

Privacy Notice

1. Introduction

This Privacy Notice explains how your personal data is processed when you use Air Portal (the “Service”) to create an account and submit applications to Approval Authorities.

There are two categories of personal data processed through the Service, each with a different data controller:

Account Data (your name, email address, and other information you provide when you register): Air Portal Ltd is the data controller. We process this data on the lawful basis of contractual necessity — it is required to create and maintain your account and provide the Service to you.

Application Data (the information you provide when submitting an application, including activity-specific details, supporting documents and messages): the Approval Authority you are applying to is the data controller. The Approval Authority defines what data is required and uses it to assess your application. Air Portal Ltd acts as a data processor on behalf of the Approval Authority for this data, under a data processing agreement. The Approval Authority determines the lawful basis for processing your Application Data; please refer to the Approval Authority’s own privacy policy for details.

By using Air Portal, you acknowledge that your data will be processed in accordance with this notice and that your Application Data will be shared with the relevant Approval Authority to assess your application.

2. About Us

Air Portal Ltd is registered in England and Wales. Our registered address is 34 Rylett Crescent, London, W12 9RL.

Contact: info@airportal.aero

3. Data Controllers

Air Portal Ltd is the data controller for your Account Data. Contact: info@airportal.aero.

The **Approval Authority** you are applying to is the data controller for your Application Data. If you apply to multiple Approval Authorities, each is a separate controller for its respective Application Data.

4. What Data We Process

Account Data (Air Portal as controller):

- Your name, email address, phone number and address
- Pilot names, email address, phone number and Flyer ID (where applicable)
- Your organisation and operator details
- Payment and billing information (where applicable)

Application Data (Approving Authority as controller):

- Application details (current, past and future)
- Operator details, equipment and activity-specific information
- Messages sent through the platform

5. How Your Data Is Used

Your data is processed to:

- Enable you to submit and manage applications
- Share your application with the relevant Approval Authority
- Facilitate communication between you and the Approval Authority
- Process payments (where applicable)

6. Data Sharing

Your data is shared with:

The Approval Authority you are applying to, who accesses your application through the platform. Your application data may be shared with third parties at the direction of the Approval Authority, in accordance with their Privacy Policy.

Third-party service providers who help us deliver the Service (see Section 7).

7. Third-Party Service Providers

We use the following third-party service providers. Where they process Application Data, they act as sub-processors under our data processing agreement with the Approval Authority. Where they process Account Data, they act as processors on our behalf.

| Category | Purpose |
|-------------------------|-----------------------------|
| Payment processor | Payment processing |
| Map solution provider | Map display services |
| Cloud hosting providers | Data storage and processing |
| Email Service provider | Email services |

8. International Transfers

Some sub-processors are located outside the UK. Where data is transferred internationally, appropriate safeguards are in place, including Standard Contractual Clauses for the recipients that require it.

9. Data Security

We have implemented appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or misuse. These include encryption, access controls, and regular security assessments.

In the event of a data breach that affects your personal data: where the breach relates to Application Data, we will notify the relevant Approval Authority without undue delay so that they can fulfil their obligations under data protection law; where the breach relates to Account Data, we will, where required by law, notify the Information Commissioner's Office and affected individuals directly.

10. Data Retention

Account Data: We retain your Account Data for the duration of your account and for a reasonable period afterwards to comply with legal obligations (including tax and accounting requirements). Payment records are retained for a minimum of 6 years as required by HMRC.

Application Data: Application Data is retained on behalf of the Approval Authority for a minimum of 3 years to support incident investigations required by the Approval Authority or relevant regulators. The Approval Authority may require longer retention in accordance with their own policies.

To request deletion of your account and associated data, please contact info@airportal.aero. Note that some data may need to be retained to comply with legal obligations.

11. Your Rights

Under data protection law, you have rights including access, rectification, erasure, restriction, objection and portability.

For Account Data: please contact Air Portal directly at info@airportal.aero. We will respond to your request within one month.

For Application Data: please direct your request to the relevant Approval Authority (the data controller). We will assist them in responding to your request.

12. Complaints

If you have concerns about how your Account Data is handled, contact Air Portal at info@airportal.aero. If your concern relates to Application Data, contact the relevant Approval Authority in the first instance.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk.

13. Cookies

We use the following cookies:

| Cookie | Purpose | Necessary |
|---------------------|----------------------------------|-----------|
| _air_portal_session | Remembers you between page views | Yes |
| remember_user_token | Remembers you between visits | Yes |
| | | |

14. Changes to This Notice

We may update this notice from time to time. Changes will be posted on this page.

15. Contact Us

Email: info@airportal.aero

Air Portal Ltd, 34 Rylett Crescent, London, W12 9RL