

PRIVACY POLICY

Effective: January 29, 2021

Jet Support Services, Inc., JSSI Advisory Services, LLC, Conklin & deDecker Associates, Inc., JSSI Parts, LLC and Conklin & de Decker Limited (collectively, “we,” “our,” “us”) respect your privacy and value your trust and confidence. This privacy policy (the “**Privacy Policy**”) applies to any corresponding website that links to or posts this Privacy Policy (collectively, our “**Website**”). Additionally, this Privacy Policy applies to any personally identifiable information obtained from external sources in order to provide our services (collectively, our “**Services**”).

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact us by email at Privacy@jetsupport.com or by regular mail at: **Jet Support Services, Inc., Attn: IT Operations Manager, 180 N. Stetson Ave, 29th Floor, Chicago, IL 60601.**

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1. Introduction.

We are committed to respecting privacy and recognize the need for appropriate protection and management of any Personal Information that is shared with us as part of using the Website or obtained from external sources to provide our Services. As used in this Privacy Policy, “**Personal Information**” means any information that may be used, either alone or in combination with other information, to personally identify an individual, this can include information such as your telephone number and email address.

2. Information Provided by You.

We may collect some or all of the following types of Personal Information when you visit our Website:

- [Contact, Company and Payment Information.](#) We collect Personal Information through creation and management of individuals’ accounts, such as an individual’s name and email address. We also process payment information, via a third-party service provider, if an individual chooses to make a payment to us through our Website.
- [Log-in Credentials.](#) We process log-in credentials to enable individuals to log into and use our Website. Company processes this Personal Information only as necessary to provide our Services via the Internet.

- User Content and Metadata. We process Personal Information that is submitted through our Website to facilitate the Website and to ensure certain features are available to users. We also may process “metadata” related to individuals. Metadata is usually technical data that is associated with individuals. We only process Personal Information that is submitted through our Website and related metadata only as necessary to provide our Services.
- Additional Information. Additional information as otherwise described to you at the point of collection or pursuant to your consent.

3. Information Collected about Certain Individuals.

We may collect some or all of the following types of Personal Information about individuals through our Website:

- Cookies, Devices Identifies, and Similar Technologies. When you use or access our Website, we uses cookies, device identifiers, and similar technologies such as pixels, web beacons, and local storage to collect information about how you use our Website. Company uses the information, including Personal Information, collected through such technologies to help enhance your experience through personalization and to improve our understanding of the features of the Site that you and other users are most interested in. Most browsers provide you with the ability to block, delete, or disable cookies, and your mobile device may allow you to disable transmission of device identifiers. If you choose to reject cookies or block device identifiers, some features of the Site may not be available, or some functionality may be limited or unavailable. Please review the help pages of your browser or mobile device for assistance with changing your settings. With respect to Do Not Track Signals (“DNT”) sent to Company by Your browser, Company does not respond to DNT signals at this time. To learn more about how DNT works, please visit <http://allaboutdnt.com/>.
- Log File Information. When an individual uses our Website, our servers automatically record information, including an individual’s Internet Protocol address (“IP Address”), browser type, referring URLs (e.g., the website that an individual visited before coming to our Website), number of clicks, and how an individual interact with links on our Website, domain names associated with an individual’s Internet Service Provider (“ISP”), pages viewed, and other such information (collectively, “Log File Information”). We may also collect similar information from emails sent to individuals, which then help us track emails that are opened and which links are clicked by recipients. We use Log File Information collected from our implementation of our Website in securing our Website by identifying potential threats and vulnerabilities, and in analyzing the effectiveness of our Website to improve our Website’s function and content.

4. The Purposes For Which We Use Personal Information.

We may use Personal Information that we collect through our Website or gather from external sources for a variety of purposes, including to:

- Maintain or administer our Services, perform business analyses, or for other internal purposes to improve the quality of our business and other products and services we offer;
- We collect your Internet-related information for the purpose of analyzing this information to better understand how visitors use our website; and
- As otherwise described to you at the point of collection or pursuant to your consent.

5. How We Disclose Personal Information.

We are committed to maintain your trust, and we want you to understand when and with whom we may share the Personal Information we collect.

