



ZEUSCH
AVIATION

PRIVACY STATEMENT

25-5-2024

Who are we?

We are Zeusch Aviation B.V., hereinafter referred to as 'Zeusch, we or us'. We have our registered office in Amsterdam and our visiting address at Arendweg 23, 8218 PE, Lelystad Airport (EHLE), the Netherlands. We are registered with the Chamber of Commerce under number 51404869.

We are in the business of private air carriage and Special Operations. As part of our business, we own and operate aircraft, and -amongst other things- provide (aerial) relay services, aerial surveillance, aerial mapping flights, chartered flights, medevac flights (air ambulance services, aeromedical evacuation or aeromedical repatriation services) and organ transport flights. For more information about our services, we refer to our website: www.zeusch.com.

Background on this privacy statement

We regard the privacy of our clients, employees, (website) visitors and other business contacts as extremely important. We process your personal data in accordance with the applicable privacy legislation, including the General Data Protection Regulation (Algemene Verordening Gegevensbescherming "GDPR")[1]. Both the terms 'personal data' and 'process' have the meaning given thereto in the GDPR. The term 'personal data' means any item of information that directly or indirectly leads to the identification of a natural person, such as a name, address and telephone number. The term 'process' means, for example, the collection, ordering, storing, changing, accessing, forwarding, deletion or destruction of personal data.

Zeusch is the controller with respect to this personal data. This means we have certain responsibilities and obligations regarding the way in which we process your personal data. In this privacy statement, we explain how we treat your personal data.

If you have any questions about this privacy statement or the way we treat your personal data, you can reach us by sending an e-mail to sales@zeusch.com

How do we receive or collect your personal data?

We process the personal data that you have provided to us, for example in the context of the services that we provide, if we are or become a client of you or your organization, or if you reach out to us. We also receive personal data from other organizations within the framework of the services we provide, for example when your personal data is issued to us by a supplier, client, booking agent, insurer or healthcare professional(s) entrusted with your care. We also use personal data from certain public sources, such as the commercial register of the Chamber of Commerce and sanction lists of the European Union. Lastly, we process personal data, to a very limited degree, which has been generated during your visit to our website.

Which personal data do we process and why?

We generally process the following personal data:

- Name, passport details, address details and contact information: such as your name and any title(s), gender, date of birth, nationality, passport details, address, place of residence, telephone number, email address, Chamber of Commerce number and job (title).

[1] Regulation 2016/679/EU of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

- Information about you relating to our services: depending on the services we provide to you, we may collect and process information about your itinerary, specific needs for travelling (such as dietary requests or additional assistance you may require), and information as to whether you are subject to any European sanctions relevant to us and our provision of services to you.
- Medical information: an accurate and up to date 'fit to fly' statement pertaining to you, issued by a competent and qualified healthcare professional, or other information with respect to your health which information is necessary to carry out a medevac flight.
- Bank details: your bank account number, VAT number and other financial details which are necessary for invoices or the financial processes relating to our business relationship.
- Details about your visit to our website and the equipment used: for example part of your IP address, MAC address and the software used.

We process your personal data for the following purposes:

- To identify our customers.
- To maintain contact with you.
- To provide our services to you.
- To fulfil our legal duties (to retain).
- To complete a job application procedure.
- To protect (other) legitimate interests of Zeusch, for example in the context of dealing with a complaint or maintaining our (financial) records.
- To protect, use and improve our website.
- To improve the quality of the services we provide.

We do not apply automatic decision making when processing your personal data (such as profiling).

What are our legal grounds for processing?

When we process personal data we do so on one or more of the following grounds:

- Execution of an agreement: It may be necessary to process personal data in order to conclude an agreement with you, or in the run-up to that. When you commission us to provide services, we process personal data if and insofar as that is necessary for the performance of our agreement. Depending on the type of services we provide to you, we may process certain personal data pertaining to your health. We process such personal data only for the execution of the agreement and provided that you have given your permission hereto (see below).
- Permission: We process certain personal data based on your permission. You can withdraw this permission at any point in time and for any reason (see also the section entitled 'Which rights can you exercise with regard to your personal data?'). If Zeusch stops processing personal data at your request, that may have consequences for the services we provide to you.
- Statutory obligation: Zeusch processes personal data in order to comply with applicable legislation and regulations. Examples include tax legislation or legislation in the field of social security, as well as situations in which Zeusch is ordered, or asked, to issue personal data by a competent authority.

