



# **PRIVACY & DATA POLICY**

**AVANTEFLY LLC**



## AVANTEFLY PRIVACY AND DATA POLICY

### ABOUT THIS POLICY

- This Privacy and Data Policy, along with our Terms & Conditions, explains how we collect and handle your information across all of our websites, mobile apps and other services.
- Your privacy is important to us and we are committed to doing everything we can to protect any personal data that you give to us.
- If you have any questions about what we do with your personal data please contact us: [privacy@avantefly.com](mailto:privacy@avantefly.com). “Personal data means information relating to you as an identifiable individual. For example your name or contact details, as well as information that may not on its own identify you, but which we store alongside such identifiers, such as how you are using our services or the country you are in when you do so.
- In this Privacy Policy our “Website” refer to the website at [www.avantefly.com](http://www.avantefly.com), to “we”, “us” and “our” refer to AvanteFly Limited; and to “you” and “your” are to you, the user.
- From time to time we will update this Policy. We will make every appropriate effort to communicate any changes to the privacy policy to you.

### CONTROLLER & DATA PROTECTION OFFICER

- The Controller of your personal data is AvanteFly LLC. You can contact our Data Protection Officer by emailing [privacy@avantefly.com](mailto:privacy@avantefly.com).

### WHAT PERSONAL DATA DO WE COLLECT?

We only use your information where you’ve given us your consent, where it’s necessary to deliver the services you’ve requested, where it’s necessary to exercise or comply with legal rights or obligations, or for normal business purposes of the kind set out in this policy. This privacy notice explains our collection, use, disclosure, retention and protection of your personal information for:

- When you enquire about or charter a flight
- When you request or book a flight or additional services with us you will be required to provide us with certain information including your contact and payment details.
- We will use your information to check with you if you want to complete the booking, re-book or enquire or need further assistance with your flight. You can opt out of these communications by emailing [privacy@avantefly.com](mailto:privacy@avantefly.com) and quoting your enquiry reference number.
- When you supply other people’s data:  
If you are travelling with other people or booking a flight or other additional services for other people we will require some personal data about them for example their name, date of birth and passport information.

It is your responsibility to ensure that anyone who you have provided personal data about is aware and happy that you have done so and is aware of how we use and process their information.

### WHEN YOU VISIT OUR WEBSITE OR DOWNLOAD OUR APP

- When you visit our website or app, even if you don’t make an enquiry, we will automatically collect certain information such as your IP address, operating system details, browser details, referrer website and website activity. This information is collected anonymously and may not be connected to your personal information.
- If you are using a mobile device, we may collect data that identifies your mobile device, location details and any specific settings.
- For more information, please see our Cookie Policy below.
- When you request to receive our email newsletter, vote in a poll, or request a whitepaper, report or directions.



- We collect your email address, name and the website you requested our newsletter from and the information you have requested. You can unsubscribe from our newsletter at any time using the Unsubscribe link on any email.
- When supplied by a helicopter or aircraft operator
- If you (the operator) provides us with personal data regarding your staff or crew then it is the operator's responsibility to ensure that anyone who you have provided personal data about is aware and happy that you have done so and is aware of how we use and process their information.

## COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. We use the following cookies:

- **Necessary cookies.** These are cookies that are required for the operation of the website. They include, for example, cookies that enable you to log into secure areas of our website or session tracking.
- **Analytical/performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around the website when they are using it. This helps us to improve the way the website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to the website. This enables us to personalise our content for you, greet you by name and remember your preferences.
- **Targeting cookies.** These cookies record your visit to the website, the pages you have visited and the links you have followed. We will use this information to make the website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website and use the platform, and your user experience may be affected.

## WHEN YOU APPLY FOR A JOB AT AVANTEFLY

- If you apply for a job at AvanteFly we will collect, use and store your personal data in relation to your application and subsequent AvanteFly career.

