

Privacy Policy

Introduction

Open Horizon Aviation s.r.o. ("Open Horizon Aviation") and its affiliates are strongly committed to protecting personal data. This policy ("Privacy Policy") sets out the basic rules for the collection, processing and storage of personal data, the scope, purposes, sources and recipients of personal data, and rights of the individuals as a personal data subject and other important aspects of use of Open Horizon Aviation's services. When collecting and using personal data, our Privacy Policy is to be transparent about why and how we process personal data.

Open Horizon Aviation is a professional aviation recruitment and crew leasing company placing candidates into permanent and contract positions, as well as providing other aviation-related services, including organizing aviation training programmes. Open Horizon Aviation collects personal data directly from individuals or from others. We collect personal data when individuals apply for positions via our website(s), deal with us in person, by telephone, letter or email, if you send us a CV or respond to our job alert and training opening messages. Personal data about individuals may also be collected from third parties that Open Horizon Aviation contacts for verification or reference purposes. Open Horizon Aviation may also collect individual's personal data on behalf of our affiliated companies in connection with the provision of services to or for the individual.

Personal Data Control

The data controller for Open Horizon Aviation s.r.o. and its affiliates is Open Horizon Aviation s.r.o. ("Open Horizon Aviation"). When supporting some clients with parts of their recruitment process (mainly where candidates apply directly to a client and the client outsources part(s) of the recruitment process to us), then Open Horizon Aviation is the data processor.

Contact details of the data controller:

Open Horizon Aviation s.r.o. (Company registration number: 52690628)

Betliarska 12

85107 Bratislava

Slovak Republic

E-mail: office@open-horizon-aviation.com

Phone: +421 947 946 925

Our Affiliates: Open Horizon Aviation Inc.

Personal Data

Personal data is any information relating to an identified or identifiable living person. The data subjects are identifiable if they can be directly or indirectly identified, especially by reference to an identifier such as a name, an identification number, location data, an online identifier or one of several special characteristics, which expresses the physical, physiological, genetic, mental, commercial, cultural or social identity of these natural persons. Personal data includes, but is not limited to, sensitive data such as criminal background checks, passport details, address and phone number, licence and medical status, employment history and qualifications, assessment results and other data obtained by Open Horizon Aviation in connection with activities described in previous paragraph. Open Horizon Aviation will only

collect, use or disclose sensitive personal data in accordance with the regulations. In general, this data will only be collected or disclosed when we have received explicit consent. Visitors to our website(s) consent to us collecting, holding and processing this information. Individuals showing interest in, or applying for a specific job role or enrolment in a specific training programme will be consenting to our processing of the personal data that has been provided for the purpose of evaluating such interests or applications and considering their suitability for that role.

We may process your personal data on the basis that you have consented to us doing so for a specific purpose, for example, if you apply for a specific role you may have consented to our processing of the data that has been provided for the purpose of progressing your application and considering your suitability for that role. In other cases, you may have provided your written or verbal consent to the use of your data for a specific reason.

Personal Data Collection

Our legal basis for processing of personal data are our legitimate business interests (carrying on the commercial activity of the provision of our services), together with the contractual and legal obligations, and are based on consent for specific uses of personal data. In processing the personal data, Open Horizon Aviation responsibly complies with the regulation No 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, and repealing Directive 95/46/EC ("GDPR"), Slovak Republic Law on the Legal Protection of Personal Data (Act no. 18/2018 on personal data protection and amending and supplementing certain Acts, Decree of the Office for personal data protection of the Slovak Republic no. 158/2018 on procedure for data protection impact assessment), Slovak Republic Law on Electronic Communications (Act No. 351/2011 on electronic communications) and other directly applicable legal acts regulating the protection of personal data, as well as instructions from competent authorities.

Open Horizon Aviation is processing the personal data of:

- Users of its services.
- Visitors of managed website (<http://www.open-horizon-aviation.com> - "website").
- Individuals who have been active on its social media accounts.
- Persons participating in the campaigns and content creation organized by Open Horizon Aviation.
- Persons who have agreed to receive from Open Horizon Aviation marketing messages, promotions and other related activities,

Process of personal data is in accordance with the provisions of the legal acts regulating the legal protection of personal data. Highest technical and legal standards of protection are being applied and all necessary measures to prevent possible breaches of personal data protection are taken.

This Privacy Policy may not apply to other websites with links provided on our website; therefore, we strongly recommend that you read the personal data processing rules applied on such websites. If Open Horizon Aviation enters into a joint venture with, is sold to or merged with another business entity, Open Horizon Aviation reserves the right to transfer the personal data we have to such business

entity. Open Horizon Aviation has clients worldwide and as a result, personal data may be transferred outside the country where we are located. This includes transfer to countries outside the European Union ("EU") and to countries that do not have laws that provide the same level of protection for personal data. Transfer of data will occur where it is necessary as part of the services Open Horizon Aviation provides to or for you. By providing your personal data to Open Horizon Aviation you agree that your personal data may be transferred outside of the EU in such circumstances.

