

## TVPX PRIVACY POLICY

Updated: February 2024

*Please read this Privacy Policy carefully.*

TVPX INC., a Delaware corporation (together with TVPX Aircraft Registration Service LLC and its affiliates and subsidiaries, individually and collectively, “Company”, “we”, “us”, and “our”), is committed to ensuring the security and protection of the personal information that we collect. This Privacy Policy includes (a) our products or services and processes, which may result in the collection of personal data; (b) the purpose for processing personal data; (c) the persons or entities with whom we share personal data; and (d) how long we maintain personal data. This Privacy Policy applies to:

- All information we collect through the products, events, promotions, surveys, contests and all other services (collectively, the “Services”) provided on our websites, applications and platforms, including mobile websites, applications and platforms, any affiliated or non-affiliated third-party sites, and all social media platforms (collectively, the “Sites”); and
- All current, potential and former employees, users, customers, independent contractors, vendors, third parties and/or any other person whose personal data we have collected electronically, in person or otherwise.

***Special Note:*** The Sites are general audience sites and are not designed or intended to target children younger than 16. We do not knowingly target or collect personal information from any person younger than 16.

### What Information Do We Collect?

**Information You Give To Us and Information We Collect From Others.** If you use the Sites or Services, or you otherwise use or purchase our Services, we receive and store information you enter on the Sites, or that you give us in-person, via telephone, email, or otherwise. Moreover, if you purchase, sell or finance an aircraft using the Sites and Services, we may collect information regarding the aircraft such as the registration or N-number, title, proof of insurance, tail numbers, aircraft history, information and about the condition of the aircraft and applicable Personal Information and Identifiers (as defined below). We may also collect personal information from third parties that operate (a) portions of the Sites and Services on our behalf or (b) independent websites. When we obtain personal data from third parties, we will treat the acquired information like the information that we collect ourselves. Depending on the Services we provide to customers and/or the services being provided to us by other third parties, we may collect (and over the previous 12 months have collected) the following information about you from you and/or others:

- Personal information and identifiers, such as name, postal address, email address, telephone numbers, account name, social security number, driver’s license or state identification card number, passport number or other similar information, physical characteristics or description, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information (collectively, “Personal Information and Identifiers”);
- Protected classification information, such as race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental

disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status, sexual orientation or other similar information (collectively, “Protected Class Information”);

- Commercial information, such as the Services purchased, obtained or considered, or other purchasing or consuming histories (collectively, “Commercial Information”);
- Geolocation data, such as physical location or movements (collectively, “Geolocation Information”);
- Professional or employment-related information, such as work history and job descriptions with current and prior employers (collectively, “Employment Information”);
- Education information, such as student financial information, grades, transcripts, class lists and other records related to a student maintained by an educational institution or party acting on its behalf (collectively, “Education Information”); and
- Inferences drawn from any of the personal information listed above to create a profile or summary, such as, for example, an individual’s preferences, abilities, aptitudes, predispositions, behaviors and characteristics (collectively “Profile Information”).

Why We Collect: We collect this information for business and commercial purposes, including in order to:

- ✓ To create, maintain, customize, secure, and manage your account with us, including for accounting, finance, and dispute resolution purposes (such as accounts receivable, accounts payable, account reconciliation, cash management, or money movement) and for consolidated management and reporting;
- ✓ To personalize your experience on the Sites and to deliver content and Services relevant to your interests and requests through our Sites (with your consent as required by law);
- ✓ To process your requests, purchases, transactions, and payments and to prevent financial fraud and other illicit activity;
- ✓ For testing, research analysis, and product development, including to develop and improve the Sites and Services;
- ✓ Initiate, assess, develop, maintain, or expand a business relationship, including negotiating, contracting, and fulfilling obligations under contracts;
- ✓ Perform due diligence regarding an individual’s qualifications and eligibility for the Services, including verifying the identity, qualification, authority, and creditworthiness of the individual and obtaining publicly-available information from third parties (such as publicly-available sanction lists from screening companies);
- ✓ Manage a database of email information, phone information or other information and send transactional communications (such as requests for information, responses to requests for information, orders, confirmations, training, and service updates);
- ✓ Assure quality control and to enforce Company’s standards and policies;
- ✓ Manage and mitigate risk, including for audit and insurance functions, and as needed to meet our obligations and to protect assets;
- ✓ Manage security, including monitoring individuals with access to the Sites, applications, systems, or facilities, investigation of threats, and as needed for any data security breach notification;
- ✓ Monitor and analyze web traffic and online behavior for search engine optimization and social media marketing;

- ✓ Host data files that enable the Sites and Services to function, be distributed, and to provide specific features or parts of the Sites and/or Services;
- ✓ Manage relationships with current and potential customers and for marketing purposes, including sending marketing, promotional, product and service, and customer communications and surveys and other communications to individuals who have not objected to receiving such communications;
- ✓ Anonymize or de-identify the personal information;
- ✓ View and incorporate content hosted on external sites;
- ✓ Respond to law enforcement requests and as required by applicable law, court order, or governmental regulations; and
- ✓ Process payment information and transactions.

## **Do We Share Information With Third Parties?**

We take reasonable precautions to be sure that nonaffiliated third parties and affiliates, to whom we disclose your personally identifiable information are aware of this Privacy Policy and will treat the information in a similarly responsible manner. Our contracts and written agreements with nonaffiliated third parties that receive information from us about you prohibit those parties from transferring the information other than to provide the Services that you obtain from us.

