

## **Magellan Aviation Group LLLP Sensitive Personal Information Policy**

### Introduction

We, Magellan Aviation Group LLLP together with our subsidiaries Magellan Aircraft Services LLLP, Magellan Aviation Services Limited, and B&B Marketing Enterprises LLLP (hereinafter collectively “Magellan,” “we,” “us,” and “our”), explain in this Policy how we collect, process, and use Sensitive Personal Information that you provide to us by filling out various employment forms or otherwise by distributing to us via hand delivery, our website, courier mail, or direct email (collectively, the “**Platforms**”). It also describes your choices regarding our use and retention of your Sensitive Personal Information. This Policy applies only to information we collect, process, and use through the Platforms.

### Information You Give Us

“**Personal information**” includes any information that relates to an identified or identifiable person. Personal information includes identifiers that can be used to link to, single out, or distinguish an individual, even when the identifiers do not readily identify the person. For example, unique device IDs (e.g., IP addresses), geolocation data, encoded/key-coded data and other data that can be attributed to a particular person. Please go to <https://www.magellangroup.net/> and select “Privacy Policy” at the bottom to view our Privacy Policy for general personal data policies.

However, information known as “**Sensitive Personal Information**” is afforded **higher levels of protection**. Jurisdictions differ in what is considered “**Sensitive Personal Information**”, and Magellan defines “**Sensitive Personal Information**” to include:

- government-issued ID numbers (such as Social Security numbers, Passport numbers, or Driver’s license numbers);
- information regarding an individual’s race, ethnicity, health, medical history, sexual orientation, political or religious beliefs, or trade union membership;
- financial account numbers;
- precise geolocation information;
- health information and medical histories;
- credentials used to access online accounts;
- genetic data; and
- biometric information used to uniquely identify an individual.

### How We Use This Information

We collect Sensitive Personal Data for internal business purposes, KYC, Human Resources purposes, fraud prevention purposes and provision of our Internet security services. Information we sometimes collect may include a government-issued ID number such as passport number or driver’s license number, financial account numbers, precise geolocation information, etc. We collect and use personal information as described in this Policy only as much as it is necessary to fulfill Magellan’s business purposes. These business purposes include the following:

- Contacting you per your request about career opportunities;
- Contacting you per your request about general inquiries;
- Providing “Know Your Customer” documentation ONLY if it is absolutely necessary for a business purpose and ONLY with the permission of the individual to which the data belongs for EACH instance of data dispersal;
- Distributing news and updates to you in accordance with your subscription;
- Distributing owed compensation, including wage payment, distribution of benefits, and/or other such payment to which an employee is legally entitled;
- Maintaining such records of company personnel that are reasonably necessary for the efficient operation of business or as otherwise required by law; and
- Otherwise contacting employees for business purposes.

#### How Long We Keep Your Personal Information

We keep your personal information only so long as we need it to provide the service you requested or to fulfill such other purposes described in this Policy. When we no longer need to use your personal information, we will delete it from our system.

For European Economic Area (EEA) residents we will delete personal information upon request in accordance with the GDPR (the “Right to be Forgotten”, which does not override Magellan’s legal and compliance obligations).

#### Recording Policy

We may occasionally request to record a meeting or a phone call when necessary for a legitimate business use. All participants will have the option to opt-out prior to being recorded. Recordings will be kept securely, only for as long as strictly necessary for the purposes such recordings were made, and personal data shall be deleted in accordance with the GDPR. Magellan is prohibited from recording the personal conversations of staff, even with consent.

#### Security Safeguards

We employ physical, electronic, and managerial measures to safeguard the information we collect online. However, no company can fully eliminate security risks; accordingly, we make no guarantees about any part of our services.

#### Data Controller

Magellan controls the information it collects, processes, and uses through the Platforms. EU-U.S. DPF Participation. Magellan Aviation Group LLLP complies with the EU-U.S. Data Privacy Framework (the “EU-U.S. DPF”) as set forth by the U.S. Department of Commerce. Magellan Aviation Group LLLP has certified to the U.S. Department of Commerce that it adheres to the E.U.-U.S. Data Privacy Framework Principles (**EU-US DPF Principles**) with regard to the processing of personal data received from the European Union in reliance on the EU-US DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles, the Principles shall govern. To learn more about the DPF program and to view our certification, please visit: <https://www.dataprivacyframework.gov>

With respect to personal data received pursuant to the EU-US DPF, we are subject to the investigatory

and enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Magellan has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) regarding unresolved EU-US DPF complaints concerning data transferred from the EU.

#### Data Access

Data Subjects whose Personal Data is covered by this EU-US DPF Statement have the right to access such Personal Data and to correct, amend, or delete such Personal Data if it is inaccurate or has been processed in violation of the EU-US DPF Principles (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the Data Subject's privacy, or where the rights of persons other than the Data Subject would be violated). Magellan will make reasonable and practical efforts to comply with your request, so long as our doing so would be consistent with applicable law, Magellan's contractual requirements, and/or the professional standards applicable to Magellan. You may access your data via request to the legal department at:

[legal@magellangroup.net](mailto:legal@magellangroup.net)

OR

Calling toll-free at +1 (980) 256-7103

#### EEA Resident Rights

If you are a resident of the EEA, you have the following data protection rights:

- You may access your personal data upon request.
- You may object to the processing of your personal information, withdraw consent to the processing of your personal information, or request the deletion of your personal information at any time by contacting us at:

[legal@magellangroup.net](mailto:legal@magellangroup.net)

However, withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal of consent.

- You may opt-out of your subscription to news and updates at any time. You can exercise this right by clicking on the "unsubscribe" link in the News and Updates email. Upon doing so, we will delete such personal information given for this purpose in accordance with this Policy.
- You may submit in accordance with the EU-US DPF Annex I Arbitration Mechanism certain residual claims to arbitration to determine whether a EU-US DPF organization violated its obligations to you.
- It is possible, under certain conditions, that you may invoke binding arbitration.

### Liability in the Case of an Onward Transfer to a Third-Party

Magellan does NOT plan to transfer personal information to third parties. Nevertheless, if in the future Magellan does transfer personal information to a third party, Magellan remains liable under the DPF Principles if the third-party processes such personal information in a manner inconsistent with DPF Principles. Magellan remains liable unless it can prove that it is not responsible for the event giving rise the damage.

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### *Updates to Our Sensitive Personal Information Policy*

*We may periodically revise this Policy by posting an updated version on our website at [magellangroup.net](http://magellangroup.net). This version of the Policy will be effective as described at the beginning of the Policy. Your continued use of the Platforms is subject to the most current effective version of this Policy.*