

## Privacy Policy

Please read this policy in connection with our Cookies Policy, which is available on our website.

The International Registry of Mobile Assets (Aircraft) (the “**International Registry**”) is a web-based platform designed to facilitate the registration and checking of financial interests in aircraft equipment, and to assist in determining the order of priority of interests.

Aviareto Limited (the “**Registrar**”, “**we**”, or “**us**”), Suite 5, Plaza 255, Corporate Park 2, Blanchardstown, Dublin 15, Ireland, is the Registrar of the International Registry having been appointed by the International Civil Aviation Organization (“**ICAO**”). The Registrar manages the International Registry, which includes collecting and Processing the Personal Data contained in the International Registry in order to ensure its effective operation.

This policy applies to visitors and to users of the International Registry’s website, including individual contacts and back-up contacts (“**Users**”, “**your**” or “**you**”). In connection with your use of the International Registry, the Registrar will need to collect and Process certain information about you.

Please review this policy carefully as it describes the way in which we will Process Personal Data in connection with the International Registry and the procedures we have in place to safeguard your privacy. You are responsible for providing a copy of this policy to any individuals whose Personal Data you submit to the International Registry.

As the Registrar is located in the European Union, any Personal Data which is Processed by the Registrar in connection with your use of the International Registry will be treated in accordance with the provisions of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and Council of 27 April 2016) and any consequential national data protection legislation in Ireland (together, the “**Data Protection Laws**”).

### Definition of Terms

“**Personal Data**” means data relating to a User which can be used to identify, directly or indirectly, the User, for example by reference to an identifier such as a name, identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the User.

“**Controller**” means any persons who determine the purpose for which and the manner in which any Personal Data is Processed.

“**Processor**” means any persons who Process Personal Data on behalf of a Controller.

“**Processing**” is any activity that involves the use of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“**Cape Town Convention**” means the *Convention on International Interests in Mobile Equipment* and the *Protocol to the Convention on International Interests in Mobile Equipment on Matters specific to Aircraft Equipment*, both signed at Cape Town on 16 November 2001.

“**Regulations and Procedures**” means the *Regulations and Procedures for the International Registry* (ICAO Doc 9864).

## **What information do we collect and how do we use it?**

### **General**

The information we may collect and Process about you includes (as applicable) your name, home address and telephone number, online identifiers, email address, credit card information, your employer, work address and telephone number, details of any trade body to which you belong, your International Registry User I.D., date of birth, certificate ID number and other information provided by you (or by someone registering an account on your behalf) on registration. We may also require a copy of your passport / driving licence in order to verify your identity. This Personal Data is collected directly from you (or by someone registering an account on your behalf) when you apply for a User account, or otherwise interact with the International Registry or our website. We do not intentionally Process Personal Data about you collected from any sources other than directly from you, unless it is given to us by someone registering an account on your behalf.

We will also collect and store limited Personal Data (i.e., name, job title, email address and phone number) relating to Users' back-up contacts in the course of registering a User's interest in mobile equipment. You acknowledge that you have informed your back-up contact that their Personal Data may be collected and Processed by the Registrar.

In order to facilitate the operation of the International Registry, we will publish the following Personal Data on the International Registry website: User name, User address, User entity reference, email address, telephone number.

### **International Registry Messages**

We may also Process other information which you provide to us from time to time through the International Registry, including records of messages posted by you through the website and the contents of those messages.

We will be able to view all messages and authorisations transmitted through the International Registry for the purposes of internal management analysis. Because of the nature of the International Registry, the information available to us will include the identities of the senders and recipients of such messages, but it is not the purpose of such access to monitor the activities of individual Users.

We may monitor or keep a record of the communications made on the International Registry to establish facts, ensure compliance with applicable regulatory practices and our internal policies, demonstrate standards that should be achieved (for example relating to quality control and training), prevent crime, investigate the unauthorised use of the International Registry and / or our telecommunications systems, secure effective operation of the International Registry and any related systems, and to establish the nature of communications made on the International Registry (for example whether they are business or personal communications). We shall not use Personal Data which may identify any individual User or undertaking for training or demonstration purposes.

### **Purpose and Lawful Basis for Processing your Personal Data**

For Personal Data to be Processed lawfully, it must be Processed on the basis of one of the lawful bases set out in the Data Protection Laws. These include, among other things, your consent to the Processing; for compliance with a legal obligation to which the Registrar is subject; or for the legitimate interest of the Registrar or a third party (provided in the case of the latter that your rights are not unduly prejudiced by the Processing).

The primary purpose for which your Personal Data will be Processed is to facilitate the operation of the International Registry (including registering you as a User, issuing you with a User I.D., validating your identity and processing payments), the registration of financial interests in mobile equipment and the determination of order of priority of interests. This is carried out on the basis of our compliance with our legal obligations under the Cape Town Convention and other applicable laws.

In addition to the above, we may process your Personal Data for the purpose of, and in accordance with, our legitimate interest in ensuring the efficient operation of the International Registry.

## **Disclosure and Sharing of Your Personal Data**

### **Registry Use**

Personal Data associated with your registration will be made available to other Users who carry out searches of the International Registry. This publication is a requirement of the Cape Town Convention and one of the primary functions of the Registry.

### **General**

The Registrar will otherwise only share your Personal Data with selected third parties in limited circumstances including those described below. Specifically, we will share a copy of your Personal Data with (i) the International Registry software developer and server service provider; and (ii) ICAO.

