an adequate level of personal data protection, the transfer must take place in the same manner as in the EEA. Please be informed that you can have access to the information as to the states in respect of which the decision of the European Commission has been taken, here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).

In other cases, we take all necessary measures to ensure that your personal data is transferred to the recipient safely processing the data. The tools we use: a contract with a non-European recipient of personal data includes specific clauses for the secure processing of the data. In certain cases, we ask for your consent to transfer your data outside the United Kingdom or the EEA.

## **DO WE APPLY AUTOMATED DECISION-MAKING OR PROFILING?**

We do not normally use automated decision-making under Article 22 of the GDPR to initiate and execute contractual relationships. Should we apply this procedure in individual cases, we will inform you separately, if required by law.

We process your personal data in a partially automated way in order to assess certain personal aspects (hereinafter - **Profiling**). We use profiling, for example, when we are required by law to prevent money laundering or manage financial risk.

## **RIGHTS GUARANTEED TO YOU**

We guarantee the implementation of these rights and the provision of any related information at your request or in case of your query:

- know (be informed) about the processing of your personal data;
- to get access to your personal data which are processed by the Data Controller;
- request correction or addition, adjustment of your inaccurate, incomplete personal data;
- require the destruction of personal data when they are no longer necessary for the purposes for which they were collected;
- request the destruction of personal data if they are processed illegally or when you withdraw your consent to the processing of personal data or do not give such consent, when is necessary;
- disagree with the processing of personal data or withdraw the previously agreed consent;
- request to provide, if technically possible, the provision of your personal data in an easily readable format according to your consent or for the purpose of performing the contract, or request the transfer of data to another data controller.

In order to exercise your rights, please send us the request by e-mail [gdpr@stormaviation.com](mailto:gdpr@stormaviation.com) or directly writing to the Company by address 80 Cheapside, London, England, EC2V 6EE.

Upon receipt of your request, we may ask you to provide proof of your identity or other identifying information to ensure that we are exercising your rights as a data subject and to prevent unauthorized disclosure of personal data or information to others who are not entitled to it. If we are unable to identify you, we will not be able to exercise your rights as a data subject.

We provide information about the processing of your personal data free of charge. If your request is unfounded, repetitive or disproportionate, we may charge a fee commensurate with our administrative costs.



Upon receipt of your request, we will respond to you within 30 calendar days of receipt of your claim and the due date for submission of all documents necessary to prepare the answer.

In exceptional circumstances, which may require us to have additional time, the deadline for replying may be extended for a further two months, depending on the complexity of the situation. In this case, it is mandatory to inform the Data Subject in writing about such extension within 1 (one) month from the receipt of the request and indicate the reasons for the delay. If we think we need to, we will stop the processing your personal data, except for storage, until your application is resolved. If you have legally waived your consent, we will immediately terminate the processing of your personal data and within no more than 30 calendar days, except in the cases provided for in this Privacy Policy and in the cases provided for by law when further processing of your personal data is binding on us by the legislation in force, the legal obligations we are facing, court judgements or binding instructions from the authorities. The response will be provided in the same way as your request was received.

By refusing to comply with your requirement, we will clearly indicate the grounds for such refusal.

If you disagree with our actions or the response to your request, you can complain to the competent state authority (the ICO in the United Kingdom. The list of supervisory authorities by each EU countries: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)). In all cases, we recommend that you contact us before making a formal complaint so that we can find the right solution.

## **WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?**

We may, from time to time, expand or reduce the scope of our business operations and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this notice, be permitted to use that data only for the same purposes for which it was originally collected by us.

## **LINKS TO OTHER WEBSITES**

Our Websites may contain links to other websites, which are not operated by us. We have no control over how your data is collected, stored, or used by such other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## **SOCIAL NETWORKS**

When you visit social networks, your personal data is processed by a specific social network, and we start processing your Personal Data when you visit us on social networks. Through various social media channels, we want to introduce you to our wide range of services / products and exchange ideas and opinions with you on important topics.

Your personal data provided on the social network is processed for the following purposes:

- communicate with our social network visitors;
- respond to visitor inquiries;
- obtaining statistical information;
- conducting customer surveys, marketing campaigns, market analysis, lotteries, competitions or similar actions or events;
- if necessary, defending the legitimate interests of the Company in institutions and in other cases.

Unless explicitly stated otherwise, the legal basis for data processing is Article 6 part 1 point (f) of the GDPR. Our legitimate interests are to be able to answer your messages or questions and analyse our availability on social networks, to present our

products and services. To the extent that you wish to enter into a contractual relationship with us with your request, the legal basis for such processing is Article 6 part 1 point (b) of the GDPR.

If we intend to process your personal data for any other purpose not mentioned above, we will notify you prior to such processing.

Our pages on social networks are managed by specific social networks, so when you visit them, the processing of personal data is based on the social network privacy policies. With some social networks, depending on the social network policy, the purposes and scope of the processing, we are considered as joint data controllers.

Name of the social network and its Privacy Policy	Personal Data we process	Personal Data we process as joint data controllers
<p><b>Facebook</b> You can read their privacy policy by clicking here: <a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a></p>	<p>Your Facebook username, when you comment, react to the publication, share posts, write us messages;</p> <p>Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.</p>	<p>We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from Facebook through their service. The data controllers' agreement can be found here: <a href="https://www.facebook.com/legal/terms/page_controller_addendum">https://www.facebook.com/legal/terms/page_controller_addendum</a></p>
<p><b>Instagram</b> You can read their privacy policy by clicking here: <a href="https://help.instagram.com/519522125107875/?helpref=uf_s_hare">https://help.instagram.com/519522125107875/?helpref=uf_s_hare</a></p>	<p>Your Instagram username, when you comment, react to the publication, share posts, share content in stories section, write us messages;</p> <p>Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.</p>	<p>We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from Instagram through their service. The data controllers' agreement can be found here: <a href="https://help.instagram.com/494561080557017/?helpref=hc_fnav">https://help.instagram.com/494561080557017/?helpref=hc_fnav</a></p>
<p><b>LinkedIn</b> You can read their privacy policy by clicking here: <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a></p>	<p>Your LinkedIn username, when you comment, react to the publication, share posts, write us messages;</p> <p>Your location indicated on the personal account.</p> <p>Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more</p>	<p>We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from LinkedIn through their service. The data controllers' agreement can be found here: <a href="https://www.linkedin.com/legal/l/dpa">https://www.linkedin.com/legal/l/dpa</a></p>
<p><b>Twitter</b> You can read their privacy policy by clicking here: <a href="https://twitter.com/en/privacy">https://twitter.com/en/privacy</a></p>	<p>Your Twitter username, when you tweet, retweet (share) the tweet, quote, mention, write us messages;</p> <p>Your activities on our site, e.g. Your page views, duration statistics, query, comment information, and more.</p>	<p>We use statistical information (visits to our website, range of contributions, visits and average video transmission times, information about the countries and cities from which our visitors come, age range, gender). We receive anonymous statistics from Twitter through their service. The data controllers' agreement can be found here: <a href="https://gdpr.twitter.com/en/controller-to-controller-transfers.html">https://gdpr.twitter.com/en/controller-to-controller-transfers.html</a></p>

## **CHANGES TO OUR PRIVACY POLICY**

We reserve a right to change this Privacy Policy unilaterally from time to time (for example, if the law changes). Any changes will be immediately posted on our websites. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy applies from the date it is posted on the Websites. Last review of the Privacy Policy: 13/11/2023. If you continue to use our services (such as the Website) after changing the terms of the Privacy Policy, you will be deemed to have read and understood the changed terms of the Privacy Policy.