- **Service Providers:** We may share Personal Information with service providers that perform certain functions or services on our behalf (such as to host our Website, manage databases, perform analyses, provide customer service, or send communications for us).
- **Business Transfer:** If we sell all or part of our business, or make a sale or transfer of assets, or are otherwise involved in a merger or business transfer, or in the unlikely event of bankruptcy, a business reorganization, or similar event, we may transfer Personal Information as part of such transaction. We will make commercially reasonable efforts to notify you via email and/or prominent notice on our Website of any change in ownership or uses of your Personal Information, as well as any choices you may have regarding Personal Information.
- **Administrative or Legal Process:** We may disclose Personal Information to third parties in order to protect the legal rights, safety, and security of our organization, our corporate affiliates, subsidiaries, business partners, and the users of our Website; respond to and resolve claims or complaints; prevent fraud or for risk management purposes; and comply with or respond to law enforcement or legal process or a request for cooperation by a government or other entity, whether or not legally required.
- **Other Parties With Your Express or Implied Consent:** We may share Personal Information with third parties when you consent to such sharing.
- **Aggregate Information:** We may share aggregate information with other organizations.

6. Privacy of Children.

We do not knowingly collect or solicit any Personal Information from children. Our Website and its content are not directed at children under the age of 16. In the event that we learn that we have collected Personal Information from a child without parental consent, we will promptly take steps to delete that information.

7. Security.

We have adopted security procedures to help protect against loss, misuse, and unauthorized access to the Personal Information you provide to us. While we strive to protect Personal Information and privacy, we cannot guarantee or warrant the security of any Personal Information you disclose or transmit to our Website and cannot be responsible for the theft, destruction, or inadvertent disclosure of Personal Information.

8. Changes to This Privacy Policy.

We may amend this Privacy Policy at any time. You can see when this Privacy Policy was last updated by reviewing the “**Effective**” legend at the top of this page. Your continued use of our Website after any modification to the Privacy Policy will constitute your acceptance of the new terms. We encourage you to periodically review this page for the latest information on our privacy practices. We may provide you with notice of material changes to the Privacy Policy as appropriate under the circumstances. **UNLESS OTHERWISE INDICATED, ANY CHANGES TO THIS PRIVACY POLICY WILL APPLY IMMEDIATELY UPON POSTING TO OUR WEBSITE.**

9. Access, Choice, and Retention.

If Personal Information about you changes, or if you no longer desire to use our Website, you may request that we update or remove certain Personal Information making the request, by sending us an email at **Privacy@jetsupport.com** or by contacting us by postal mail at the contact information listed below. We will try to respond to your request within 30 days.

We will retain Personal Information for as long as needed to provide our Services. We will also retain and use Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

10. Provisions Applicable to Residents of the European Union and the United Kingdom of Great Britain and Northern Ireland

The following provisions apply to the extent the collection, use, or disclosure of Personal Information is governed by the European Union's General Data Protection Regulation ("GDPR") or the UK Data Protection Act 2018. If you are not located in the European Union or the United Kingdom, or the GDPR or the UK Data Protection Act 2018 otherwise does not apply, these provisions do not apply to You.

10.1 Controller

We are the controller of, and is responsible for, your Personal Information, which is collected, processed, and stored pursuant to this Privacy Policy.

10.2 Legal Bases for Processing

The legal basis for collecting and using the information described in this Privacy Policy will depend on the information concerns and the context in which we collect it. We process Personal Information from you to perform a contract with you, including, as applicable, our Terms of Use; where the processing is in our legitimate interest, such as the purposes described Section 4 of this Privacy Policy (provided that these interests are not overridden by your interests or rights); or if we have your consent.

10.3 Your Rights under EU and UK Law

If you reside in the European Union or the United Kingdom, you may:

- Request access to the Personal Information that we process about you;
- Request that we correct inaccurate or incomplete Personal Information about you;
- Request deletion of the Personal Information about you;
- Request restrictions, temporarily or permanently, on our processing of some or all Personal Information about you;
- Request transfer of Personal Information to you or a third party where we process the data based on your consent or a contract with you, and where our processing is automated; and
- Opt-out or object to our use of Personal Information about you where our use is based on your consent or our legitimate interests.