Legitimate interest: Lastly, Zeusch processes personal data on the grounds of one of its legitimate interests, for example processing in the context of internal management (including the (financial) records), for effective communication, the provision of our services and to improve quality.

How do we protect your personal data?

Zeusch does all it can to take suitable technical and organizational security measures to protect your personal data against loss, or against any form of unlawful processing.

This means, among other, the following:

- We do not process more personal data than is needed in order to provide our services to you and to achieve the other goals referred to above.
- Your personal data will only be accessed by authorized employees of Zeusch to the extent this is necessary, and by the management of Zeusch. All employees of Zeusch are obliged to observe confidentiality and will not share personal data with third parties.
- Zeusch only uses secure computer programs, servers and connections.
- Whenever we engage a third party to perform certain activities for, or on behalf of, Zeusch, we ensure that said third party maintains the same level of security and confidentiality as Zeusch.

Who can we share personal data with?

We can share your personal data if this is necessary to execute the agreement with you, if we have a legitimate interest in doing so, or if we are under a legal obligation to do so. Examples of parties with whom we may share your personal information are our own suppliers and (aviation) authorities. If and when we do so, we observe the applicable requirements, for example by concluding data processing agreements or -if applicable- obtaining your explicit permission.

We aim not to transfer your personal data outside of the European Economic Area. However, if you engage us in order to travel to destinations outside of the European Economic Area, such transfer is often necessary to provide our services to you. We note that the laws of the countries in which such destinations are located, might not always offer the same level of personal data protection. Whenever Zeusch transfers your personal data outside of the European Economic Area, it will comply with the conditions which are imposed by the applicable privacy legislation, including the General Data Protection Regulation (GDPR).

[Our website contains links to third-party websites. If you follow those links, you will leave our website. This privacy statement does not apply to the websites of third parties. For more information on how they handle your personal data, please check their privacy and/or cookie policies (if available).]

How long is your personal data kept for?

We do not keep personal data for longer than necessary for the purpose for which you issued it, unless it has to be kept for longer in order to fulfil a legal duty, or because Zeusch has a legitimate interest in doing so. For example, an administrative duty to retain of seven (7) years applies to certain data. Personal data which is provided to us in the context of a job application is, in principle, kept for up to 4 weeks after the application procedure has been completed, unless you have agreed to it being kept for longer.

Which rights can you exercise with regard to your personal data?

You can exercise certain rights with regard to our processing of your personal data:

- Information: You have the right to receive information about the personal data we process on you.
- Access: You can ask Zeusch for access to the personal data it processes of you and to provide you with a copy of the personal data processed by us.
- Rectification or supplementation: You can ask Zeusch to rectify or supplement your personal data if, in your view, such data is incorrect, incomplete, irrelevant, or used in a manner not compliant with the applicable law.
- Deletion/erasure: You can ask Zeusch to erase your personal data, for example because you do not agree (any longer) with the processing of your personal data by Zeusch or because you are of the view that the processing of your personal data by Zeusch is not necessary (any longer) for the purpose for which you issued it to Zeusch.

- **Restriction:** You can ask Zeusch to process less personal data. You can do this if your data is (possibly) incorrect and you have asked us to rectify it, if the processing of your personal data is unlawful, or no longer necessary, but you do not want the personal data in question to be deleted, or if you have objected to the processing due to your specific situation and Zeusch has not yet taken a decision on this matter.
- **Objection:** You can object to us processing your personal data.
- **Revocation of permission:** If you have given us permission to process your personal data, you can revoke this permission.
- **Data portability:** You can ask Zeusch to make your personal data available in digital form, either to you or directly to another organization.

If you wish to exercise one or more of the aforementioned rights, you can submit a request to this effect by email to sales@zeusch.com. Zeusch will process your request as soon as possible and, in any event, by the deadline stipulated in law. Although Zeusch will try to comply with your request, this will not always be (fully) possible or permitted. The reason for this may be, for example, that Zeusch has to (continue to) comply with a legal obligation, or that Zeusch has a legitimate interest which takes precedence over your interest. In such situation, Zeusch will inform you appropriately in order to come to a suitable solution.

In addition to the rights described above, you always have the right to submit a complaint about the processing of personal data by Zeusch to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

This privacy statement is in effect from may 25th 2024.