

# Privacy Policy

Last modified: June 17, 2022

There are many different ways you can use our services – to search for and share information, to communicate with other people or to create new content. When you share information with us, for example by requesting compensation for a flight disruption. As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it
- How we use that information

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then please read about these key terms first before using our site or services. Your privacy matters to Airnsquare Inc. (hereafter referred to as 'Airnsquare') so whether you are new or a long-time user, please do take the time to get to know our practices.

## Information we collect

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which brands do you like and are you likely to like based on that.

We collect information in two ways:

- **Information you give us.** For example, many of our services require you to sign up for a Airnsquare account. When you do, we'll ask for personal information, like your name, email address, telephone number. If you want to take full advantage of the sharing features we offer, we might also request you to grant us access to post a statement on Facebook (requires your consent, which is often provided digitally), which may include your name and photo.
- **Information we get from your use of our services.** We collect information about the services that you use and how you use them, like which site pages have you visited. This information includes:
  - **Device information and log information**
  - **Location information and local storage**

## Device information & Log information

Details of how you used our service, e.g. which pages you visited. We collect device-specific information (such as your hardware model, operating system version).

When you use our services or view content on our website [www.airnsquare.com](http://www.airnsquare.com) (hereafter referred to as the 'website'), we automatically collect and store certain information in server logs. This includes:

- **Internet protocol** address.
- **Device event information** such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
- **Cookies** that may uniquely identify your browser or your Airnsquare account.

## **Location information & Local storage**

When you use Airnsquare services, we may collect and process information about your actual location. We use various technologies to determine location, including IP address and GPS.

We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.

We use various technologies to collect and store information when you visit our website, and this may include sending one or more cookies or anonymous identifiers to your device.

## **How we use information we collect**

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new ones, and to protect Airnsquare and our users. We also use this information to offer you tailored content – e.g. which flight were you affected by a delay or cancellation.

We may use the name you provide when we inform our staff who they are in contact with. When you contact Airnsquare, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like pixel tags, to improve your user experience and the overall quality of our services. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer and allow we find relevant staff which are capable of meeting your language requirements.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Airnsquare processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

## **Transparency and choice**

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make a meaningful choice whether you want to continue to use our service and provide the relevant information and allow us to tailor our offering to the highest standards.

If you do not want to share this information you should immediately stop using our service. Or, alternatively, you may set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it's important to remember that many of our services may not function properly if your cookies are disabled. For example, we may not remember your language preferences or which flight you were delayed/ cancelled on.

## Information you share

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including but not limited to Google.

## Accessing and updating your personal information

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

## Information we share

We do not share personal information with companies, organizations and individuals outside of Airnsquare unless one of the following circumstances applies:

- **With your consent**
- **For external processing**
- **For legal reasons**

We will share personal information with companies, organizations or individuals outside of Airnsquare when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information.

We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

We will share personal information with companies, organizations or individuals outside of Airnsquare if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request.
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Airnsquare, our users or the public as required or permitted by law.

We may share aggregated, non-personally identifiable information publicly – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If Airnsquare is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

## **Information security**

We work hard to protect Airnsquare and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We offer our website via SSL encryption
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Airnsquare employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## **Contact Us**

If you have any questions relating to your data, or a complaint, please send a message to our data protection representative via [dataprotection@airnsquare.com](mailto:dataprotection@airnsquare.com).

## **When this Privacy Policy applies**

Our Privacy Policy applies to all of the services offered by Airnsquare Inc. and its affiliates.

## **Compliance and cooperation with regulatory authorities**

We regularly review our compliance with our Privacy Policy. We also adhere to several self regulatory frameworks. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

## **Changes**

Our Privacy Policy may change from time to time. The latest version will be displayed on our website under 'privacy policy' and will have immediate effect. Airnsquare is not responsible to update users on any changes, the users are responsible to stay attuned to the existing privacy policy, which is displayed on our website.