## HOW YOUR PERSONAL DATA IS USED:

- Your personal data will be used for the following:
- **Flight charter enquiry, booking and flight process:** We will use your personal data to provide to you the services that we sell, which may include flights, and additional products. We need certain information about you, so we can fulfil our obligations contained in the contract that you enter into with us when you book a flight or additional products.
- **User accounts:** When you set up an account on our website or app your provided information allows us to provide you with services such as your ability to manage your bookings and personal settings.
- **To communicate with you in relation to your enquiry or booking:** We will use the contact information you have previously shared with us to communicate with you in relation to your flight enquiry or booking and to provide you with information relevant to your enquiry.
- **Customer services:** We will use the information that you have provided via email, phone, or through our website to help us answer any questions and respond to your query (along with any future enquiries that you may have).
- **Personalisation:** We will use information we hold about you, such as the products and services you have purchased from us in the past, to enable us to show you the products and services we think you will like on our website and app and communicate these with you. If you would like to stop receiving this information please email [privacy@avantefly.com](mailto:privacy@avantefly.com)



- **Marketing:** If you have opted in to receive marketing communications, we may contact you with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about and we think may interest you based on the information we hold about you. We may also use your contact details to contact you by phone or post with details of products and services that we think may be of interest to you (unless you have told us you don't want to receive these communications).
- **Corporate transaction:** We may use your data in connection with a corporate transaction such as the sale of a subsidiary or a division, merger, consolidation or asset sale.

## **DATA PROTECTION AND PRIVACY**

- AvanteFly undertakes that, in performing its obligations, it shall comply with the provisions of the General Data Protection Regulations ('GDPR') and all other applicable laws relating to the processing of Personal Data as defined in the GDPR and, it shall only process personal data in accordance with, and as anticipated in, this Agreement.
- AvanteFly collects and processes customers' personal data to tailor our range of Services to meet the needs of individual customers and to undertake administrative activities in relation to the Services. We will share relevant personal data with AvanteFly third-party service provider of internet access and service desk support to facilitate your use of our Services. We will only use your personal information for marketing if you have provided us with specific consent by opt-in to receive marketing from us or from our preferred third-party suppliers

## **PROMOTIONAL ACTIVITIES**

If you participate in our promotions (such as polls or competitions) we will use the information you provide to administer these activities. Recruitment and employment: If you apply for a job at AvanteFly we will retain your data throughout the recruitment process. If you are successful and are offered a role at AvanteFly we will hold your data in accordance with staff contracts.

## **IMPROVING OUR SERVICES:**

Sometimes we will use your data to help us improve the quality and functionality of the services that we offer. This includes:

- Analysing your recent visits to our website and app and how you move around different sections of our website and app for analytics purposes to understand how people use our website so that we can make it more user friendly. – troubleshooting, data analysis, testing, research and for statistical and survey purposes by us, which helps us to provide the best service that we can. – in some circumstances we may send data about our website and app users in aggregate, anonymised or pseudonymised form to third parties for them to provide these services to us – this is explained in more detail under "Sharing your data with third parties" below.

## **LEGAL BASIS FOR PROCESSING PERSONAL DATA**

Our legal basis for collecting and using the personal data described above will depend on the personal data and the context in which we collect it. We will normally collect personal data from you under the following legal bases:

- **Performance of a contract:** If we have obligations under a contract with you, we will use your information to perform our obligations to you. For example, if you make an enquiry or booking with us, we will use the information that you provide us with when making the booking to complete and administer your request with the relevant third party suppliers.
- **Consent:** If you have given us consent to contact you for marketing purposes, we will rely on this when contacting you with marketing information. You can opt-out of receiving marketing communications from us at any time by contacting us using the details at the end of this policy, by using the Unsubscribe link at the bottom of email newsletters that we send to you.



- Legitimate interests: We will use your information for our own legitimate interests, for example, to improve and promote our services, to provide appropriate content to you on our platforms and for administrative purposes including business records of our relationship with you.
- Legal requirement and vital interests: In some cases, we will have a legal obligation to collect personal data from you (for example to comply with local customs regulations) which may require us to collect and retain records of products and services that we sell.

## **HOW AND WHERE WILL YOUR DATA BE PROCESSED**

- Any information that we hold about you is stored on our secure servers and all payment transactions are encrypted. Only authorised personnel are permitted to access personal data in the course of their work. Whilst we do our best to protect your personal data, no information transferred over the internet can be guaranteed to be completely secure and you provide your information at your own risk.
- Where possible we retain and store your data within the European Economic Area (“EEA”). However, data that we collect from you may be transferred to, and stored at, a destination outside the EEA, including where we transfer your data to our suppliers so that they can provide services to you.
- Where your information is transferred outside of Africa, we will take steps to ensure that the information receives the same level of protection as if it remained within Africa, including by entering into data transfer agreements, using Commission approved Standard Contractual Clauses, or by relying on certification schemes such as the Africa-EU Privacy Shield. You have the right to details of the mechanism under which your data is transferred outside of Africa.

