

PRIVACY POLICY

Open Aero Ltd

We, Open Aero Ltd (“we”, “us”, “our”), are committed to protecting and respecting your privacy. This Policy will set out the personal data that we may collect and explain how we use that data and how we comply with the General Data Protection regulations (GDPR).

This Privacy Policy (together with our terms of use and any other documents referred to in this Privacy Policy) sets out the basis on which any personal information we collect, or that is provided to us, will be processed. Please read the following carefully to understand our views and practices regarding personal information and how we will treat it. By visiting open.aero you are accepting and consenting to the practices described in this Privacy Policy.

1. Who is the Data Controller

For the purpose of the General Data Protection Regulations (the “Regulations”), the data controller is Open Aero Ltd. We are a limited company registered in England and Wales under company number 10505584 and have our registered office at Acre House, 11/15 William Road, London NW1 3ER, UK.

2. Information we may collect from you and how we use it

We may collect information from you at different points on our website:

a) Make an Enquiry via the Website

If you submit information through the Make an Enquiry section of our website you may submit your name, email address, the subject of your enquiry and your message. You may also give consent to receive marketing and promotional information. This record is automatically forwarded to an authorised employee of the company who will ensure your enquiry is addressed by the relevant person.

b) Technical Information

When you visit our website we may automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages viewed; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

This is statistical data about our website users’ browsing actions and patterns, and does not identify any individual. We use this information to improve our website and to ensure that content is presented in the most effective manner for website users and their computers.

c) By Telephone

If you contact us in relation to our services by telephone or if we telephone you following contact of another nature, we will collect from you a range of information relating to you, including:

Name, Address, Telephone/Mobile number(s), Email and Date of Birth

Passport details

Payment / credit card details

Dietary requirements

Any other relevant information that you choose to provide us with when you complete our online forms or provide by telephone.

This information is retained securely within our registered office. We may forward essential information such as passport details to handling agents where required to fulfil the contract and we rely on the legal basis of contract when transferring such information.

d) Enquiries via Broker

We may also quote for work as a result of online advertised service requirements. In these circumstances we are a Data Processor and work on behalf of the Data Controller who may engage our services on your behalf.

2. How we use your personal information

We use your personal information in the following ways:

To consider and respond to your enquiry about provision of our services

To consider you for any employment vacancies that you have applied for

To respond to any queries that you raise.

To carry out due diligence or make any necessary background checks on you.

For record keeping, statistical analysis and internal reporting.

To notify you about any changes to our service or our website.

To investigate complaints and queries.

As we may otherwise determine to ensure support and operation of our systems.

To protect the rights, property and/or safety of Open Aero Ltd, its personnel and others associated with the organisation.

Marketing

Provided you have given consent, from time to time we may send you direct marketing in relation to our own services and industry news. This may be by telephone, post or email. This will only be sent to you in accordance with the marketing preferences you have provided to us.

Your agreement to the use of your personal information for direct marketing purposes is optional and if you choose not to consent to a specific type of direct marketing, then we will honour that request.

You can also choose to opt out of receiving direct marketing from us at any time, through the 'Unsubscribe' link at the bottom of our emails, by emailing dataprotection@open.aero or by contacting us at +447480138884.

Third Party Advertising Partners

We use third party advertising partners for a variety of marketing services which may include but are not limited to:

LinkedIn's Matched Audience built via your email address as provided to us, with information held in your LinkedIn account (if you have one) in order to enable LinkedIn to show you adverts for our services when you are navigating LinkedIn. You can find more information about how your personal data may be used in connection with LinkedIn's advertising and option for opting out here <https://www.linkedin.com/legal/privacy-policy>

Facebook's Custom Audience service which matches your email address as provided to us, with information held in your Facebook account (if you have one) in order to enable Facebook to show you adverts for our services when navigating Facebook. You can find more information about how our personal data may be used in connection with Facebook's advertising and options for opting out here <https://www.facebook.com/privacy/explanation>.

Google's Customer Match service which matches your email address as provided to us with information held in your Google account (if you have one) in order to enable Google to show you adverts for our services which you are searching on Google, using Google's search network, shopping function, on YouTube or on Gmail.

Other online marketing services of Google's, Google Search which places our adverts within search results; Google Display Network which makes available to us advert space on third party websites, and Google Remarketing which places Open Aero Ltd adverts on third party websites following a user having visited our website.

