



## PRIVACY POLICY ACTS-AVIATION SECURITY, INC.

### Introduction

ACTS-Aviation Security, Inc. ("**Company**" or "**We**") respects your privacy and is committed to protecting it through our compliance with this policy.

This privacy policy ("**Privacy Policy**") describes the types of information we may collect from you or that you may provide when you visit the website [www.acts-sec.com](http://www.acts-sec.com) (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy applies to information, including Personal Data (defined herein), we collect:

On this Website;

In email, text, and other electronic messages between you and this Website or between you and the Company, including, but not limited to e-marketing;

Through mobile and desktop applications you may download from this Website provided Website provides therefor, which provide dedicated non-browser-based interaction between you and this Website; and

When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Privacy Policy.

It does not apply to information collected by:

The Company offline or through any other means, including on any other website operated by the Company or any third party (including our affiliates and subsidiaries); or

Any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see [Processing Personal Data According to the GDPR](#)

In case processing of your Personal Data falls within the scope of the Regulation (EU) 2016/679 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, known as the General Data Protection Regulation ("**GDPR**"), then the Company shall perform such processing in accordance with GDPR requirements. Therefore, in such case, in addition to the above terms, the Company provides you with the following information:

- (a) You are entitled to:
- **Request access** to your Personal Data. This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it;
  - **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate Personal Data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
  - **Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully

exercised your right to object to processing, where we may have processed your Personal Data unlawfully or where we are required to erase your Personal Data to comply with applicable law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;

- **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have a compelling legitimate ground to process your Personal Data which overrides your rights and freedoms;
  - **Request restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the Personal Data's accuracy; (b) where our use of Personal Data is unlawful but you do not want us to erase it; (c) where you need us to hold Personal Data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your Personal Data but we need to verify whether we have overriding legitimate grounds to use it;
  - **Request the transfer** of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you; and
  - **Withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- (b) You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- (c) We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- (d) We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- (e) The Company collects and processes Personal Data based on the consent of Data Subjects; in certain instances the Company may collect and process Personal Data if such collecting and processing is necessary for performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract; or the



Company may collect and process Personal Data if processing is necessary for compliance with a legal obligation to which the controller is subject.

- (f) The Company does not perform automated decision-making, including profiling.
- (g) Except for transfers to and from the parent company of the Company, which is performed based on the agreement between the Company and its parent company embodying contractual clauses provided by the European Commission or if otherwise necessary and legally permissible, the Company does not intend to transfer Personal Data to a third country or international organization.
- (h) You may at any time lodge a complaint with a supervisory authority located in the European Union having jurisdiction over processing; and
- (i) If you wish to exercise any of the rights set out above, please contact [privacy@acts-sec.com](mailto:privacy@acts-sec.com).

### **Data Retention**

The Company will not retain your Personal Data longer than is necessary for the purpose it was collected.

**Changes to Our Privacy Policy**). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **Children Under the Age of 13**

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information, including Personal Data to or on the Website. We do not knowingly collect information, including Personal Data from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [privacy@acts-sec.com](mailto:privacy@acts-sec.com).



## **Information, Including Personal Data, We Collect About You and How We Collect It**

We collect several types of information, including Personal Data, from and about users of our Website, including information:

Relating to an identified or identifiable individual (the “**Data Subject**”) who can be identified, directly or indirectly, in particular by reference to an identifier such as, but not limited to, a name, email address, postal address, telephone number or an online identifier (the “**Personal Data**”); and

About your internet connection, the equipment you use to access our Website and usage details.

We collect this information, including Personal Data:

Directly from you when you provide it to us;

Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies; and

From third parties, for example, our business partners.

Information, including Personal Data, You Provide to Us. The information, including Personal Data, we collect on or through our Website may include:

Information, including Personal Data, that you provide by filling in forms on our Website. This may include information provided at the time of registering to use our Website, subscribing to our service, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website; and

Records and copies of your correspondence (including email addresses), if you contact us.

## **Information We Collect Through Automatic Data Collection Technologies.**

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website; and

Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical data and may include Personal Data, or we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

Estimate our audience size and usage patterns;

Store information about your preferences, allowing us to customize our Website according to your individual interests;

Speed up your searches; and

Recognize you when you return to our Website.