*Please contact [privacy@avantefly.com](mailto:privacy@avantefly.com) for further information.*

## **SHARING YOUR DATA WITH THIRD PARTIES**

We don't sell or rent your data to third parties. However, as part of our business processes and service provided to you there are situations in which we share your personal data with third parties, these can include:

- Aircraft operators and other suppliers: If you charter a flight or purchase additional services with us, it is necessary for us to share your data with relevant third parties to complete your booking. This may include your name, contact details, the names and ages of anyone travelling with you, along with any preferences or special circumstances you told us about when you made your booking.
- AvanteFly LLC: Your details may be shared with AvanteFly LLC who process information for purposes that are described in this Privacy Notice for analytical purposes or to support the services that we provide to you.
- Third party service providers: This includes anyone who provides services or functions on our behalf, including business administration, accounting (including payment processing), marketing, customer feedback, analytical, legal compliance, quality assurance or technical development. Our technology providers and developers may use your data to fix website issues, or develop new features to improve the AvanteFly website. We use these service providers to process your data on our behalf. They have access to and may collect information only as needed to perform their functions and are not permitted to share or use information for any other purpose. Where we provide data to third party service providers for them to provide data analysis or statistical services for us, we will only ever send them aggregated, anonymised or pseudonymised data.
- Payment providers and other financial institutions: If you request a chargeback for your booking, it may be necessary for us to share booking details with the payment service provider and the relevant financial institution, so they can handle the chargeback. This may include a copy of your booking confirmation or the IP address that was used to make your reservation.
- Legal entities: We may be required to disclose your data to third parties, such as official bodies and authorities to comply with relevant laws, orders or regulations, to enforce our terms and conditions or contractual agreements, or to protect the rights of AvanteFly.
- Business restructuring (and any agents and advisers): In connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Notice.



Any information you share through social media platforms or messaging apps such as Facebook or WhatsApp is not covered under this Privacy Notice and you should check their own privacy policies before supplying your personal data. Some of our web pages include links to third party websites. Once you have left our website any data you provide to a third party is subject to the privacy policy and practices of that third party. AvanteFly accepts no responsibility for the content or use of third party websites.

## **RETENTION OF YOUR PERSONAL DATA**

When we have no ongoing legitimate business need to process your personal data (for example, to provide products or services to you or to retain records to manage any claims which you or we may have in respect of the products and services we provide to you), we will either delete or anonymise it or, if this is not possible, then we will securely store your personal data and isolate it from any further processing until deletion is possible.

## **YOUR PERSONAL DATA RIGHTS**

To exercise any of your rights below, please contact [privacy@avantefly.com](mailto:privacy@avantefly.com). We will respond to all requests received from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

You have the following rights in relation to the personal data that we hold about you:

- Access, correct, update or request deletion of your personal data.
- Object to or restrict processing of your personal data
- Request portability of your personal data.
- Opt-out of marketing communications. You can exercise this right by clicking on the “unsubscribe” link in the email newsletters we send you. To opt-out of other forms of marketing then please contact [privacy@avantefly.com](mailto:privacy@avantefly.com).
- Withdraw your consent for us to store or use your personal data. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- Complain to a data protection authority about our collection and use of your personal data. The Information Commissioner’s Office is the data protection authority for Nigeria. Please do contact us first so we can assist with your request.

## **CHILDREN’S PERSONAL DATA**

Our website and app is not intended to be used by children under 18 years of age. We only process information about children with the consent of the parents or legal guardians.

## **HOW DO WE KEEP YOUR INFORMATION SECURE**

- To ensure the security of your data, we use appropriate technology and procedural methods.
- We will not keep your data for any longer than necessary for the purposes of your interactions and transactions with AvanteFly.

## **CONTACTING AVANTEFLY**

You can contact AvanteFly at any time by emailing [privacy@avantefly.com](mailto:privacy@avantefly.com) for the attention of: The Data Protection Officer