Over the previous 12 months, we have shared the following categories of personal information with third parties: Personal Information and Identifiers, Protected Classification Information, Commercial Information, Geolocation Information, Employment Information, Education Information, and Profile Information.

We will not disclose your personal information to third parties except to provide you with information or services you request, deliver our Services that include your personal information, or under certain circumstances as described in this Privacy Policy, including:

**Your Consent.** We may share personal data with your consent.

**Disclosure For Legal Reasons.** We may release personal data to third parties: (1) to comply with valid legal requirements such as a law, regulation, search warrant, subpoena or court order; or (2) in special cases, such as a physical threat to you or others, a threat to homeland security, a threat to our system or network, or cases in which we believe it is reasonably necessary to investigate or prevent harm, fraud, abuse, or illegal conduct. We may also disclose personal data where needed to affect the sale or transfer of business assets, to enforce our rights, protect our property, or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions.

**Agents & Contractors.** Our contractors sometimes have access to your personal data in the course of assisting in the operation of our business and providing Services to you. These contractors include vendors and suppliers that provide us with technology, services, and/or content for the operation and maintenance of the Sites and the Services. Access to your personal information by these contractors is limited to the information reasonably necessary for the contractor to perform its limited function. Contractors have an obligation under their contracts with us to keep your information confidential and to comply with our privacy and security policies.

**Links To Other Sites.** The Sites may contain links to other websites and resources located on servers maintained by third parties. These links are provided for your convenience and information only and, as such, you access them at your own risk. When you click on one of those links, we will

not provide any personal information about you, but may let the site know that you came from the Sites. We do not control the privacy practices and policies of other sites. Please read their privacy policies in order to understand what information they collect about you and how they use it.

**Aggregated, Non-Personal Information.** We may share aggregated, non-personal information about you with third parties. This is information that is combined with the non-personal information of other users and does not allow you to be identified or contacted. Depending on the circumstances, we may or may not charge third parties for this aggregated information. We also may not limit the third parties' use of the aggregated information.

**Changes In Our Corporate Structure.** If all or part of the Company is merged, acquired or otherwise transferred to another entity, the personal data you have provided to us may be transferred as part of that transaction. We will take steps to ensure that any personal data that is transferred will not be used or shared in a manner inconsistent with this Privacy Policy, as it may be amended.

### **Do We Sell Your Personal Information?**

No. Although the Company shares data with third parties as outlined in this Privacy Policy, the Company does not sell any of your personal information to any third party, nor does the Company share your information for cross-contextual behavioral advertising purposes.

### **How and Where Do We Process and Store Data?**

**Methods of Processing.** The data processing is carried out in accordance with our privacy procedures and policies and using computers and/or related software and IT tools. In some cases, the data may be accessible to certain types of (i) internal parties in charge or involved with the operation of our Sites and Services (i.e., administration, legal, sales and marketing, etc.) or (ii) external parties who assist us in providing, operating, and maintaining our Sites and Services, (i.e., third-party technical service providers, mail carriers, hosting providers, communications agencies, etc.). Still, we notify both internal and external parties of this Privacy Policy and require that internal parties (through employment agreements and related employment policies) and external parties (through written agreements) keep and maintain the data in accordance with the safeguards described in this Privacy Policy and related policies and procedures.

**Third-Party Processing.** We are committed to minimizing the number of third-party processors we utilize in order to lower the risks of your data being exposed. We assess and review each of our third-party processors to ensure that they are in compliance with this Privacy Policy.

### **How Do We Protect Personal Data?**

The Company protects data using administrative, technical, and physical safeguards. When we use third-party service providers, we ask those providers to implement similar safeguards. However, we cannot guaranty that your information is completely secure either within the Company or on the systems of third-party service providers.

### **How Long Do We Keep Your Personal Data?**

We retain personal data we collect from you when we have an ongoing legitimate business need to do so (i.e., to provide you with the Services you have requested or to comply with applicable legal requirements). When we no longer have an ongoing legitimate business need to process your personal information, we

will physically destroy, delete or anonymize it or, if this is not possible, then we will securely store your personal data and isolate it from any further processing until deletion is possible.

### **California Residents**

If you are a resident of California, please read the [California Privacy Notice](#) for more information regarding your privacy protections and privacy rights pursuant to the California Consumer Privacy Act of 2018, as amended.

### **Virginia Residents**

If you are a resident of Virginia, please read the [Virginia Privacy Notice](#) for more information regarding your privacy protections and privacy rights pursuant to the Virginia Consumer Data Privacy Act.

### **Colorado Residents**

If you are a resident of Colorado, please read the [Colorado Privacy Notice](#) for more information regarding your privacy protections and privacy rights pursuant to the Colorado Privacy Act.

### **Utah Residents**

If you are a resident of Utah, please read the [Utah Privacy Notice](#) for more information regarding your privacy protections and privacy rights pursuant to the Colorado Privacy Act.

### **How To Contact Us**

If you have any questions regarding this Privacy Policy or exercising any of your privacy rights, please contact us at the telephone number, email address or mailing address listed below:

Telephone Number: 800-753-6933  
Email Address: [privacy@tvpix.com](mailto:privacy@tvpix.com)  
Mailing Address: 2352 Main Street, Suite 201  
Concord, MA 01742  
Attn: Francine Silverman

### **Changes To This Privacy Policy**

We reserve the right to amend this Privacy Policy at our discretion and at any time. When we make changes to this Privacy Policy, we will give notice to you via (i) the Sites or (ii), where feasible, and at our discretion, contact information available to us. We encourage you to periodically review this Privacy Policy so as to remain informed on how we are protecting your information.