The technologies we use for this automatic data, including Personal Data, collection may include:



**Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website;

**Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies; and

**Web Beacons.** Pages of our the Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### **How We Use Your Information, Including Personal Data**

We use information, including Personal Data, that we collect about you or that you provide to us, including any personal information:

To present our Website and its contents to you;

To provide you with information, products, or services that you request from us;

To fulfill any other purpose for which you provide it;

To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;

To notify you about changes to our Website or any products or services we offer or provide though it;

In any other way we may describe when you provide the information; and

For any other purpose with your consent.

We may also use your information, including Personal Data, to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information, including Personal Data, in this way, please adjust your user preferences in your account profile and opt out by unsubscribing therefrom.

### **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates;
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding;



- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide the information; and
- With your consent.

We may also disclose your Personal Data:

- To comply with any court order, law, or legal process, including responding to any government or regulatory request;
- To enforce or apply agreements, including for billing and collection purposes; and
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

In addition, we will not send you e-mails that you have not agreed to receive nor will we provide your information to third parties. We may periodically send you e-mail announcing news, updates, and event information, and if you choose to supply your postal address, you can receive mailings from us as well.

#### **Choices About How We Use and Disclose Your Personal Data**

We strive to provide you with choices regarding Personal Data you provide to us. We have created mechanisms to provide you with the following control over your information:

**Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

**Promotional Offers from the Company.** If you do not wish to have your email address or other contact information used by us to promote our own or third parties' products or services, you can opt-out by [Unsubscribing to ACTS emails](#).

**Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by [Unsubscribing to ACTS emails](#).

We do not control third parties' collection or use of your Personal Data to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your Personal Data collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

#### **Your California Privacy Rights**

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@acts-sec.com](mailto:privacy@acts-sec.com).

#### **Accessing and Correcting Your Personal Data**

You may also send us an email at [privacy@acts-sec.com](mailto:privacy@acts-sec.com) to request access to, correct or delete any Personal Data that you have provided to us. We may not accommodate a request to change your Personal Data if we believe the change would violate any law or legal requirement or cause the information to be incorrect.



## Data Security

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security thereof transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## Processing Personal Data According to the GDPR

In case processing of your Personal Data falls within the scope of the Regulation (EU) 2016/679 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, known as the General Data Protection Regulation (“**GDPR**”), then the Company shall perform such processing in accordance with GDPR requirements. Therefore, in such case, in addition to the above terms, the Company provides you with the following information:

- (j) You are entitled to:
- **Request access** to your Personal Data. This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it;
  - **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate Personal Data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;
  - **Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing, where we may have processed your Personal Data unlawfully or where we are required to erase your Personal Data to comply with applicable law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
  - **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have a compelling legitimate ground to process your Personal Data which overrides your rights and freedoms;
  - **Request restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the Personal Data’s accuracy; (b) where our use of Personal Data is unlawful but you do not want us to erase it; (c) where you need us to hold Personal Data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your Personal Data but we need to verify whether we have overriding legitimate grounds to use it;
  - **Request the transfer** of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which



- you initially provided consent for us to use or where we used the information to perform a contract with you; and
- **Withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- (k) You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- (l) We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- (m) We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.
- (n) The Company collects and processes Personal Data based on the consent of Data Subjects; in certain instances the Company may collect and process Personal Data if such collecting and processing is necessary for performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract; or the Company may collect and process Personal Data if processing is necessary for compliance with a legal obligation to which the controller is subject.
- (o) The Company does not perform automated decision-making, including profiling.
- (p) Except for transfers to and from the parent company of the Company, which is performed based on the agreement between the Company and its parent company embodying contractual clauses provided by the European Commission or if otherwise necessary and legally permissible, the Company does not intend to transfer Personal Data to a third country or international organization.
- (q) You may at any time lodge a complaint with a supervisory authority located in the European Union having jurisdiction over processing; and
- (r) If you wish to exercise any of the rights set out above, please contact [privacy@acts-sec.com](mailto:privacy@acts-sec.com).

### **Data Retention**

The Company will not retain your Personal Data longer than is necessary for the purpose it was collected.

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to this Privacy Policy on this page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Privacy Policy to check for any changes.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at: [privacy@acts-sec.com](mailto:privacy@acts-sec.com).