We retain the personal data processed by us for as long as is considered necessary for the purpose(s) for which it was collected. Personal data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights. You may withdraw your consent to our processing of your personal data for a particular purpose at any stage. However, please note that we may continue to retain, or otherwise use your personal data thereafter where we have a legitimate interest or a legal or contractual obligation to do so. Our processing in that respect will be limited to what is necessary in furtherance of those interests or obligations. Withdrawal of consent will not have any effect on the lawfulness of any processing based on consent before its withdrawal.

Purposes of Personal Data Collection

Personal data is being collected and when applicable, retained, in order to:

- Match your details and data against job vacancies and training openings which Open Horizon Aviation considers may be appropriate for you.
- Assess suitability and contact you regarding potential opportunities and/or our services.
- Process registrations and/or applications for job openings or training opportunities.
- Provide information and alerts regarding job and training opportunities, and industry updates.
- Check applicants' qualifications and experience.
- Apply for jobs on your behalf for which you have given us prior consent.
- Source potential opportunities or roles as part of our services.
- Disclose information where we have a legal duty to do so.
- Establish compliance with contractual obligations with clients and business partners.
- Provide relevant details to our clients for roles for which you have applied or, with your prior permission, to clients seeking personnel for similar roles who may be interested in your skills-
- Allow you to apply for specific jobs, or training programmes or to subscribe to Open Horizon Aviation's job and training alerts so that we can notify you when relevant job vacancies and training opportunities arise.
- Address any query or dispute that may arise including establishing, exercising or defending any legal claims.
- Deliver relevant advertising to you.
- Personalise your experience and our offering, whether via our website(s) or otherwise.
- For any other purposes for which you have engaged with Open Horizon Aviation.

Sharing Personal Data

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards. Personal data held by Open Horizon Aviation may be transferred to:

- Third party organisations that otherwise assist us in providing services or information.
- Professional services including (but not limited to) human resource, legal and medical advisors who may receive your data in order to provide advice on your suitability to a vacancy.
- Clients which may receive your data to assess your suitability for a position applied for.
- Law enforcement or regulatory agencies or those required by law or regulations.
- Business contacts, clients and suppliers, where such sharing is permitted under contract or under applicable law or regulation.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

Security of Personal Data

We will hold your personal information in a secure environment and we will take all reasonable steps to protect the personal information you provide us from misuse, loss, unauthorised access, modification or disclosure. It should be noted that no data transmission over the internet can be guaranteed 100% secure and as such we cannot guarantee or warrant the security of any information you submit via the internet. Open Horizon Aviation will keep your personal data no longer than necessary and will appropriately dispose of this data when it is no longer required or if you ask to be removed from our system so that it is protected from unauthorised use or disclosure.

Use of Cookies

When people visit our website, personal data is collected both through automated tracking and interacting with various forms on the website. Personal data may be collected when individuals fill in forms on our website or by corresponding with us by phone, e-mail or otherwise. This includes information provided when an individual registers to use our website, to subscribe to our service or to make an enquiry. The collection of personal data through automated tracking is achieved through the use of cookies. Our website may use cookies to help personalize and maximize your online experience and time online. Cookies are identifiers which a website can send to your browser to facilitate your next visit to our website. A cookie file can contain information such as a user ID that the website uses to track the pages you've visited, but the only personal data a cookie can contain is information which you supply yourself. A cookie can't read personal data off your hard disk or read cookies created by other sites. Some parts of our website use cookies to track user traffic patterns. We do this in order to determine the usefulness of our website to our users and to see how effective our navigational structure is in helping users reach certain

information. If you prefer not to receive cookies whilst using our website, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse all cookies by turning them off in your browser, although you may not be able to take full advantage of our website if you do so. In particular, you may be required to accept cookies in order to complete certain actions on our website, including those which require you to be logged-in. You do not need to have cookies turned on, however, to use/navigate through many parts of our website.

Changes to Privacy Policy

This Privacy Policy may be altered or updated by Open Horizon Aviation from time to time, in which case Open Horizon Aviation will advise of any such alterations or updates by notice on the Open Horizon Aviation website (<https://www.open-horizon-aviation.com/>). If you have any questions regarding this Privacy Policy or requests regarding the process of personal data, please contact us by email: office@open-horizon-aviation.com. By visiting our website, or using the information contained therein, or using our services, you acknowledge and confirm that you have read and understood this Privacy Policy.

Individual's Rights

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by Open Horizon Aviation as a data controller.
- Individuals may request to rectify personal data submitted to or held by Open Horizon Aviation or, where appropriate, contact Open Horizon Aviation via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that Open Horizon Aviation erases their personal data.
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in certain emails received from Open Horizon Aviation.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that Open Horizon Aviation may undertake.

If you wish to exercise any of these rights, please send an email to office@open-horizon-aviation.com.