



L2 AVIATION PRIVACY POLICY

This policy describes how L2 Aviation handles an individual's private information.

The policy aims to provide clear information for users and/or customers, to provide clear direction to L2 Aviation employees, and to keep L2 Aviation compliant with all applicable local, state, federal and international data privacy regulations.

The policy includes conforming protocols for the receipt, identification, labelling, transmission, and control of private information.

WEBSITE PRIVACY

At L2 Aviation we strive to collect only information we explicitly need and avoid integrating tools that collect data in unsolicited ways.

During the course of online interactions with our website (Site), L2 will collect information that your web browser provides including:

- IP Address
- Web Browser
- Time Zone/Locale

Additionally, as you browse the Site, we collect information about the individual web pages that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site.

We collect Device Information using the following technologies:

- "Cookies" data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit allaboutcookies.org.
- "Log Files" track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- "Web Beacons", "tags" and "pixels" are electronic files used to record information about how you browse the Site.

Additionally when you purchase Services or attempt to purchase Services through the Site, we collect certain information from you, including your name, billing address, shipping address, payment information (including credit card numbers), email address, and phone number. We refer to this information as "Order Information." When we talk about "Personal Information" in this Privacy Policy, we are talking both about Device Information and Order Information.



SHARING AND TRANSFERRING YOUR INFORMATION

In no case do we sell or rent Personal Data to marketers or unaffiliated third parties. We share your Personal Data with trusted entities, as outlined below.

We share Personal Data internally to provide our Services and for internal administration purposes.

We share Personal Data with a limited number of our service providers. We have service providers that provide services on our behalf, such as website hosting, data analysis, information technology and related infrastructure, customer service, email delivery, and auditing services. These service providers may need to access Personal Data to perform their services. We authorize such service providers to use or disclose the Personal Data only as necessary to perform services on our behalf or comply with legal requirements. We require such service providers to contractually commit to protect the security and confidentiality of Personal Data they process on our behalf. Our service providers are predominantly located in the United States of America.

We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, we may use Google Analytics to help us understand how our customers use the Site. You can read more about how Google uses your Personal Information [here](#). You can also opt-out of Google Analytics [here](#).

Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

DO NOT TRACK

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser

USE BY MINORS

The Site is not intended for use by individuals under the age of thirteen (13), and we request that they not provide Personal Data through the Site.



YOUR RIGHTS

You have choices regarding our use and disclosure of your Personal Data:

- **Opting out of Receiving Electronic Communications from L2:** If you no longer want to receive marketing-related emails from us, you may opt-out via the unsubscribe link included in such emails. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages that are required to provide you with our services.
- **How you can Review or Update your Personal Data:** If you would like to review, correct, or update Personal Data you have previously disclosed to us, you may do so by signing in to your account or by contacting us.
- **Your Data Protection Rights:** Depending on your location and subject to applicable law, you may have the following rights with regard to Personal Data we control about you:
 - The right to request confirmation of whether L2 Aviation processes Personal Data relating to you, and if so, to request a copy of that Personal Data
 - The right to request L2 Aviation rectifies or updates your Personal Data that is inaccurate, incomplete or outdated
 - The right to request that L2 Aviation erase your Personal Data in certain circumstances provided by law
 - The right to request that L2 Aviation restrict the use of your Personal Data in certain circumstances, such as while L2 Aviation considers another request that you have submitted, including a request that L2 Aviation make an update to your Personal Data
 - The right to request that we export to another company, where technically feasible, your Personal Data that we hold in order to provide Services to you. Where the processing of your Personal Data is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your Personal Data on grounds relating to your particular situation
- **Process for Exercising Data Protection Rights:** In order to exercise your data protection rights you may contact L2 Aviation; we take each request seriously. We will comply with your request to the extent required by applicable law. We will not be able to respond to a request if we no longer hold your Personal Data. If you feel that you have not received a satisfactory response from us, you may consult with the data protection authority in your country.



For your protection we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. If we no longer need to process Personal Data about you in order to provide our Services or our Sites, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.

If you are a European resident we note that we are processing your information in order to fulfill contracts we might have with you (for example if you subscribe to service through the Site), or otherwise to pursue our legitimate business interests listed above. Additionally, please note that your information will be transferred outside of Europe, including to Canada and the United States.

HANDLING PRIVATE DATA

Private data including Personally Identifiable Information (PII), or personal data (e.g. name and email), must be handled in accordance with our Data Classification Policy. At a minimum, any such data must be encrypted at rest and in transit. It must also have appropriate authorization and auditing so that we are sure that the people accessing the data have the right to do so and that any access is trackable.

PUBLISHING THE PRIVACY POLICY

We may update this privacy policy from time to time in order to reflect changes to our practices or for other operational, legal or regulatory reasons. The "Update Date" at the bottom of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on the Site. We may provide you with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on our website and, if you are a User, by contacting you through our application or an associated user email address.

Policy Name	L2 Aviation Privacy Policy
Policy Owner/Approver	Mark Lebovitz
Approval Date	August 16, 2020
In Force Date	August 16, 2020
Updated	October 16, 2020