To make such a request, please contact us by email at **Privacy@jetsupport.com** or by regular mail at: **Jet Support Services, Inc., Attn: IT Operations Manager, 180 N. Stetson Ave, 29th Floor, Chicago, IL 60601.**

10.4 Complaints to a Supervisory Authority

You have the right to make privacy complaints directly to a supervisory authority in your country. We encourage you to first reach out to by email at Privacy@jetsupport.com or by regular mail at: **Jet Support Services, Inc., Attn: IT Operations Manager, 180 N. Stetson Ave, 29th Floor, Chicago, IL 60601** so we have an opportunity to address your concerns directly before you do so.

11. California Residents' Privacy Rights.

The state of California provides its residents with certain rights concerning their Personal Information. This section describes how you may exercise your rights for Personal Information that we collect under this Privacy Policy.

11.1. Categories of Personal Information Subject to California Privacy Rights.

In accordance with California law, we collected the following categories of Personal Information within the preceding 12 months:

- Identifiers (for example, an IP address);
- Contact Information; and
- Inferences drawn from any information identified above to create a profile.

We share each of these categories of Personal Information with third-party vendors to the extent necessary for them to provide us services. We have not sold your Personal Information, as such word is defined under the California Consumer Privacy Act, in the prior twelve (12) months.

11.2. Your California Privacy Rights.

In accordance with California law, California consumers may exercise under the following rights with respect to their Personal Information:

Privacy Right	Description
Access	You have the right to request information on the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such Personal Information is collected and shared. You also have the right to request information on the categories of Personal Information that were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information.
Data Portability	You have the right to receive the Personal Information you have previously provided to us.
Erasure	You have a right to request to have your Personal Information deleted and we will direct shippers to do the same. However, please be aware that we may not fulfill your request for deletion if we are required to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected or complete a contract between us and you; (2) to ensure the Website's integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law; (4) to otherwise

	use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.
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If you would like to exercise your rights listed above, please send (or have your authorized agent send) an email to Privacy@jetsupport.com or by regular mail at: **Jet Support Services, Inc., Attn: IT Operations Manager, 180 N. Stetson Ave, 29th Floor, Chicago, IL 60601**. While we take measures to ensure that those responsible for receiving and responding to your request are informed of your rights and how to help you exercise those rights, when contacting us to exercise your rights, we ask you to please adhere to the following guidelines:

- ***Tell Us Which Right You Are Exercising:*** Specify which right you want to exercise and the Personal Information to which your request relates (if not to you). If you are acting on behalf of another consumer, please clearly indicate this fact and your authority to act on such consumer's behalf;
- ***Help Us Verify Your Identity:*** Provide us with information to verify your identify. For example, provide us (at a minimum) your phone number or email address. If your phone number or email address appears in our records, we may contact you to help confirm that you are making the request. Please note that if we cannot initially verify your identity, we may request additional information to complete the verification process. Any Personal Information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.
- ***Direct Our Response Delivery:*** Please provide us with an e-mail or mailing address through which we can provide our response. If you make the request by email, unless otherwise requested, we will assume that we can respond to the email address from which you made the request.

12. Links to External Websites.

Our Website may contain links to external websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's website. As our Privacy Policy does not apply to third-party website, even if the link was provided on our website, we strongly advise you to review the Privacy Policy and terms and conditions of these external websites.

13. Your Consent.

By using our Website, you are consenting to our processing of your Personal Information as set forth in this Privacy Policy now and as amended by us. "Processing," means using data stemming from your browser or obtain via external sources in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information.

14. Opting Out of Communications.

We may send notifications, newsletters, promotions, or other information via email ("Communications"). You may choose to stop receiving Communications by indicating your preference in your account profile or settings. You may also follow the unsubscribe instructions in any email you receive from us. Please note that certain Website-related Communications are necessary for the proper functioning and use of the Site and You may not have the ability to opt out of those Communications.

15. Contact Us.

If you have any questions about this Privacy Policy, please contact us by email at **Privacy@jetsupport.com** or by regular mail at: **Jet Support Services, Inc., Attn: IT Operations Manager, 180 N. Stetson Ave, 29th Floor, Chicago, IL 60601.**