### **Users acting on Behalf of a Company**

Where you access and use the International Registry on behalf of your employer and your employer is a subsidiary within a group of companies, we may disclose information relating to business conducted through the International Registry by you on behalf of your employer (which information may identify you as the sender and recipient of the relevant messages) to your employer, and other members of its corporate group (including the parent company).

### **User Surveys**

Where you have agreed to participate in a User survey, your email address will be shared with our third party contractor which acts as a Processor on our behalf to conduct either an annual User survey on behalf of the International Registry or an experience survey following an interaction with our helpdesk.

Participation in these surveys is based on your consent and you therefore have a choice as to whether or not to disclose this information. Survey information will be used for the purposes of monitoring or improving the use of, and satisfaction with, the International Registry website, and improving our customer service and product offerings.

We may use aggregate information and statistics obtained from such surveys for the purposes of monitoring use of the International Registry in order to help us maintain and develop it. This aggregate information may be provided to third parties but will not include Personal Data which can be used to identify you.

You may withdraw your consent to participate in the User survey at any time by contacting the Registrar at the details outlined below. You will suffer no adverse effects if you choose not to participate in a User survey.

### **Other Recipients**

We may provide Personal Data which we hold relating to you if we are required to do so by law or a court order.

We may also disclose the Personal Data we have collected about you to our service providers and professional advisers, or in connection with a transfer of all or part of our responsibility for operating the International Registry (on the basis that such recipient(s) use such information only for the purposes of the operation of the International Registry).

### **International Data Transfers**

The International Registry is hosted on a server operated by the Registrar or by a third party on its behalf. The International Registry server is currently located in secure premises in Ireland. Your Personal Data will be processed by the Registrar (or any other third party to whom we may outsource the hosting or operation of the International Registry website) in accordance with Data Protection Laws. The server will not be relocated to a country which does not provide a similar level of legal protection for Personal Data without your being notified first.

As noted above, your Personal Data may be accessed by persons carrying out searches of the International Registry who may be located worldwide. Our lawful basis for such transfers is that the transfer is made from a register which, in accordance with Irish and EU law, is intended to provide information to the public and which is open to consultation by the public.

We will also occasionally transfer your Personal Data to ICAO in connection with our obligations under the Cape Town Convention and our contract with ICAO. These transfers are required in order for us to perform our contractual obligations to you in accordance with applicable law and the licence to access and use the International Registry.

### **Retaining your Personal Data**

We will retain and Process your Personal Data for the period which we are required to do so under applicable law, including the Cape Town Convention and in particular the Regulations and Procedures for operating the International Registry. If you require further information please contact us using the details below.

## **How We Protect Your Personal Data**

### **General**

We will take appropriate measures including IT security and operational measures to protect the information on the International Registry website. The International Registry may only be accessed via the public internet using, in certain cases, a unique User I.D. and password. We will take steps to restrict the information which is available to Users of the International Registry so far as practicable to that which is necessary for their involvement in the International Registry.

We have installed a system to ensure that communications between the International Registry and its Users travel along an encrypted connection, commonly referred to as SSL that uses digital server identities to help ensure that information you provide is passed only to the International Registry. When you transmit information to the International Registry, your browser will be provided with a digital certificate confirming that you have accessed our website and communications between you and the International Registry will be encrypted. Firewalls are used to attempt to block unauthorised traffic to

the servers and databases and the actual servers are located in a secure location which can be accessed only by authorised personnel.

We also take appropriate measures to keep your information confidential. The Registrar's internal procedures cover the storage, access and disclosure of your information. Where appropriate, please remember to log out of the International Registry when not using it to prevent unauthorised access.

## **Your Rights**

The Registrar will Process all Personal Data in accordance with your rights, in particular your right to:

- (i) access and obtain a copy of the Personal Data the Registrar holds about you (your access right);
- (ii) have any inaccurate Personal Data the Registrar holds about you corrected;
- (iii) to the extent permitted by applicable law, request that any of the Personal Data the Registrar holds about you be erased;
- (iv) require in certain circumstances that the Registrar restricts its Processing of your Personal Data;
- (v) object to the Registrar Processing your Personal Data;
- (vi) obtain your Personal Data as held by the Registrar to provide to a third party yourself or you can require the Registrar to transfer your Personal Data directly to a third-party nominee (the right to data portability); and
- (vii) not to be subjected to Processing which is wholly automated, and to object to any decision-making based solely on automated Processing.

The rights set out above are not absolute – certain conditions may apply (e.g. there are statutory exemptions to your right to access or erase your Personal Data held by the Registrar). However, the Registrar will do its best to vindicate your data protection rights to the greatest extent practically possible. If you wish to exercise any of the rights outlined above, you can contact the Registrar using the details outlined below.

## **Making a Complaint**

If you have any queries in relation to your Personal Data rights, you should contact the Registrar using the details outlined below. You also have the right to lodge a complaint with the Irish Data Protection Commission (its details are [here](#)).

### **Changes to this Privacy Policy**

We reserve the right to change this policy as necessary, for example, to comply with changes in laws, regulations, practices, procedures and organizational structure or requirements imposed by the Irish Data Protection Commission and other authorities.

Changes to the policy shall be applicable on the effective date of implementation. The revised policy will be posted to this page so that you are aware of the information we collect, how we use it and under what circumstances we may disclose it.

### **How to Contact the Registrar**

If you would like to contact us with any queries or comments in relation to data privacy or otherwise, please contact the Registry Officials at [registryofficials@aviareto.aero](mailto:registryofficials@aviareto.aero), or at Aviareto Limited, Suite 5, Plaza 255, Corporate Park 2, Blanchardstown, Dublin 15, Ireland.