

## **PRIVACY STATEMENT**

### **Introduction**

The privacy of our customers is of sincere importance to NextLevel Pilots (NLP). This privacy statement explains what information we gather from our customers, how it may be used and how it is protected by NLP. This privacy statement and the policy reflected herein are issued to comply with the EU General Data Protection Regulation, (EU) 2016/679 of 27 April 2016 (GDPR) and any relevant national legislation of EU Member States implementing the GDPR (together the "Regulations").

### **Personal data**

NLP collects and uses certain personal data either directly received from individuals who contract with NLP in their own name for the performance of (training) services, or indirectly via customers that send their employees (and sometimes also other representatives like trainees/instructors) to NLP for training/operational purposes. Typically, the personal data NLP may process from its customer concerns the name, business address/contact details (incl. telephone number and email address), nationality, date of birth, passport details, information in relation to licenses and medicals, training requirements and training performance & grading data. Some NLP training facilities are as a rule equipped with CCTV or video surveillance systems and with an entry registration & security system.

### **Processing and its Purposes**

NLP uses the personal data collected from its customers to conclude a contract for the provisioning of (training) services and, subsequently, to properly perform the contract. NLP therefore collects, uses, administers, records, transfers and stores ("processes") personal data to be able to perform the agreed (training) services in an efficient and cost-effective manner. NLP also processes personal data:

- to facilitate or improve the manner in which we render (training) services, like training performance grading data to allow instructors to better assess task performance;
- to perform various analyses and research, and to create various dashboards and databases of performance data related to employees, instructors and trainees. Such data may be provided to the relevant customer and (subject to the data being anonymous, or rendered anonymous) to other customers, aviation authorities and bodies or associations related to aviation training and safety;
- to carry out, manage and/or maintain our relationship with customers and to manage communications and other dealings. In this respect personal data is shared with affiliated companies;
- to invoice and to process payments, to respond to enquiries or complaints;
- to test, develop or improve the integrity of systems used by NLP in connection with the above; and
- to inform you about any services NLP may be able to provide for your benefit in the future.

CCTV registration or video recordings can be made to detect, record and deter unruly behavior and unlawful acts. NLP also processes data to comply with applicable laws, like aviation regulations dealing with training (verifying validity of licenses), security and sanction regulations, and, generally, for any other purposes that are reasonably necessary or related to the relationship between NLP and our customers.

All of the above collectively referred to as "Purposes". The processing of personal data is considered as necessary for the legitimate interests of NLP (and the customer as the case may be) in rendering quality (training) services in compliance with applicable legislation, having duly taken into account the interests of the employees. In case of a customer, the employees and other representatives are considered the ultimate beneficiaries of the (training) services that NLP provides pursuant to the contract with the customer.

Therefore the Purposes explained above are deemed to be also in the interest of these representatives of the customer. It is necessary for NLP to process personal data of our customers. If such personal data is not or no longer available to NLP, it will not be able to effectively provide (training) services or process the necessary personal data for any of the Purposes identified above. NLP will only process your personal data in accordance with the Regulations and further guidelines or orders issued pursuant thereto, taking into account the latest amendments.

NLP reserves the right to update and amend this Privacy Statement from time to time as may be necessary or desirable in connection with our legitimate business interests, for instance the introduction of new products/services or changes in the Regulations.