These services use cookies (and in some circumstances information held in your Google account, if you have one) in order to build profiles about you, for the purposes of providing you with personalised adverts. See section 8 for further details on cookies.

4. Legal Basis for Processing

We rely on the following legal basis to process your personal information:

Where you have provided consent; for direct marketing communications concerning our own services.

For the performance of a contract with you; such as a contract for the provision of services or an employment contract.

To comply with legal obligations; including in relation to health and safety and environmental legislation, performing anti-money laundering, terrorism prevention, complaints and investigations or litigation.

To protect our legitimate interests in circumstances such as (but not limited to) managing delivery of a service to you, operating our websites, sending direct marketing to you, maintaining details of parties interested in employment with us and for our internal business processes such as record keeping, reporting and statistics, data security, quality assurance of our services, investigating and responding to queries, complaints, assessment of risk management, recruitment, training and personnel matters, and protecting our rights, property and safety (and that of others). You can object to processing carried out on this basis by emailing dataprotection@open.aero.

5. How we share your personal information

Where we use your personal information for the purposes specified above, we may also be required to share it (or some of it) with other companies. Only the information required will be transferred. In most circumstances personal information is transferred via secure electronic databases and software systems.

If we transfer personal information to countries outside of the EU we will ensure that it is transferred with adequate safeguards for your personal data.

We may also engage other companies and individuals located both in side and outside the EU to provide services or perform functions on our behalf. In such cases we require third parties to restrict their use of personal data that we provide to them only for the purpose for which it has been provided. We also require that this information is not disclosed to any other parties without consent.

Third parties may provide the following services:

Website and social media management and hosting.

Hosting and maintaining our marketing database.

Third party service providers and agents that we appoint or who act on our behalf as contractors that require access to certain personal information for the sole purpose of delivering the service on our behalf.

Emergency services in the event that we need to report an accident or illness or to request emergency assistance.

Lawyers, accountants, auditors or similar advisors who assist with our administrative processes or whom we ask for advice.

A buyer, assignee or transferee in the event that the business of this site or a part of it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat Personal Data in accordance with this Privacy Policy.

Investors and other relevant third parties in the event of an actual or potential sales or other corporate transaction related to Open Aero Ltd.

A third party if we believe in good faith that we are required to do so because of an applicable law, court order or governmental regulation, is in the interests of public health and safety, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad.

Other third parties, if authorised to do so.

The performance of services by our third party service providers may be subject to a separate privacy statement provided to you by the relevant third party. You should read and such statement carefully.

6. Where we store your personal information

The personal data we collect from you may also be processed, accessed, or stored in countries outside the EEU. Such countries may offer a different level of protection of personal data. If we transfer your personal data to external companies in other jurisdictions, we will make sure to protect your personal data by applying the level of protection required under applicable data privacy laws.

7. How long do we keep your personal information

We retain your personal information for no longer than is necessary for the purpose in which it is collected and held. When determining relevant retention periods, we will take account of the following factors:

Our legal obligations under applicable law to retain data for a certain period of time.

Our obligations under contract with clients and service providers.

The statute of limitations under applicable law.

Other guidelines issues by relevant data protection authorities.

Once no longer required, we will securely erase your personal information.

8. Cookies

A Cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the cookie is added and helps to analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to tailor their operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. It in no way gives us access to your computer or any information about you, other than the data that you choose to share with us. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

9. Links to third party websites

Our website may, from time to time, contain links to and from other websites. If you follow a link to or from any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to these websites.

10. Security

We use reasonable security methods to protect the personal information that we process, including internet standard encryption technology. However please note that whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide to us, no transmission over the Internet can be guaranteed as secure.

Consequently, please note that we cannot guarantee the security of any personal information that you transfer to us over the Internet.

With regard to personal information held on site, both electronically and in paper form, we pay a great deal of attention to ensuring that information is held securely, retained in non-public areas and is accessed only by those employees and third parties who require access in order to carry out their work.

11. Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

If you are asked to fill in a form on the website, you will only be contacted for marketing purposes if you have provided separate explicit consent.

If you have agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to us, or email at dataprotection@open.aero.

Access to information

The Regulations gives you the right to access information held about you. Your right of access can be exercised in accordance with the Regulations. If you would like to receive details of the personal information that we hold about you under the GDPR, please write to us, or email at dataprotection@open.aero.

Changes to our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy. This Policy is effective from 1st December 2019.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be emailed to us at [us dataprotection@open.aero](mailto:dataprotection@open.aero).